

112(i)(4) for the Taconite RTR Rule for the two above-referenced taconite processing facilities owned and operated by U. S. Steel.

EXECUTIVE SUMMARY

U. S. Steel is respectfully requesting a two-year Clean Air Act § 112(i)(4) Presidential Exemption from all of the 2024 amendments to the Taconite RTR Rule - because, as U. S. Steel has clearly shown in prior submissions to EPA, no taconite iron ore processing facility is actually meeting the new HAP limits; nor does any taconite iron ore processing facility employ technology that demonstrates the limits can consistently be met. Furthermore, even outside the taconite iron ore industry, no technology exists that has demonstrated that the limits can consistently be met. U. S. Steel's efforts to comply with the 2024 amendments to the Taconite RTR Rule would result in significant, adverse financial and operational impacts to the company and the domestic steel industry. Without a Presidential Exemption, U. S. Steel's and the domestic steel industry's ability to provide for infrastructure, investments and national security would be significantly compromised

EXEMPTION REQUEST

The President has the authority to grant Presidential Exemptions from NESHAP emissions standards of up to two years pursuant to Clean Air Act (CAA) § 112(i)(4) and 40 C.F.R. § 63.6(j).

U. S. Steel is requesting a two-year Presidential Exemption, with the possibility to extend the exemption for additional periods if necessary and appropriate as authorized under the Clean Air Act, for the Taconite RTR Rule compliance requirements for its two taconite processing facilities, as identified above. Compliance with the amendments would require the installation and operation of technology that is not available and would impose requirements that are impractical, if not impossible. U. S. Steel specifically requests a two-year Presidential Exemption to the amendments to the 2024 National Emission Standards for Hazardous Air Pollutants (NESHAP) for its Taconite Processing including:

- New mercury limits and requirements (*See amendments to 40 CFR 63 Subpart RRRRR including but not limited to the following provisions as applied to the new mercury standard §§ 63.9590, 63.9591, 63.9600 through 63.9625; 63.9630 through 63.9637; 63.9640 through 63.9643; 63.9650 through 63.9652; and Table 2*)
- New hydrogen chloride and hydrogen fluoride limits and requirements (*See amendments to 40 CFR 63 Subpart RRRRR including but not limited to the following provisions as applied to the new hydrogen chloride and hydrogen fluoride standards §§ 63.9590, 63.9591, 63.9600 through 63.9625; 63.9630 through 63.9637; 63.9640 through 63.9643; 63.9650 through 63.9652; and Table*