

18. 2025). In that proclamation, President Trump again exercised his authority under section 232 to “adjust imports of steel and aluminum to protect our national security.”¹⁷

A thriving domestic coke industry is necessary to ensure that domestic steel is produced for critical industries. As noted above, SunCoke can meet those needs as the supplier of close to 40 percent of the current coke production for the steel industry. The MACT floor emission limits in the Coke Ovens Rule, however, could jeopardize the domestic coke industry’s ability to supply the amount of coke needed for domestic steel production. As this will be detrimental to the national security interests of the U.S., the administration should grant the two-year exemption to these limits as requested above.

4. Conclusion

We appreciate this administration’s strong commitment to domestic steel production and recognition of its importance for national security. Requiring SunCoke to comply with the new MACT floor emission limits and related obligations in the Coke Ovens Rule when the technology to do so is not available will harm domestic coke production and increase America’s reliance on foreign imports, thus impairing our national security. For these reasons and as set forth above, we therefore urge you under Clean Air Act Section 112(i)(4) to issue a two-year exemption for SunCoke from all compliance obligations under the Coke Ovens Rule for its metallurgical coke plants.

Sincerely,



Sarah Albert

cc: Katie Batten, Director of Environmental and Sustainability, SunCoke Energy

¹⁷ See Fact Sheet, <https://www.whitehouse.gov/fact-sheets/2025/02/fact-sheet-president-donald-j-trump-restores-section-232-tariffs/>. Vice President Vance has equally drawn the connection between domestic steel production and national security. In 2023, in his role as Senator of Ohio, Vice President Vance led a congressional letter recognizing that foreign acquisition of domestic steel assets would “threaten[] to impair the national security of the United States.” Letter from Sen. Vance to President Biden (May 9, 2024) (quoting 50 U.S.C. § 4565(d)(1)), available at <https://www.hawley.senate.gov/wp-content/uploads/files/2024-05/Hawley-Letter-to-Biden-re-Nippon-Steel-Takeover.pdf>. The Vice President also penned an op-ed in which he noted that “preservation of the domestic steel industry remains vital to our national security.” Sen. J.D. Vance, *America cannot afford to auction off its industrial base*, WASHINGTON POST (Sept. 5, 2023), <https://www.washingtonpost.com/opinions/2023/09/05/jd-vance-america-auction-industrial-base/>.