The threat of global steel imports raised by the Senators in the letters to EPA is a material threat. Foreign steel imports risk the competitiveness and advancement of the domestic steel industry, to the point of potentially threatening U.S. domestic production capacity and continued investment in taconite iron mining, coke manufacturing, and iron and steelmaking capacity based on the costs outlined above. As emphasized by the U.S. Department of the Treasury's Committee on Foreign Investment in the United States ("CFIUS"), without such domestic steelmaking investment, there could be ripple effects on the supply chains that depend on such steel, particularly supply chains that are part of our national defense infrastructure such as "critical manufacturing, energy, transportation, and communications (all vital to national security)." [12] National defense infrastructure, for example, needs ready access to high purity steel from blast furnaces. [13] Once these complex iron and steel making operations are shut down and/or idled, it is no simple matter to restart them. In short: "The loss of domestic production is a critical national security concern given the ubiquitous nature of steel throughout multiple critical industries."[14]

IV. Conclusion

For all the reasons stated above, Cliffs urges the issuance of a 2-year exemption from the compliance deadlines in the Coke Ovens Rule, pending EPA's review of the rule.

Thank you for your consideration of this Presidential Exemption request. If additional information is needed, please contact Walter Tamukong at walter.tamukong@clevelandcliffs.com or 216-649-4862.

Sincerely,

Traci L. Forrester
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[12] Letter from Andrew Fair, Acting Assistant Secretary for Investment Security, U.S. Department of the Treasury, to Ama Adams, Ropes & Gray LLP, and Mark Plotkin, Covington & Burling LLP, Re: CFIUS Case 24-154 (Dec. 14, 2024) ("CFIUS Letter"), p. 28.
[13] *See id.* at p. 24.
[14] *Id.* at p. 28.