



August 1, 2025

Lee Zeldin
Administrator
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington DC 20460

Re: Docket No. EPA-HQ-OAR-2002-0083: National Emission Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review: Interim Final Rule

Dear Administrator Zeldin:

The American Lung Association submits these comments in strong opposition to the U.S. Environmental Protection Agency's (EPA) interim final rule delaying compliance deadlines for the National Emission Standards for Hazardous Air Pollutants (NESHAP) for Integrated Iron and Steel Manufacturing Facilities. We urge the EPA to reverse this decision and immediately reinstate the original compliance dates finalized in the 2024 rule.

The Rule Undermines Critical Health Protections

Iron and steel manufacturing facilities are significant sources of hazardous air pollutants (HAPs), including benzene, mercury, hydrogen chloride (HCl), hydrogen fluoride, dioxins, furans, and fine particulate matter (PM_{2.5}). These pollutants are associated with cancer, cardiovascular disease, asthma attacks, impaired lung development in children, and premature death. Communities located near these facilities are already overburdened by industrial pollution and face some of the highest rates of asthma and pollution-related illnesses in the nation. Delaying the compliance for these facilities would only add to the individual and community costs associated with poor air quality and health outcomes.

The 2024 rule was finalized to close longstanding regulatory gaps for previously unregulated pollutants and processes by setting standards using the maximum achievable control technology (MACT). The standards cover toxic emissions from sinter plants, blast

furnace stoves, and basic oxygen process furnaces. Also included are work practice and opacity standards for unmeasured fugitive sources such as bell leaks, bleeder valve openings, and slag handling. The 2024 rule also requires fenceline monitoring for chromium to detect real-world emissions near communities.

Delaying these requirements by two additional years—until April 3, 2027—delays life-saving protections for communities. EPA estimates the delay will result in an additional 120 tons of HAP emissions over just the next two years.¹ Put another way, EPA admits that this delay will lead to communities being subjected to 120 tons of cancer-causing, lung-damaging pollution that could otherwise be avoided.

Communities Deserve Transparency

We are particularly concerned that the rule postpones fenceline monitoring requirements, which are critical for detecting uncontrolled emissions and ensuring accountability. EPA has acknowledged that fugitive and intermittent emissions from sources like bleeder valves and slag handling are difficult to quantify. That makes fenceline monitoring a necessity. Delaying this requirement clearly increases the risk that dangerous emissions will go undetected and unaddressed to the detriment of community health.

EPA Fails to Provide Adequate Justification for Delay

We recognize that several industry petitioners requested reconsideration of the 2024 rule. However, instead of considering specific technical clarifications through an open process, this interim final rule broadly delays nearly all key compliance deadlines. The interim final rule cites concerns about feasibility, but EPA had already concluded in 2024 that many of these standards could be met without new equipment and within one or two years.

The decision to grant a blanket delay under the “good cause” exemption of the Administrative Procedure Act is inappropriate in this case. The Agency has not demonstrated that the delay is necessary to prevent imminent harm. In fact, the real harm will fall on nearby communities exposed to toxic air pollution during the extended delay.

¹ Rayburn, K. & Postal Service. (2025b). Rules of practice before the Postal Service Board of Contract Appeals; corrections [Rules of Practice]. Federal Register, 90(126), 29486–29486.
https://www.epa.gov/system/files/documents/2025-06/neshap_integrated-iron-and-steel-manufacturing-facilities-technology-review_interim-final-rule_2025.pdf

Conclusion

EPA has a legal obligation under the Clean Air Act to reduce hazardous air pollutants and protect public health—especially in overburdened communities. Delaying enforcement of standards that the Agency has already determined are necessary and achievable undermines that responsibility.

We urge EPA to prioritize the health of children, families and workers living near these industrial facilities by withdrawing the interim final rule and reinstating the original 2025 and 2026 compliance deadlines for all standards finalized in the 2024 rule. If the agency needs to consider narrow technical changes, where appropriate, we urge you to undergo a limited reconsideration process with full public input rather than using interim final rules to broadly weaken enforcement.

Communities near integrated iron and steel facilities have waited too long for these overdue safeguards. They must not be made to wait even longer.

We appreciate the opportunity to comment.