

submitted to EPA.

13. On July 5, 2024, EPA finalized the rule. 89 Fed. Reg. 55684, 55689 (July 5, 2024) (The Final Rule). The Final Rule establishes 17 new MACT floor emission limits for previously unregulated Hazardous Air Pollutants (HAPs), 1 work practice standard, and 5 HAP surrogacy standards. Thirteen of the MACT emissions standards apply to SunCoke's operations.

14. Each of the SunCoke plants is unique in some fashion, which means the MACT floor limits have different implications for each facility. For example, with the exception of HH1 and IHO, all of SunCoke's plants are equipped with either a powdered activated carbon (PAC) injection system or a hydrated PAC to control emissions of mercury.

15. In the Final Rule, EPA concluded that all the new MACT floor limits could be met with existing controls and, as a result, the Final Rule provided only 18 months for regulated facilities to achieve compliance—December 5, 2025.