

EXECUTIVE SUMMARY

U. S. Steel is respectfully requesting a two-year Clean Air Act § 112(i)(4) Presidential Exemption from all of the 2024 Coke MACT amendments -the Coke RTR Rule- because, as U. S. Steel has clearly shown in prior submissions to EPA, no coke plant is actually meeting the HAP limits; nor does any coke plant employ technology that demonstrates the limits can consistently be met. Furthermore, even outside the coke industry, no technology exists that has demonstrated that the limits can consistently be met. U. S. Steel's efforts to comply with the 2024 amendments to the Coke RTR Rule would result in significant, adverse financial and operational impacts to the company and the domestic steel industry. Without a Presidential Exemption, U. S. Steel's and the domestic steel industry's ability to provide for the critical infrastructure, investments and national security would be significantly compromised.

EXEMPTION REQUEST

The President has the authority to grant exemptions from NESHAP emissions standards of up to two years pursuant to Clean Air Act (CAA) § 112(i)(4) and 40 C.F.R. § 63.6(j).

U. S. Steel is requesting a two-year Presidential Exemption, with the possibility to extend the period for additional periods if necessary and appropriate as authorized under the Clean Air Act, of the following Coke RTR Rule compliance requirements for U. S. Steel's Mon Valley Works Clairton Coke Plant, 400 State Street, Clairton, Pennsylvania 15025:

1. July 7, 2025, compliance date to begin fenceline monitoring (*see* § 63.314);
2. July 7, 2025, compliance date to begin complying with the revised limits for allowable leaks from coke oven battery doors, lids, and offtakes and related reporting (*see* § 63.302(a)(4), § 63.302(d), § 63.304(b)(8), and § 63.311(h); and
3. January 5, 2026, and July 7, 2026, compliance dates to begin complying with MACT standards for sources in the PQBS NESHAP and related reporting (*see* § 63.7283(d), § 63.7341(f), and § 63.7300(c)(4)).

A two-year Presidential Exemption of these compliance dates is necessary and appropriate to prevent irreparable harm to the domestic metallurgical coal and domestic steel industry and is supported for the reasons provided below.

BACKGROUND

In CAA § 112(i)(4), Congress gave exclusive authority to the President to "exempt any stationary source from compliance with any standard or limitation under this section [Clean Air Act Section 112] for a period of not more than 2 years if the President determines that the technology to implement such standard, which has been recognized as including "unavailable in time for