

Final Rule were in effect in 2020, IHO would have exceeded the particulate matter limit for its bypass vent stacks.

- b. Similarly, in October of 2021, a trial was conducted at the bypass vent stack of HH1 to ascertain its particulate matter emissions. Here are the measurements obtained: (1) 3.23E-02, (2) 5.97E-02, and (3) 4.94E-02. The test result was 4.72E-02 gr/dscf, which is 147% of the Final Rule's MACT floor. So if the Final Rule were in effect in 2021, IHO would have exceeded the PM limit for its bypass vent stacks.

50. *There are no controls that can be applied to correct these failures.* As discussed, a heat recovery coke oven normally operates under negative pressure (under vacuum) when in operation. The negative pressure is pulled by a set of induced draft fans, which require power to run. The operation of a heat recovery coke oven/battery under negative pressure stops volatile matter and flue gases from leaking out of the ovens and system.

51. If the system fails for any reason, including power loss, the facility's flue gas must be released in a safe manner or else the pressure build-up will find a path to exit the gas handling system, creating a