responsible for over $520 billion in economic output, supporting over 2 million jobs. It generates over $56 billion in tax revenues annually. U. S. Steel specifically supplies steel to the U.S. transportation and automotive sectors, including major U.S. automakers; the construction sector; containers and packaging sector; appliances and electrical equipment sector; and oil, gas, and petrochemicals sector. For these industries which are critical to U.S. economic security U. S. Steel provides high quality domestically produced steel. U. S. Steel is also a major contributor to the communities in which it operates – including, among others, in Alabama, Arkansas, Pennsylvania, Indiana, Illinois, Minnesota, and Michigan directly and indirectly supporting jobs and economic growth, which underpin the United States' economic security. As stated in the President's America First Investment Policy, "economic security is national security." Consistent with this, the Federal government has determined that the steel industry is "critical to minimum operations of the *economy* and *government*."[2]

In the case of steel, the history of U.S. Government actions to ensure the continued viability of the domestic steel industry demonstrates that, across decades and Administrations, there has been consensus that domestic steel production is vital to our national interest. The overall security of the nation is dependent upon a strong economy and investments in industry and infrastructure. All of these goals are supported by the steel industry, and it needs to have protection from the proposed rules until such time as a proper review can take place.

The unprecedented and exorbitant costs that U. S. Steel would need to incur to attempt to comply with the Taconite RTR Rule would risk U. S. Steel losing viable commercial production capabilities and will jeopardize the domestic industry's ability to meet the full spectrum of infrastructure and investment needs. Ensuring that U. S. Steel and other steel producers are able to continue to produce steel in the market for U.S. commercial and infrastructure needs is necessary to grow the U. S. market and economy.

The Taconite RTR Rule, as well as the other rules affecting the domestic steel industry, will result in unprecedented costs which will jeopardize the long-term operations of U. S. Steel (and other steel producers.) If U. S. Steel is not financially viable to invest in the latest technologies, facilities, and long-term research and development, nor retain skilled workers while attracting a next-generation workforce, it will be unable to support the nation's infrastructure, economy and commercial needs.

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C. Cumulative Burden

In 2024, EPA promulgated three new steel sector rules[3] resulting in dozens of new emission limits and work practices materially impacting the domestic iron and steel critical

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[2] Department of Commerce, Bureau of Export Administration: *The Effect of Imports of Iron Ore and Semi-Finished Steel on the National Security*, October 2001

[3] The three rules at issue are:

1) National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities (EPA-HQ-EPA-OAR-2002-0083), April 3, 2024, *Federal Register*, (89 Fed. Reg. 23294)