in size and drop strength from blast furnace coke and is not interchangeable with blast furnace coke. There are only two remaining foundry coke producers in the U.S., one of which is SunCoke's Jewell coke plant and the other being ABC Coke. Iron foundries use coke to melt scrap metal to produce cast iron shapes that are used in a wide variety of industries, including automotive parts (in particular for electric vehicles), construction, agriculture, defense, energy, and municipal water. SunCoke produces approximately 31% (approximately 170,000 tons per year) of the entire domestic foundry coke supply. The U.S. Department of Commerce has prohibited imports of foundry coke from China since 2003, after concluding that China's foundry coke imports violated antidumping laws and were being sold for less than fair market value in the U.S.[8] For these reasons, SunCoke's production of foundry coke is critical to the U.S. economy and should not be curtailed.

SunCoke is also a significant employer; it employs a substantial union workforce and provides jobs in economically challenged areas of the country. In total, SunCoke provides 887 well-paying jobs to its employees, with 40% of its workforce being members of the United Steelworkers union. With respect to SunCoke's coke plants, Jewell (VA) plant provides 116 jobs; Granite City (IL) provides 102 jobs; Haverhill (OH) provides 173 jobs; Indiana Harbor (IN) provides 163 jobs; and Middletown (OH) provides 91 jobs. SunCoke is a stable employer, with the average length of tenure for its employees being 11 years. In addition to SunCoke's own employees, it provides numerous jobs for long-term, on-site contractors. SunCoke's coke plants provide a positive impact to the local economies far beyond SunCoke jobs. SunCoke employs a wide variety of local businesses as contractors and supports local communities through donations and participation in community-building events.

Numerous coke plants have closed over the past decade due to aging assets and the high costs necessary to maintain these facilities to meet existing environmental requirements.[9] Because EPA's proposed changes are uneconomical and impractical, additional coke plant closures or curtailments will result, leading to a decline in domestic steel and cast iron production. Regulations rendering domestic cokemaking infeasible would further cripple the domestic steel and iron foundry industries, increase the necessity to import these products, hinder the U.S. transition to a low-carbon economy, and cause job loss in economically distressed areas. The end result of the amendments as proposed would be to harm rather than protect the environment, and they should be modified.

[8] *See, e.g., Final Results of Antidumping Administrative Review: Foundry Coke from the People's Republic of China*, 69 Fed. Reg. 4,108, 4,108 (Dep't Commerce Jan. 28, 2004) ("AR 2001–2002 Final Results").

[9] Closures since 2014: DTE Shenango (300Kt); USS Granite City (500Kt); USS Gary Works (1,200Kt); Tonawanda (150Kt); Erie Works (150Kt); Bluestone (300Kt); Middletown (Wilputte) (400Kt); Mountain State Carbon (700Kt); and Clairton (Partial) (700Kt).