

where alternate work practices would be more appropriate, EPA cannot reject all of the comments and refuse to establish any work practice standards because commenters did not provide *specific work practices*. Had EPA asked commenters to identify specific work practices that should be applied, SunCoke would have identified the following:

Common Tunnel

- 40 C.F.R. § 63.303(a)(1) requires monitoring and recording pressure in each oven or in each common battery tunnel once per day during pushing, charging, and coking to ensure that the ovens are operated under a negative pressure.
- Possible malfunctions: Pressure cells malfunction due to instrumentation failures, negatively affecting draft and resulting in positive pressure in common tunnels.
- Potential alternative limit: Visually observe relevant section of common tunnel to confirm absence of visible emissions from tunnel.

Pushing/Charging Machines

- For charging operations, the owner or operator shall implement, for each day of operation, the work practices specified in section 63.306(b)(6).⁷⁷
- Requirement to continuously operate baghouse and maintain baghouse differential pressure within a certain range.
- Possible malfunctions: Failure of control system or electrical infrastructure components, causing baghouse to shut down; differential pressure outside of normal range.
- Possible startup concern: After PCM baghouse fabric filter cartridges are changed during routine maintenance, the fabric filter cartridges need to gather a layer of material to operate efficiently and keep the differential pressure within range.
- Potential alternative limit: Observe baghouse stack and hood PCM area for visible emissions greater than 20% over 6 minutes.

Flat Push Hot Car Machines

- 40 C.F.R. § 63.7290(f)(4) requires, for each multicyclone, maintaining the daily average pressure drop at or below the minimum level established during the initial performance test.
- Potential malfunctions: Loss of control system components or electrical service, failure of multiclone, differential pressure outside of normal range, fan amps outside of threshold values, failure of continuous monitoring system.
- Potential alternative limit: Observe hot car stack for visible emissions greater than 20% over six minutes.

⁷⁷ 40 C.F.R. § 63.303(b)(3).