

iron and steelmaking process, it is imperative that EPA grant both the petitions for reconsideration and requests for stay of the rules.”⁷ Similar concerns were raised in a letter to EPA from Congress Members Crawford and Mrvan of the Congressional Steel Caucus.⁸

Without a Presidential Exemption, the Coke RTR Rule would require immediate actions by U. S. Steel that unfairly burden U. S. Steel, impose actions that are either unsafe, unlawful, impossible, impractical and/or are ineffective; and require U. S. Steel to spend tens of millions if not hundreds of millions of dollars on unproven technologies, thereby impacting its ability to support the nation’s growing economy, infrastructure needs, and continued thriving national investments.

CONCLUSION

Thank you for the opportunity to provide this Request for a Presidential Exemption. The bases of granting an exemption are well grounded in the facts that support a clear finding that the technologies to implement the Coke RTR Rule are not available, and because of the financial and infrastructure implications, it is in the interest of national security to grant the request. Furthermore, while not a factor specifically listed as a basis for the exemption, it is important to note that granting the request will not result in any unacceptable risks to the public or the environment as EPA has determined that the integrated iron and steel source category presents acceptable risks with an ample margin of safety with the present controls, and requirements and limits already in effect to which U. S. Steel consistently demonstrates compliance. If you have questions or need additional information, please contact me (412) 233-1200.

Sincerely,



Matthew J. DeLibero
U. S. Steel Mon Valley Works
Director Environmental, Reliability, & Operational Excellence

cc: A. Szabo, EPA OA
J. Schwab, EPA OA
A. Tardif, EPA OAR
S. Hamilton, EPA OAR
P. Tsirigotis, EPA OAQPS

⁷ Letter from U.S. Senators Vance, Brown, Braun, Casey, Klobuchar, and Young to Administrator Regan, p. 2 (June 14, 2024) (Att. B).

⁸ Letter from Congressmen Crawford and Mrvan to Administrator Regan, p. 1 (Dec. 18, 2023) (Att. C).