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March 31, 2025

U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW
Washington, DC 20460
Submitted by Electronic Mail to: airaction@epa.gov

Re: Presidential Exemption: 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 FR 55684; July 5, 2024) (Coke Ovens Rule)

Cleveland-Cliffs Inc. hereby requests a Presidential Exemption under Clean Air Act (CAA) section 112(i)(4) for Cleveland-Cliffs Burns Harbor LLC; Cleveland-Cliffs Cleveland Works LLC, Warren Location; and Cleveland-Cliffs Monessen Coke LLC (collectively "Cleveland-Cliffs") from compliance with the standards and limitations in 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) (collectively, the "Coke Ovens Rule").

Cleveland-Cliffs operates three coke oven plants that feed our five integrated steel mills across Indiana, Michigan, and Ohio. We also purchase coke from merchant suppliers including Sun Coke and ESS Coke. Cliffs invested \$1 billion to build a facility to produce Hot Briquetted Iron (HBI), consumption of which in our furnaces has reduced coke consumption. However, Cliffs' ironmaking operations must still rely on coke as a key raw material to meet critical production needs.

On July 5, 2024, EPA promulgated the final Coke Ovens Rules, which establishes:

- 1) New maximum achievable control technology (MACT) standards for acid gases (AG), dioxin and furans (D/F), formaldehyde, hydrogen cyanide (HCN), mercury (Hg), polycyclic aromatic hydrocarbons (PAH), and volatile organic HAP (VOHAP) from coke oven pushing operations;
- 2) MACT and work practice standards for AG, D/F, HCN, Hg, PAH, particulate matter (PM), HAP metals, and VOHAP from coke oven battery stacks;
- 3) New facility fence-line emission monitoring and corrective action requirements; and

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