the proposed amendments would increase GHG emissions by more than 46,000 tons annually and hazardous dust disposal by at least 4,360 tons per year. *Contra* 88 Fed. Reg. 55858, 55894 (Aug. 16, 2023).

SunCoke believes that the Proposed Rule is deficient in several ways. SunCoke offers comment on several elements of the Proposed Rule, and specific recommendations for improving the proposed amendments. The following identifies key elements of SunCoke's comments:

- Imposition of the amendments, as proposed, could impair the domestic steel and foundry industries, disrupt the U.S. transition to a lower carbon economy, and cause job loss in economically distressed areas (see Section I).
- The court-ordered deadline is causing EPA to scramble to interpret substantial information and publish a rule that, as proposed, will be deficient and unworkable (see Section II).
- EPA's mischaracterization of SunCoke's heat and nonrecovery cokemaking processes and its confusion of SunCoke's processes with that of byproduct coke manufacturing results in inaccuracies in EPA's development of the proposed emissions limits, proposed benzene fenceline monitoring work practices, and other portions of the Proposed Rule (see Section III).
- EPA should continue to regulate SunCoke's heat and nonrecovery cokemaking operations differently from byproduct coke manufacturing (see Section IV).
- Due to the highly technical nature of this rulemaking and the large volume of information in the docket, EPA is violating the CAA and the APA by limiting the notice and comment period to a mere 45 days (see Section V).
- EPA further violated the APA by failing to publish revised rule text in the *Federal Register*; the redline provided in the docket is not an adequate substitute, especially in light of the number of changes that are included in the redline but not explained or discussed in the *Federal Register* notice (see Section VI).
- SunCoke's facilities constitute "existing sources" under the CAA, despite EPA's failure to revise the definition of "new source" as part of this rulemaking; interpreting otherwise would result in coke oven batteries that are almost 20 years old being considered "new" (see Section VII).
- The proposed beyond-the-floor limits for SunCoke's Jewell facility are unwarranted under the applicable legal standard and based on flawed assumptions, inaccurate data, and the legally erroneous use of a cost-effectiveness threshold from an unrelated industry (see Section VIII).
- The proposed MACT limits for the HNR facilities' pushing operations are not "necessary," are based on limited and/or unreliable data, and are not "achievable," and for the facilities' main stacks and bypass/waste heat stacks, are also based on limited and/or unreliable data and are not "achievable" (see Section IX).
- The performance testing requirements for pushing emissions are not feasible, including the minimum sample volume for the Hg and PAHs test methods (see Section X).