



National Tribal Air Association

Fact Sheet

The U.S. Environmental Protection Agency's *Proposed National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review*

Docket EPA-HQ-OAR-2002-0083

The comment deadline is **September 14, 2023**. Your comment letter can be submitted electronically to the Federal Rulemaking Portal: <https://www.regulations.gov/> OR via email to a-r-Docket@epa.gov.

Background

On July 12, 2023, the U.S. Environmental Protection Agency (EPA) proposed to amend the 2003 National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel (II&S) Manufacturing Facilities, which were previously amended when the EPA finalized the Residual Risk and Technology Review for this source category on July 23, 2020.

These proposed amendments address fugitive emissions of Hazardous Air Pollutants (HAP), metals, PM 2.5, and other unregulated HAP including mercury.

The EPA is proposing fenceline measurements for chromium – as a surrogate for other HAP metals, including arsenic and lead.

On May 20, 2003, the EPA issued the original air toxics standards for Integrated Iron and Steel Manufacturing Facilities and amended the rule on July 17, 2006. The amendments proposed in this action affect all facilities engaged in the production of steel from iron ore along with the processes of sinter production, iron production, and iron preparation (hot metal desulfurization).

There are nine manufacturing facilities affected by this rule which are owned by two entities, U.S. Steel Corporation and Cleveland-Cliffs Incorporated are the two parent companies of all the impacted sources with annual revenues of \$22 and \$23 Billion per year.

The proposal includes fenceline monitoring for metals but does not establish enforceable requirements for the monitoring.



The NTAA believes this rule as proposed does not adequately address the fugitive emissions from this source category. It believes the proposed rule does not provide for a legal emission limit for mercury and does not adequately address arsenic and lead emissions.

The EPA will accept comments on the proposed amendments until September 14, 2023.

Importance to Tribes

This proposed supplemental rule for the National Emission Standard for Hazardous Air Pollution (NESHAP) was finalized in 2022 to reduce air toxics emissions from 9 iron and steel sources to reduce emissions from these facilities. The fence-line communities are low income and minority populations which are disproportionately impacted by these facilities.

Although, there are no areas of Indian country in the vicinity of these sources that are large emitters of both particulate matter 2.5 and mercury, these emissions can be transported leaving Tribes with concerns about protecting hunting and fishing rights and other lifeways. Tribes with these concerns may also want to comment on this rule.

How to Comment on EPA's Proposed Rule

- Comments, identified by Docket ID No. EPA-HQ-OAR-2002-0083, by **September 14, 2023**.
- Go to <https://www.regulations.gov/> and follow the online instructions for submitting comments.
- Send comments by email to: a-and-r-Docket@epa.gov, Attention Docket ID No. EPA-HQOAR-2002-0083.
- Fax your comments to: (202) 566-9744, Attention Docket ID No. EPA HQ OAR-2002-0083
- Mail your comments to: EPA Docket Center, Environmental Protection Agency, Mail Code: 28221T, 1200 Pennsylvania Ave., NW, Washington, DC 20460, Attention Docket ID No. EPA-HQ-OAR-2002-0083.