

these data “better accounted for test-to-test and plant-to-plant variations.” Ex. A at 33–34.

21. Contrary to EPA’s expectations, SunCoke’s data reveal that *multiple* SunCoke facilities cannot meet the MACT floor limits.

22. Here are two examples from only *one* facility’s main stack to illustrate the point.

- a. In March of 2022, a trial was conducted at the main stack of SunCoke’s facility, HH1, to ascertain its particulate matter emissions. The relevant MACT floor is 4.90E-03 gr/dscf. Here are the measurements taken from the trial: (1) 4.10E-03, (2) 5.26E-03, and (3) 6.43E-03. The test result was 5.26E-03, which is 107% of the Final Rule’s MACT floor. So if the Final Rule were in effect in 2022, HH1 would have exceeded the PM limit for its main stack.
- b. In January of 2006, a trial was conducted at the main stack of HH1 to ascertain its mercury emissions. The Final Rule’s MACT floor is 3.00E-06 gr/dscf for main stack mercury emissions. These are the measurements obtained from the trial: (1) 5.08E-06, (2) 4.89E-06, and (3) 4.33E-06. The test