United States Steel

March 31, 2025

Hon. Lee M. Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460

VIA E-MAIL
airaction@epa.gov

Dear Administrator Zeldin:

Re: Request for Clean Air Act Section 112(i)(4) Presidential Exemption from National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries; Residual Risk and Technology Review, and Periodic Technology Review, 89 Fed Reg. 55684 (July 5, 2024) ("Coke RTR Rule")
United States Steel Corporation – Mon Valley Works, Clairton Coke Plant

United States Steel Corporation (U. S. Steel) respectfully requests a Presidential Exemption for the compliance with the National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries; Residual Risk and Technology Review, and Periodic Technology Review, 89 Fed. Reg. 55684 (July 5, 2024) (the "Coke RTR Rule") for its Clairton Coke Plant in Clairton, Pennsylvania. Among other things, the Coke Ovens Rule promulgated new and revised National Emission Standards for Hazardous Air Pollutants (NESHAP) for the Coke Ovens: Pushing, Quenching, and Battery Stacks (PQBS) source category (40 C.F.R. Part 63 Subpart CCCCC) and the Coke Oven Batteries (COB) source category (40 C.F.R. Part 63 Subpart L). As specifically noted herein, technology to implement these requirements are not available and it is in the national security interests of the United States that such an exemption be granted.

On March 12, 2025, EPA announced that it was taking appropriate action to advance President Trump's initiative of "Powering the Great American Comeback." As part of that effort, EPA indicated that it was reconsidering the Coke RTR rule as well as several other rules; and advised that "any source interested in a Presidential Exemption, should provide their recommendations to EPA by March 31, 2025;" and that sources need only provide why technology is unavailable and why it is the national security interests of the United States to provide the exemption. In response to that announcement, and consistent with our previously submitted petition for judicial review, petition for administrative stay and reconsideration, and request for extension pursuant to Clean Air Act Section 112(i)(3)(B), U. S. Steel is submitting its request for a Presidential Exemption pursuant to Clean Air Act Section 112(i)(4) for the Coke RTR for its Clairton plant, the largest coke plant in North America, located in Clairton, Pennsylvania.

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