

designing, engineering, and validating feasible and practicable emissions controls (where such controls exist).

33. Based on the data currently available, and despite EPA's assertions to the contrary, it is clear that SunCoke *must* install at least some controls to meet the new MACT floor limits.

34. One example that conclusively demonstrates this fact is, as discussed, SunCoke has data showing that its HH1 facility's main stack fails to meet the MACT floors for *mercury* and *particulate matter* emissions.

35. As discussed, unlike some other SunCoke plants, HH1 has no mercury controls—such as a PAC or a hydrated PAC. SunCoke does not yet know whether bringing HH1 into compliance with the new MACT floor for mercury main stack emissions is as simple as adding a hydrated PAC system at a cost of about \$4 million (\$3 million for equipment and \$1 million for additional testing), which would be the absolute minimum cost to control the mercury emissions. SunCoke might also need more expensive equipment to ensure that the newly installed hydrated PAC does not degrade HH1's ability to control other pollutants—such as sulfur dioxide. In that event, an extra spray dryer absorber, a baghouse, and a