

established MACT parameters used for the control of particulate matter. Yet the Taconite RTR Rule will require Minntac to treat billions of gallons of water annually to maintain pH levels. This is not only a waste of money and materials, it could needlessly create billions of gallons of contaminated water with additional dissolved solids, potentially interfering with current recycling efforts at Minntac and creating a significant new ecological burden to treat or dispose of water that previously could have been used as process water. There is no technology available to be able to implement the Taconite RTR Rule's pH operating limits and monitoring requirements.

Furthermore, the Taconite RTR Rule also does not allow sufficient time to implement the pH monitoring requirements. It is likely that the pH treatment called for by the Taconite RTR Rule will require permitting that may take years, making the current deadline unachievable due to circumstances beyond U. S. Steel's control.

EPA has not shown that the practice of pH operating limits and monitoring to meet any hydrogen chloride or hydrogen fluoride limits is actually implemented and achieved in practice. Even under EPA's reading of the Clean Air Act, which U. S. Steel disagrees with, EPA must show that the requirements it is imposing are the "emission control that is achieved in practice by the best controlled similar source." 42 U.S.C. § 7412(d)(3). EPA has no record basis for finding that the requirements in the Taconite RTR Rule meet this requirement.

THE EXEMPTION IS IN THE INTEREST OF NATIONAL SECURITY

A. U. S. Steel's Taconite Iron Ore Processing Facilities are Vital to the Production of Steel at U. S. Steel

The Minntac and Keetac taconite iron ore processing facilities are essential operations of U. S. Steel; and are critical for U. S. Steel to produce steel. U. S. Steel's taconite iron ore processing steel facilities have a tremendous impact on the local, regional, and national economy. These facilities employ approximately 1,900 employees. In addition, taconite iron ore processing operations have a multiplier effect in supporting thousands of additional steel, maintenance, construction, energy, transportation, and supplier jobs, not only in the northern Minnesota region in which they are located, 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 production, including the production by U.S. Steel, is critical to national infrastructure investments and national economic growth. The domestic steel industry is