

Message

From: Culligan, Kevin [Culligan.Kevin@epa.gov]
Sent: 3/31/2025 6:44:44 PM
To: AirAction [AirAction@epa.gov]
CC: Noonan, Jenny [Noonan.Jenny@epa.gov]
Subject: RE: Presidential Exemption: Iron and Steel Rule: Blue Streak Steel Corporation, Roanoke, VA

It is weird that it comes from a gmail account and not a corporate account. I also couldn't find a Blue Streak Steel Corporation, but I would still put it on the list. But put a note that company needs to be verified.

-----Original Message-----

From: AirAction <AirAction@epa.gov>
Sent: Monday, March 31, 2025 2:09 PM
To: Culligan, Kevin <Culligan.Kevin@epa.gov>
Cc: Noonan, Jenny <Noonan.Jenny@epa.gov>
Subject: FW: Presidential Exemption: Iron and Steel Rule: Blue Streak Steel Corporation, Roanoke, VA

This one was in the junk folder.

Kevin - Sharing for your POV on the email below.

-----Original Message-----

From: Alan Thornton [Ex. 6 Personal Privacy (PP)]
Sent: Friday, March 28, 2025 12:18 PM
To: AirAction <AirAction@epa.gov>
Subject: Presidential Exemption: Iron and Steel Rule: Blue Streak Steel Corporation, Roanoke, VA

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Dear EPA Presidential Exemption Review Committee,

Re: Request for Presidential Exemption under Clean Air Act Section 112(i)(4)

I am writing on behalf of Blue Streak Steel Corporation to request a presidential exemption from the National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review (89 FR 23294; April 3, 2024).

Specific Details of Request:

- * Regulation: Integrated Iron and Steel Manufacturing Facilities Technology Review
- * Facility: Blue Streak Steel Corporation, Roanoke, Virginia
- * Requested Compliance Period: Two (2) years

Justification for Exemption:

1. Technological Unavailability The proposed emissions control technologies require comprehensive retrofitting of our primary blast furnace and steel processing lines. Current market-available technologies are either:

- * Prohibitively expensive (estimated \$47.3 million in capital investments)
- * Not fully compatible with our existing infrastructure
- * Projected to reduce operational efficiency by approximately 22%

Our engineering assessments indicate that no current technology can be seamlessly integrated without significant production disruptions and potential compromise of our manufacturing capabilities.

2. National Security Interests

Blue Streak Steel is a critical supplier to:

- * Department of Defense infrastructure projects
- * Strategic military equipment manufacturing
- * National infrastructure construction initiatives

Implementing these emissions standards would:

- * Reduce our production capacity by 35%
- * Potentially interrupt steel supply chains for critical national infrastructure
- * Create vulnerabilities in domestic manufacturing resilience

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Our facility supplies specialized steel components for military vehicle chassis, bridge construction, and critical transportation infrastructure. Any significant reduction in our production capabilities could negatively impact national infrastructure readiness and defense manufacturing supply chains.

Requested Action: We formally request a two-year presidential exemption to:

- * Complete comprehensive technology assessment
- * Develop custom emissions mitigation strategies
- * Maintain uninterrupted production of critical steel products

We are committed to environmental stewardship and will use this period to develop a comprehensive, technologically sound approach to emissions reduction that does not compromise our national manufacturing capabilities.

Sincerely,

Alan R. Thornton
Chief Compliance Officer
Blue Streak Steel Corporation