



The likelihood of significant costs and technical and physical infeasibility is especially true when considering that the oven exhaust must be cooled from 1,600°F or more to a minimum of 400°F for high temperature bag material to even function. And an air quench, as opposed to a water quench, would be required because the enormous water volumes otherwise required would far exceed the limitations of Dismal Creek, the source of plant cooling water. The air quench would result in a constant steam cloud within the valley. These two factors alone make a baghouse and an activated carbon injection (“ACI”) system technically infeasible for this site.

In the limited time SunCoke has had to comment on the Proposed Rule, it has determined that EPA’s cost calculation underestimates SunCoke’s costs in at least the following ten respects:

- EPA’s estimates did not include cooling before subjecting the 1,600° Fahrenheit exhaust from the B/W stacks to emissions controls, as would be necessary for the baghouse to function.
- The ductwork costs assume only a nominal length of unlined, galvanized steel duct between the battery stacks and the air emission controls. No provision for refractory lining, and ductwork foundations, structural support, access platforms, and underground routing of the duct were considered.
- The assumed height of the exhaust stack was too low. Given the valley location of the Jewell facility, an exhaust stack of significant height should have been considered.
- A shaker baghouse—notably the lowest capital cost baghouse type—was assumed. Shaker baghouses are old technology no longer used in industry because of high maintenance