

October 2, 2023

Submitted via <https://www.regulations.gov>

U.S. Environmental Protection Agency
EPA Docket Center
Mail Code 28221T
1200 Pennsylvania Avenue NW
Washington, DC 20460

Re: Comments on Proposed Rule, National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries, Docket ID Nos. EPA-HQ-OAR-2002-0085 and EPA-HQ-OAR-2003-0051

To Whom It May Concern:

On behalf of SunCoke Energy, Inc. ("SunCoke"), Beveridge & Diamond, P.C., respectfully submits these comments to the U.S. Environmental Protection Agency ("EPA" or "the Agency") on the Agency's *Proposed Rule: National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks, and Coke Oven Batteries*, as published in 88 Fed. Reg. 55858 (Aug. 16, 2023) (the "Proposed Rule").

SunCoke believes that the Proposed Rule would impose numerous, onerous new limits and requirements that are unnecessary for environmental protection and are technically and economically infeasible, despite the Agency's findings of acceptable risk and lack of developments in practices, processes, or control technologies.¹ In fact, EPA's proposed requirements could cause irreparable harm to SunCoke. The 45-day comment period was woefully inadequate, as SunCoke explained in its request for an extension (Attachment A), which EPA denied without any explanation (Attachment B). In the limited time provided, SunCoke spent considerable effort evaluating the proposed amendments and the technical memoranda and other new information that was only recently made available to SunCoke and other affected parties; however, there was a

¹ See, e.g., 88 Fed. Reg. 55858, 55858 (Aug. 16, 2023); see also *infra* Section II (describing Agency's RTR findings and its analysis of HNR cokemaking process and emissions in prior rulemakings).

Submitted by: Heidi C. Knight, Esq., on behalf of SunCoke Energy, Inc.