United States Senate

WASHINGTON, DC 20510

December 6, 2023

The Honorable Michael S. Regan
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

Dear Administrator Regan:

We write to you today regarding the U.S. Environmental Protection Agency's (EPA) three proposed rules related to steel manufacturing and related supply chains. We have serious concerns with these proposed rules because they would dramatically undermine the domestic steel industry and national security while driving production overseas likely resulting in no net reduction in emissions from the steel industry globally. Reducing the emission of harmful air pollutants should be done based upon sound science and with proven technology that is both technically and economically feasible. The irony is that the United States' steel industry is world's cleanest major producer of steel[1]. American steel manufacturers take seriously their commitment to protecting the environment; however, rules that drive production overseas are bad for our economy, bad for national security, and bad for the environment.

These rules:

1) National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities (EPA-HQ-EPA-OAR-2002-0083), 2) National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries. (EPA HQ OAR 2002 0085 and EPA HQ OAR 2003 0051), and 3) National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing Amendments (EPA-HQ-OAR-2017-0664), if finalized as proposed, would require billions of dollars in capital investments and increased annual operating costs for the U.S. steel industry.

We support reducing harmful air pollution. We also support rules that are durable, realistic, and based upon proven technology and reflect a consensus view among stakeholders on how to best improve public health while protecting good paying jobs and supporting industries essential to our national and economic security. These rules fail to meet those standards.

As you move forward with these rulemakings, we urge you to take an inclusive approach – working directly with major stakeholders in developing technically-sound final rules that achieve further emissions reductions while not harming the competitiveness of our American steel companies. Written properly, regulations can help American steel manufacturers lead the world in clean steel production. Poorly written rules undermine domestic manufacturing and promote reliance upon inputs made by foreign manufacturers manufacturers that pollute more than their American counterparts. Regulations that cost

[1] "Steel Climate Impact - An International Benchmarking of Energy and CO_2 Intensities." Found at: https://www.bluegreenalliance.org/wp-content/uploads/2022/04/Steelclimateimpact-benchmarkingreport7April2022.pdf

American jobs, undermine national security, and are likely to result in no net reduction in emissions globally must be rejected.

Sincerely,

Sherrod Brown
United States Senator

J.D. Vance
United States Senator

Mike Braun
United States Senator

Joe Manchin
United States Senator

Robert P. Casey, Jr.
United States Senator

Amy Klobuchar
United States Senator

Shelley Moore Capito
United States Senator

Todd Young
United States Senator