operations in the United States. A Presidential Exemption is necessary to prevent significant direct adverse impacts and irreparable harm to domestic steel production and infrastructure.

The promulgation of these three rules, simultaneously with other recent significant EPA actions, including most notably, the lowering of the PM2.5 NAAQS and the adoption of the overreaching Good Neighbor Rule, harm the competitiveness of the domestic steel industry and jeopardizes the domestic steel industry's ability to support the economy, growth, and critical needs of the nation. These rules, individually and collectively, result in marginal, if any, benefits, yet result in unprecedented capital expenditures of billions of dollars for the domestic steel industry. These draconian job-killing unlawful rules were promulgated notwithstanding that EPA determined that the existing MACT regulations provide acceptable risks with an ample margin of safety.

In addition, it is significant to note that in 2020 EPA previously completed its statutory obligation to determine risks and to review technological developments for the taconite and integrated iron and steel categories, and determined that no significant revisions to these rules were necessary. However, in 2024, EPA unilaterally reversed course and mandated that the industry comply with dozens of new limits and requirements that will require hundreds of millions if not billions in capital expenditures and even then compliance with some of the new limits cannot be assured as the limits are based upon insufficient data and are based upon unproven, untested technologies for the limits imposed. If left in place, the domestic steel industry may be left to choosing between prematurely shuttering mills, resulting in job losses and irreparable harm to their local communities, or making huge investments to develop technologies that have no proven application to the steel sector. In short, these rules stand to paralyze an industry that currently leads the world in the pathway to clean steel production. These rules, if left in place, would further skew the market to the benefit of foreign manufacturers and state-owned enterprises, in particular, Chinese state-owned steel producers, which dominate the global steel industry – and which are held to less stringent environmental standards.

Without a Presidential Exemption, the Taconite RTR Rule would create significant, unprecedented burdens for domestic steel industry and manufacturers and negatively impact the workforce, who are a vital part of the U.S. economy. In addition, the Taconite RTR Rule would substantially raise costs to consumers across the country and would likely cause harm to the domestic economy and supply of materials for infrastructure and growth.

To comply with these rules, the domestic taconite and integrated iron and steel industry will be forced to spend billions of dollars in capital investments and increased annual operating costs without yielding any appreciable improvement to air quality or reduction in risks. The detrimental impacts are immediate and substantial as the industry is being forced to consider the

2) National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries. (EPA HQ OAR 2002 0085 and EPA HQ OAR 2003 0051). July 5, 2024. *Federal Register*, (89 Fed. Reg. 55684); and
3) National Emission Standards for Hazardous Air Pollutants: Taconite Iron Ore Processing Amendments (EPA-HQ-OAR-2017-0664), March 6, 2024, *Federal Register*, (89 Fed. Reg. 16408).