



March 31, 2025

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

RE: REQUEST FOR PRESIDENTIAL EXEMPTION from "National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review" (89 FR 23294; April 3, 2024) on Behalf of Cleveland-Cliffs Inc. Integrated Iron and Steel Manufacturing Facilities¹

Pursuant to Section 112(i)(4) of the Clean Air Act ("CAA"), Cleveland-Cliffs Inc. ("Cliffs") hereby requests that the President issue a two-year exemption from the compliance deadlines for emission limits and work practice standards promulgated in the final rule "*National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review*" (the "II&S Rule"), published in the *Federal Register* at 89 Fed. Reg. 23,294 (April 3, 2024). This request encompasses extending the compliance dates by two years for each of Cliffs' integrated iron and steel manufacturing ("II&S") plants subject to the rule, pending EPA's reconsideration of the II&S Rule. Cliffs and the American Iron & Steel Institute ("AISI") submitted several rounds of extensive comments and scientific data and analysis on the II&S Rule.

Cliffs is a leading North America-based steel producer and owns five of the eight II&S facilities in the United States (the other three are operated by a separate steel company, which will submit a separate request). Cliffs' facilities include Burns Harbor and Indiana Harbor East and West in Indiana, Cleveland Works and Middletown Works in Ohio, and Dearborn Works in Michigan.

This request explains why an exemption is appropriate for Cliffs' sources impacted by the II&S Rule, because, as specified in section CAA §112(i)(4), the technologies to implement the standards are not available and an exemption is in the national security interests of the United States.

¹ Cleveland-Cliffs Inc. Facilities: Cleveland-Cliffs Burns Harbor Inc.; Cleveland-Cliffs Cleveland Works LLC; Cleveland-Cliffs Steel Corp. Dearborn Works; Cleveland-Cliffs Steel LLC-Indian Harbor East and West; Cleveland-Cliffs Holdings Corp. Middletown Works.