data demonstrating that even the best performing sources are not able to continuously achieve the new limits. [12] In addition, new limits set by the Rule, even assuming technology existed, pose safety dangers in the facilities in direct conflict with the CAA's General Duty Clause in Section 112(r).

The affected sources and specific UFIP control feasibility issues are summarized as follows:

- **Unplanned Bleeder Valve Openings:** Bleeder valves are emergency release devices that relieve pressure from a BF to prevent explosions or other catastrophic events. EPA took the extraordinary step of attempting to set numeric limits on the unplanned opening of bleeder valves, pitting environmental compliance against worker health and safety, by discouraging valve opening, in direct conflict with the stated intent of Congress (H.R. 101-490, Part 1 (328)). However, technical data demonstrates that three of four MACT Floor (or "best performing") sources for large BFs cannot achieve this limitation and are therefore unachievable without adding control equipment.[13] Specifically, bleeder valves are intended to reduce the risk of catastrophic overpressure conditions in a BF. Not only are the limits unachievable, but experts have explained that the work practice standards "prescribes technologies that may not result in the reduction of valve openings or may be infeasible on certain BF units."[14] Moving forward with the limits in the rulemaking will require the application of control equipment which is not commercially available.

- **Planned Bleeder Valve Openings:** Not only are the standards unrepresentative of the data, but the calculation of the opacity standard for planned bleeder valve openings used a calculation method that did not adequately account for the underlying long-term operational variability. This incorrect calculation directly resulted in three of the five MACT Floor sources for Blast Furnaces being unable to achieve this limitation.[15] Moving forward with the limits in the rulemaking will require the application of control equipment which is not commercially available.

- **Iron Beaching:** Emissions generated by the transfer and pouring of hot molten iron (beaching) are not only de minimis in nature but were already adequately controlled by existing work practices that require flexibility in approach given the spacing and safety limitations based on different facility configurations. EPA's proposed technologies include "infeasible (and unsafe) enclosure of beaching operations and/or installation of CO2 suppression."[16] This is particularly the case where [t]he installation of enclosures would be infeasible at facilities with space limitations," such as four of the eight facilities with such limited space that the "retrofit construction of an enclosure [is] virtually impossible."

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[12] *See* AISI Comments; Cliffs' Petition for Reconsideration; Cliffs' Motion for Stay; and Cliffs' Reply for detailed technical support regarding the fundamental flaws with the II&S Rule UFIP limits.
[13] *See* Declaration of Mike Remsberg of Trinity Consultants, p. 6-7 (June 18, 2024) (attached as Exhibit D to Cliffs' Motion for Stay.)
[14] *Id.* at 7.
[15] *Id.* at 7.
[16] *Id.*