

to achieve the very low levels of HAP emissions from taconite furnaces is far from demonstrated in practice and may not be achievable for many taconite furnaces. Accordingly, a minimum of a two-year extension of time for compliance is clearly appropriate for all affected sources in the Taconite Iron Ore Processing industry. For additional information on issues with control technologies in the taconite processing industry refer to *Comments of AISI and U. S. Steel*, (July 7, 2023), Docket No. EPA-HQ-OAR-2017-0664-0181.

For all the reasons stated above, none of the technologies identified to implement standards in the Taconite Rule are available within the period between the present and the compliance date of March 8, 2027, and an exemption should be granted extending the compliance date until March 8, 2029, to all the sources on the attached list, while EPA reconsiders the Taconite Rule.

**B. IT IS IN THE NATIONAL SECURITY INTERESTS OF THE UNITED STATES
TO PROVIDE AN EXEMPTION FROM THE TACONITE RULE COMPLIANCE
DATE**

The impact of the Taconite Rule is far-reaching and undermines the country's national security interests given that taconite is an essential raw material for the integrated iron and steel industry, an industry critical to national security. The U.S. Department of Commerce recognized that domestic steel production is essential for national security applications, which it indicated encompasses transportation systems, the electric power grid, water systems, and energy generation systems in its report summarizing the findings of an investigation conducted by the Department of Commerce pursuant to Section 232 of the Trade Expansion Act of 1962, as amended (19 U.S.C. § 1862 ("Section 232")), into the effect of imports of steel mill products ("steel") on the national security of the United States.¹ In a 2021 Congressional Research Service Report on United States Steel Manufacturing: National Security and Tariffs, it was noted that under the Defense Production Act, 50 U.S.C. §4533, "Congress provides the President with a broad set of authorities ..., including Title III, which authorizes the use of economic incentives to secure domestic industrial capabilities essential to meet national defense and homeland security needs. DOD has funded several Title III projects to increase domestic production of steel products," including a \$56 million agreement in 2020 to boost steel plate production signed by the predecessor owner of a Cliffs' facility.²

Ensuring the strength and global competitiveness of this industry is of vital importance to the nation's economy, security, and manufacturing prowess. Supporting this is the fact the industry provides more than **\$520 billion** in economic output, nearly **two million jobs**, more than **\$130 billion in wages and benefits** to employees, and **\$56 billion in federal, state and local taxes**. Cliffs alone employs approximately 27,000 people, most of whom are members of

¹ See U.S. Department of Commerce Bureau of Industry and Security Office of Technology Evaluation, *The Effect of Imports of Steel on the National Security Report*, Report by the January 11, 2018, https://www.commerce.gov/sites/default/files/the_effect_of_imports_of_steel_on_the_national_security_-_with_redactions_-_20180111.pdf

² Congressional Research Service Report, *U.S. Steel Manufacturing: National Security and Tariffs* (August 12, 2021), <https://www.congress.gov/ers-product/1F11897>