schedule to implement the Coke RTR Rule because that time is necessary for facilities to, among other things, better determine process and raw material variability impacts on emissions, evaluate additional emission controls and to assess technical feasibility and to test, engineer, permit, fabricate, and install the new equipment and other controls before the date compliance is required. Additional compliance time would also be needed to retrofit new equipment into existing facilities with limited space and to allow facilities to streamline and consolidate compliance testing of battery stacks and pushing emission control devices with other required source testing. The Presidential Exemption is necessary to account for these factors and to prevent irreparable harm to the domestic steel industry; and is appropriate as EPA reviews petitions for reconsideration.

THE EXEMPTION IS IN THE INTEREST OF NATIONAL SECURITY

A. The Clairton Plant is Vital to the Production of Steel at U. S. Steel

U. S. Steel's Clairton plant is the largest coke plant in North America. The Clairton plant is an essential operation of U. S. Steel and is critical for U. S. Steel to produce steel. The Clairton Plant operations have a tremendous impact on the local, regional, and national economy. The Clairton Plant employs approximately 1,400 highly skilled United Steelworker union-represented and non-represented employees. Since the Clairton Plant is the nation's largest producer of coke and coal chemicals, its operations have a multiplier effect in supporting thousands of additional steel plant, chemical, energy, transportation, and supplier jobs, not only in the Clairton area in Allegheny County, and the Southwestern Pennsylvania region, but also across the United States.

B. U. S. Steel Contributes to the Economic Security of the United States, and Economic Security is National Security

U. S. Steel is a leading steel manufacturer in the United States and Europe. U. S. Steel has over 22,000 dedicated employees and produces over 1,000 grades of steel. For more than 100 years, while consistently meeting new challenges, U. S. Steel has been a vital part of America's history, economy, and infrastructure. U. S. Steel's operations located throughout the United States include, among others, coke production, taconite production and integrated iron and steel production, which contribute to the U.S. economy and key industries.

Continued domestic coke production, including the production by U.S. Steel, is critical to national infrastructure investments and national economic growth. The domestic steel industry is responsible for over $520 billion in economic output, supporting over 2 million jobs. It generates over $56 billion in tax revenues annually. U. S. Steel specifically supplies steel to the U.S. transportation and automotive sectors, including major U.S. automakers; the construction sector; containers and packaging sector; appliances and electrical equipment sector; and oil, gas, and petrochemicals sector. For these industries which are critical to U.S. economic security U. S. Steel provides high quality domestically produced steel. U. S. Steel is also a major contributor to the communities in which it operates – including, among others, those in Alabama, Arkansas, Pennsylvania, Indiana, Illinois, and Michigan directly and indirectly supporting jobs and economic growth, which underpin the United States' economic security. As stated in the