

new requirements may lead to earlier detection of excess HAP emissions.⁷⁹ That is not true with respect to the addition of Method 303A monitoring.

Under Method 303A, a certified observer walks “the length of the battery on the outside of the pusher machine and quench car tracks at a steady, normal walking pace, pausing to make appropriate entries on the door area inspection sheet.”⁸⁰ In contrast, SunCoke employs multiple layers of monitoring, including the following:

- Electronic monitoring of the pressure in the common tunnel is conducted using a draft cell at the end of the common tunnel to confirm continuous operation under negative pressure;
- SunCoke employees monitor the coke ovens for door leaks throughout all stages of the coking cycle and adjust the ovens by reviewing electronic data and physically walking the coke oven batteries. Employees in the field and in the control room are in constant radio contact to implement any required fixes; and
- After charging, SunCoke checks each door for leaks, and if a door leak due to positive pressure is detected, it is immediately corrected by adjusting oven uptakes, dampers, and/or sole flues, and is then recorded, and reported as required under section 63.303(c).

SunCoke’s existing monitoring system already accurately monitors for pressure and allows personnel to take action in a timely and safe manner when necessary. Adding duplicative monitoring requirements will add to SunCoke’s monitoring burden without leading to earlier detection of excess HAP emissions. Accordingly, EPA must reconsider its decision to require redundant monitoring using Method 303A.

4. The Method 303A monitoring requirements are entirely unclear.

The requirements for performing daily oven pressure monitoring using Method 303A are also entirely unclear. Section 63.303(a)(1)(i) requires HNR facilities to determine compliance with the 0.0 percent leaking coke oven door standards “as determined by the procedures in Section 63.309(d)(1)” but 63.309(d)(1) describes how an enforcement agency would calculate a 30-run rolling average of the percent leaking coke oven doors using the observations from “each performance test.” Section 63.309(d)(1) says:

(d) Using the observations ***obtained from each performance test, the enforcement agency shall compute and record***, in accordance with the procedures and requirements of Method 303 or 303A in appendix A to this part, for each day of operations on which a valid emissions value (or set of values) is obtained:

(1) The 30-run rolling average of the percent leaking coke oven doors, topside port lids, and offtake systems on each coke oven battery, using the equations in sections 12.5, 12.6, and 12.7 of Method 303 (or section 12 of Method 303A) in appendix A to this part; . . .

⁷⁹ 89 Fed. Reg. at 55686.

⁸⁰ Method 303A at Section 11.2.