encourage[ing]" EPA to communicate with "industry experts and other stakeholders" and ensure that the final rulemakings are "technically feasible, financially reasonable, and continue to protect the livelihoods, health, and safety of workers and steel-producing communities throughout our nation." That is exactly what this Administration is doing by providing outreach in the form of a Presidential Exemption, and we ask that you consider this request on its merits.

The threat of global steel imports raised by the Senators in the letters to EPA is a material threat. Foreign steel imports risk the competitiveness and advancement of the domestic steel industry, to the point of potentially threatening U.S. domestic production capacity and continued investment in taconite iron mining, coke manufacturing, and iron and steelmaking capacity based on the costs outlined above. As emphasized by the U.S. Department of the Treasury's Committee on Foreign Investment in the United States ("CFIUS"), without such domestic steelmaking investment, there could be ripple effects on the supply chains that depend on such steel, particularly supply chains that are part of our national defense infrastructure such as "critical manufacturing, energy, transportation, and communications (all vital to national security)."[30] National defense infrastructure, for example, needs ready access to high purity steel from blast furnaces.[31] Once these complicated iron and steel making operations are shut down and/or idled, it is no simple matter to restart them. In short: "The loss of domestic production is a critical national security concern given the ubiquitous nature of steel throughout multiple critical industries."[32]

For all the reasons stated above, Cliffs urges the issuance of a two-year exemption from the compliance deadlines in the final H&S Rule, pending EPA's review of the rule for possible revision. If you have questions or need additional information, please contact Walter Tamukong at 216-694-4862 or at walter.tamukong@clevelandcliffs.com.

Respectfully submitted,

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[30] Letter from Andrew Fair, Acting Assistant Secretary for Investment Security, U.S. Department of the Treasury, to Ama Adams, Ropes & Gray LLP, and Mark Plotkin, Covington & Burling LLP, Re: CFIUS Case 24-154 (Dec. 14, 2024) ("CFIUS Letter"), p. 28.

[31] *Id.* at p. 24.

[32] *Id.* at p. 28.