pass, but an insufficient amount of data category), or where there is simply no data at all (i.e., the **no data** category), I anticipate that SunCoke may need to spend as much as $874,000,000 to bring its facilities into compliance.

43. All told, depending on what additional testing reveals, SunCoke could be required to spend $1,200,000,000 to bring its facilities into compliance.

44. To design, test, and install such significant controls would require at least 6–7 years. And it is not clear that SunCoke could obtain the supplies it would need—which could further extend the compliance timeline.

45. To be clear, it is not known at this time whether SunCoke will be forced to spend such exorbitant sums. But this places SunCoke in an untenable position because the compliance deadline of December 5, 2025, is not far away. Without more testing, SunCoke cannot justify spending hundreds of millions of dollars on additional controls. Without those controls, however, it might fall into noncompliance and incur severe penalties in December 2025.