

analyzing the data. This will push the cost of the necessary testing to nearly \$3 million.

32. SunCoke has already begun to incur nonrecoverable testing costs. SunCoke has retained AECOM—a consulting firm with expertise in source testing, environmental compliance evaluations, and environmental engineering—to complete the following work:

- a. First, AECOM has provided significant technical assistance to SunCoke, including data analysis (based on the available data) about whether each of SunCoke's plants will be able to meet the numeric emission limits in the Final Rule.
- b. Second, AECOM continues to assist SunCoke in developing a testing survey of all the HAPs, sources, and plants in SunCoke's fleet. It will likely execute the field trials to identify which of SunCoke's plants will need additional controls installed.
- c. Third, for SunCoke's plants that cannot meet the numeric emission limits in the Final Rule, or that are at significant risk of failing those limits, AECOM will also assist in