CLIFFS

CLEVELAND-CLIFFS INC.

March 31, 2025

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

REQUEST FOR PRESIDENTIAL EXEMPTION: National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing, EPA Docket No. EPA-HQ-OAR-2017-0664, RIN 2060-AT05, 89 Fed. Reg. 16,408 (March 6, 2024) on behalf of the Cleveland-Cliffs Major Source Taconite Iron Ore Processing facilities

Pursuant to Section 112(i)(4) of the Clean Air Act ("CAA"), Cleveland-Cliffs Inc. ("Cliffs") hereby requests a two-year exemption from the current March 8, 2027, compliance date of emissions standards promulgated in the final rule *National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing* (the "Taconite Rule"), published in the *Federal Register* at 89 Fed. Reg. 16,408 (March 6, 2024), extending the compliance date to March 8, 2029, for each Taconite Iron Ore Processing plant subject to the rule, pending EPA's reconsideration of the rule. Cliffs operates six of the eight Taconite Processing facilities in the United States. Cliffs and the American Iron & Steel Institute ("AISI") submitted several rounds of extensive comments and scientific data and analysis to U.S. EPA on the Taconite Rule that contain further support for this request.

Cliffs is a leading North America based steel producer that is vertically integrated from the mining of iron ore, production of pellets and direct reduced iron, and processing of ferrous scrap through primary steelmaking and downstream finishing, stamping, tooling and tubing. Cliffs owns and operates most of the Taconite Processing plants in the United States. These include the Taconite Iron Ore Processing facilities in Minnesota (United Taconite, Northshore Mining, Hibbing Taconite (85.3% owned) and the Minorca Mine) and Michigan (the Tilden Mine and Empire Mine). Cliffs asks that the requested Presidential exemption be granted for each of these taconite processing plants to provide needed relief from the 2024 version of the Taconite Rule.

As explained below, a Presidential exemption under CAA § 112(i)(4) is appropriate for sources impacted by the Taconite Rule because the technology to implement the new emission standards added in 2024 is not available, and Cliffs must spend tens of millions of dollars now to evaluate potential compliance pathways for the current 2027 compliance target. Protecting the