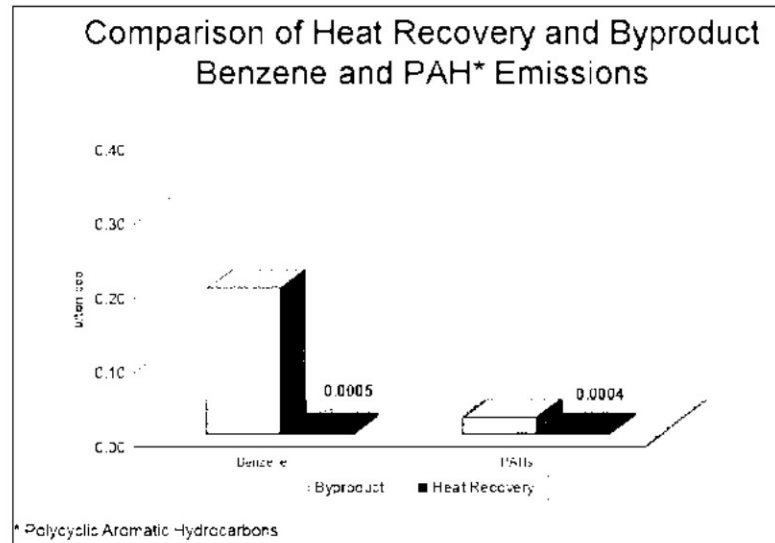


recovery and byproduct plants. EPA ignored these differences (and the Fence-line Monitoring data) when it determined, for example, that it was “necessary” to require Fence-line Monitoring for both.



2. SunCoke's Facilities Do *Not* Emit COE Directly to the Atmosphere

SunCoke does not emit coke oven emissions (“COE”) directly to the atmosphere through its bypass or waste heat stacks. EPA makes significant mischaracterizations of SunCoke’s venting process in the *Federal Register* notice and in its analysis of SunCoke’s emissions:

The one facility without HRSGs *sends COE directly to the atmosphere* via waste heat stacks, 24 hours per day, 7 days a week. At the current heat recovery facilities, each HRSG can be bypassed ranging from 192 to 1,139 hours per year, depending on the facilities’ permits, *sending COE directly into the atmosphere*.

88 Fed. Reg. 55858, 55864 (Aug. 16, 2023) (emphasis added); *see also id.* 55877. The volatiles in the coke oven emissions are already fully combusted when vented out of the waste heat and bypass vent stacks and therefore, no COE is vented directly to the atmosphere. *See* Section III.A. Instead fully combusted oven flue gases (primarily CO₂, H₂O, and excess oxygen and nitrogen) are vented to the atmosphere. This is because, as described in Section III.A above, SunCoke’s ovens operate under negative pressure such that the volatiles in the coal are combusted within the oven system, which means they are not vented to the atmosphere like ByP coke ovens.

SunCoke performs quarterly industrial hygiene monitoring for COEs at all of its facilities pursuant to OSHA’s Coke Oven Emissions Standard, 29 CFR § 1910.1029. As part of this monitoring, SunCoke monitors employees’ potential exposure to COEs by collecting personal air samples during normal operations from several categories of workers, including burners, hot car operators, door machine operators, and PCM operators, among others. This monitoring has consistently demonstrated that air samples taken from employees working in close proximity to operational coke ovens shows that the potential exposure to the relevant PAHs (phenanthrene,