June 22, 2018

The Honorable Morgan Griffith  
2202 Rayburn House Office Building  
Washington, DC 20515

Dear Representative Griffith:

On behalf of the U.S. producer members of the American Iron and Steel Institute (AISI), I am writing to express our support for your draft legislation to reform the permitting process for the EPA’s New Source Review (NSR) program. Your legislation would assist in facilitating the permitting evaluation process that will help our industry and other manufacturing sectors in modernizing existing facilities and investing in environmentally beneficial projects.

AISI serves as the voice of the North American steel industry in the public policy arena and advances the case for steel in the marketplace as the preferred material of choice. AISI also plays a lead role in the development and application of new steels and steelmaking technology. AISI is comprised of 21 member companies, including integrated and electric furnace steelmakers, and approximately 120 associate members who are either suppliers or customers of the steel industry.

Our industry supports your legislation’s provisions to streamline the emissions permitting evaluation practices for routine maintenance, repair and replacement (RMRR) rules, and to exclude pollution control projects from the modification definition. The lack of clarity posed by the current interpretations of RMRR has led to missed opportunities for growth and expansion at our member facilities in pollution reduction efforts. We also support your bill’s exclusion of Pollution Control Projects (PCPs) that result in net overall reduction(s) of air pollutants, or involve upgraded or rebuilt pollution control equipment or devices from the existing definition of “major modifications.” This would allow the industry to install environmentally beneficial technologies without the uncertainty that is present in the current NSR permitting process.

Again, thank you again for your leadership in drafting legislation to improve the EPA New Source Review (NSR) program. AISI and our member companies are pleased to support the legislation and look forward to working with you to advance the bill through the legislative process.

Sincerely,

Thomas J. Gibson

25 Massachusetts Avenue, NW  
Suite 800  
Washington, DC 20001  
Phone 202.452.7146  
Fax 202.463.6573  
E-mail tfgibson@steel.org  
www.steel.org

American Iron and Steel Institute

Thomas J. Gibson, Jr.  
President and Chief Executive Officer

Representing steel producers  
in Canada, Mexico and the United States