

event of a power loss. If there is no power, the controls on the vent stack would not function to prevent emissions.

54. If SunCoke were to install a full back-end control system on the vent stacks to comply with any of the new MACT vent stack limits, the new pathway (post-treatment) would be a new main stack by definition. So the vent stack limits would not apply. Instead, the new main stack limits would come into play. And SunCoke would need to create additional bypass vent stacks to ensure negative pressure can always be maintained. And then the same problems would apply to the new bypass vent stacks. Thus, for safety reasons, compliance with the new limits is impossible.

SunCoke Supplies Coke to the Steel Industry and Serves the Public Interest.

55. The United States steel industry depends on SunCoke to supply it with a significant portion of the Country's blast furnace coke and foundry coke. Blast furnace coke is used by steelmakers to produce strong, lightweight steel that is necessary for automobiles (including electric vehicles), infrastructure such as pipelines and bridges, defense equipment, and more. Foundry coke, which SunCoke produces solely at JWO, is used to produce auto parts (e.g., brakes and engine parts),