

B. EPA Relied on Erroneous Assumptions to Compute Costs of Implementing the Proposed BTF Measures at Jewell

Under the approach adopted by EPA, only one category of facilities (HNR facilities that do not have HIRSGs)—which has only one facility (SunCoke's Jewell plant at Vansant, VA)—would be required to implement the proposed BTF measures. 88 Fed. Reg. at 55893. The Jewell plant has a unique configuration that is a product of its topography, as EPA recognized when estimating the amount of time needed for Jewell to complete the work necessary to comply with the proposed new BTF PM limit:

The facility that is affected by the new BTF PM limit is located between three rivers, a state road, and a railroad track. Therefore, due to the unique configuration of the facility, the resulting lack of space available to construct control devices and ductwork to reduce arsenic emissions from bypass stacks creates an impediment to a typical construction schedule.

88 Fed. Reg. at 55882, n.30. These same unique features are the reasons that SunCoke expects the changes that would be required under EPA's proposal to be exponentially more costly at Jewell—if they are technically or physically achievable at all. The plant's location in a river valley with rivers, a state road, railroad tracks, and extremely steep gradients on both sides does not provide sufficient space for baghouses of sufficient size to accommodate the exhaust flows from the exhaust coke oven batteries. *See* Attachment C for Jewell facility description and pictures.

