

with personnel exposure requirements, or to make recommendations for additional protective equipment.

14. Safely implementing enclosures of this magnitude takes time. Based on my prior experience installing existing enclosures at the Facility, the process safety concerns, and the necessary design, review, and approval process, I estimate a period of at least two years—and more likely 30-36 months—would be required before such enclosures could be installed in tandem with the additionally required thermal oxidizer.

15. The rest of the ERPs previously evaluated following the Proposed Rule would still require the same costs and time previously estimated.

16. The requirements of the Final Rule do not alter my opinion that EPA's proposed Statement of Final Relief requires emission reductions that are not feasible and may be impossible. *See Remedy Declaration ¶ 10.*

17. I reserve the right to further supplement this Declaration.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on February 13, 2025.


CHRIS MEYERS, P.E.



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To Whom It May Concern,

Please see the attached request from U.S. Steel for a Presidential Exemption for the Coke MACT for U.S. Steel's Clairton, PA Facility. Let us know if you have any questions.

Best Regards,

Matthew DeLibero

Matthew J. DeLibero

Director Environmental, Reliability, & Operational Excellence

U.S. Steel Mon Valley Works

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