



ASSISTANT ADMINISTRATOR FOR AIR AND RADIATION

WASHINGTON, D.C. 20460

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Mr. James Pew, Esq.
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Dear Ms. Mantione, Mr. Lazzaretti, and Mr. Pew:

This letter concerns the petitions for reconsideration that you submitted to the Environmental Protection Agency (EPA) pursuant to section 307(d)(7)(B) of the Clean Air Act (“Act”) on behalf of your clients, Cleveland-Cliffs Inc., United States Steel Corp., and Clean Air Council, et al. The petitions seek reconsideration by the EPA of numerous issues related to the *National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review*, 89 Fed. Reg. 23294 (April 3, 2024) (“II&S Final Rule”).

The EPA has reviewed your reconsideration petitions and, to date, has not identified any information in those petitions that undermines the validity of the II&S Final Rule. In its discretion, however, the EPA has decided to reconsider certain aspects of the rule to, among other things, consider information submitted outside the comment period. The EPA will reconsider the following three aspects of the II&S Final Rule:

- Work practice standards for unmeasured fugitive and intermittent particulate (UFIP) from unplanned bleeder valve openings;
- Work practice standards for UFIP from beaching; and
 - Maximum Achievable Control Technology (MACT) emission limit for hydrochloric acid (HCl) point-source emissions from blast furnace (BF) casthouses.

We intend to issue a *Federal Register* notice soon to provide an opportunity for public comment on these issues.

Also, in light of certain errors and ambiguities in the II&S Final Rule that were brought to our attention by your reconsideration petitions, we intend to issue a correction notice within the next few months to do the following things:

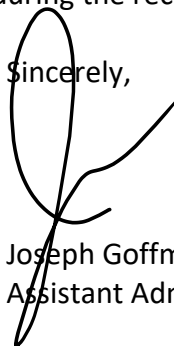
- Clarifying that the definition of an unplanned bleeder valve opening includes only those openings that are not located downstream from a control device (i.e., “dirty bleeder valve openings”);
- Clarifying the timing of planned openings and how they may affect opacity readings;
- Clarifying the definition of a single bleeder valve opening event;
- Deleting from Part 63, subpart FFF, Table 2 the emissions standard for “windbox exhaust stream” for BF casthouses, BF stoves, and basic oxygen process furnace (BOPF) shops because these sources do not have a windbox exhaust stream; and
- Clarifying the method that must be used to measure opacity for bell leaks.

The EPA staff will reach out to you to identify other potential issues that may be appropriate to address in the corrections notice and gather more information on these errors and ambiguities.

Given the large amount of complex data involved in developing the II&S Final Rule, as we prepare to reconsider aspects of the rule and develop the corrections notice, we may identify other issues suitable for reconsideration. This letter is not a denial of any issues raised in your petitions; as noted above, we are continuing to evaluate them. As described in the II&S Final Rule, the EPA also intends to further evaluate fugitive emissions of lead and other metals and opacity data from the BF casthouse and BOPF shop as a separate matter at a later time. 89 Fed. Reg. at 23305 & 23308-09.

If you have any questions regarding the reconsideration process, please contact Steve Fruh of my staff at (919) 541-2837 or fruh.steve@epa.gov. We thank you for your continuing interest in the II&S Final Rule and look forward to hearing from you during the reconsideration process.

Sincerely,



Joseph Goffman
Assistant Administrator