

will require application of novel treatments such as carbon lime and/or bicarbonate injection systems, which are not commercially available.

- **BF Stoves:** Together, the five Cliffs' facilities have seven (7) clusters of BF stoves, and there is no existing add-on emission control that is proven to meet the HAP limitations for hydrogen chloride or total hydrocarbons. Moving forward with the limits in the rulemaking will require application of novel treatments such as carbon lime and/or bicarbonate injection systems that are not commercially available.
- **Sinter Recycling Plants:** One Cliffs' facility, Burns Harbor, has a sinter recycling plant with a wet scrubber. This plant would need to install a new sinter plant windbox emission control system paired with activated carbon injection ("ACI") to meet the new standards. A fatal flaw, however, is that use of ACI is not actually feasible as an add-on control because there is not sufficient residence time for contact with the carbon and absorbing material (in this case, mercury, dioxin/furan, and/or polycyclic aromatic hydrocarbons). The technology of ACI is primarily intended for use with recirculating baghouses and the effects when paired with a wet scrubber are unclear and may include negative consequences such as unintended localized emissions and significant carbon waste generation in the resulting sludge.

As noted above and in more detail with our numerous technical reports and declarations⁸, the II&S Rule "will require development and installation of unproven control technologies that have never been installed domestically or internationally for these source categories."⁹ Cliffs must evaluate, develop, trial, permit, design, procure, fabricate, and install novel technology and emission control systems. This industry specific technology which may or may not achieve the standards in the end needs to be developed for the first time.¹⁰ EPA's erroneous assumptions about the transfer of control technology demonstrate a poor understanding of this industry sector and warrant time for thorough reconsideration. A Presidential exemption is important to achieve this extended timeline.

2. Technology to Implement UFIP Standards Is Not Feasible

For the UFIP sources, the opacity limitations and work practice standards are so fundamentally flawed that there is no existing technology capable of complying with the Rule. In order to meet the UFIP standards, experts have opined that "[s]ources unable to achieve compliance with the final standards may require the development and implementation of control equipment or control measures that has never been applied in the II&S industry."¹¹ Cliffs submitted

⁸ See AISI Comments, Docket No. EPA-IIQ-OAR-2002-0083-1631; Cliffs' Reconsideration Petition to EPA (June 3, 2024); Cliffs' Motion for Stay, Case No. 24-1170 (D.C. Cir.) (June 28, 2024); Cliffs' Reply in Support of Stay, Case No. 24-1170 (D.C. Cir.) (September 19, 2024), and associated exhibits/attachments.

⁹ Declaration of David Mysko, P.E. of Hatch Associates Consultants, Inc. (Sept. 17, 2024) (attached as Exhibit I to Cliffs' Reply).

¹⁰ See Declaration of Stephen Palmer, Cleveland-Cliffs Enterprise Director Engineering (June 13, 2024) (attached as Exhibit C to Cliffs' Motion for Stay).

¹¹ See Declaration of Mike Remsburg of Trinity Consultants (Sept. 17, 2024) (attached as Exhibit M to Cliffs' Reply).