

**IN THE UNITED STATES COURT OF APPEALS  
FOR THE DISTRICT OF COLUMBIA CIRCUIT**

CLEVELAND-CLIFFS INC.	)	
	)	No. 24-1170
Petitioner,	)	
	)	
v.	)	
	)	
UNITED STATES	)	
ENVIRONMENTAL PROTECTION	)	
AGENCY, and MICHAEL S. REGAN,	)	
Administrator, United States	)	
Environmental Protection Agency	)	
	)	
Respondents.	)	

**PETITION FOR REVIEW**

Pursuant to Rule 15 of the Federal Rules of Appellate Procedure and section 307(b) of the Clean Air Act, 42 U.S.C. § 7607(b), Petitioner Cleveland-Cliffs Inc. hereby petitions this Court to review the final rule promulgated by the United States Environmental Protection Agency entitled “National Emissions Standards for Hazardous Air Pollutants: Integrated Iron and Steel Manufacturing Facilities Technology Review,” 89 Fed. Reg. 23,294 (April 3, 2024) (the “Final Rule”).

This petition is timely filed within 60 days from the date notice of promulgation of the Final Rule was published in the Federal Register. 42 U.S.C. § 7607(b)(1).

A copy of the Final Rule is attached hereto as Attachment A.

Dated: June 3, 2024

/s/Lianne Mantione

Lianne Mantione (D.C. Cir. No. 56153)

Douglas A. McWilliams (D.C. Cir. No. 49715)

Allen A. Kacenjar (D.C. Cir. No. 49708)

SQUIRE PATTON BOGGS (US) LLP

1000 Key Tower, 127 Public Square

Cleveland, Ohio 44114-1304

Telephone: (216) 479-8500

Facsimile: (216) 479-8780

lianne.mantione@squirepb.com

douglas.mcwilliams@squirepb.com

allen.kacenjar@squirepb.com

*Counsel for Petitioner Cleveland-Cliffs Inc.*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 3, 2024, the foregoing PETITION FOR REVIEW was served by a third-party commercial carrier, return receipt requested, on each of the following:

Michael Regan  
EPA Administrator  
Office of the Administrator (1101A)  
United States Environmental Protection Agency  
William Jefferson Clinton Federal Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Merrick Garland  
Attorney General  
United States Department of Justice  
950 Pennsylvania Avenue, N.W.  
Washington, D.C. 20530

Correspondence Control Unit  
Office of General Counsel (2311)  
United States Environmental Protection Agency  
William Jefferson Clinton Federal Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Debra Shore  
Regional Administrator  
United States Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Chicago, IL 60604

/s/Lianne Mantione  
*Counsel for Petitioner Cleveland-Cliffs Inc.*

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v.	)	
	)	
UNITED STATES ENVIRONMENTAL	)	
PROTECTION AGENCY, and	)	
MICHAEL S. REGAN, Administrator,	)	
United States Environmental Protection	)	
Agency	)	
	)	
Respondents.	)	

**DISCLOSURE STATEMENT PURSUANT TO RULE 26.1**

Pursuant to Federal Rule of Appellate Procedure 26.1 and D.C. Circuit Rule 26.1, the undersigned counsel represents that Petitioner Cleveland-Cliffs Inc. is a publicly held, non-governmental corporate party to the above-captioned proceeding. No parent corporation owns 10% or more of Petitioner's stock. Blackrock Inc., a publicly held corporation, owns 10% or more of Petitioner's stock.

Dated: June 3, 2024

/s/Lianne Mantione

Lianne Mantione (D.C. Cir. No. 56153)  
 Douglas A. McWilliams (D.C. Cir. No. 49715)  
 Allen A. Kacenjar (D.C. Cir. No. 49708)  
 SQUIRE PATTON BOGGS (US) LLP  
 1000 Key Tower, 127 Public Square  
 Cleveland, Ohio 44114-1304  
 Telephone: (216) 479-8500  
 Facsimile: (216) 479-8780  
 lianne.mantione@squirepb.cm

douglas.mcwilliams@squirepb.com

allen.kacenjar@squirepb.com

*Counsel for Petitioner Cleveland-Cliffs Inc.*

**CERTIFICATE OF SERVICE**

**I HEREBY CERTIFY** that on June 3, 2024, the foregoing DISCLOSURE STATEMENT Pursuant to Rule 26.1 was served by a third-party commercial carrier, return receipt requested, on each of the following:

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/s/Lianne Mantione  
*Counsel for Petitioner Cleveland-Cliffs Inc.*