

million (\$3 million for testing + \$59 million for mercury controls/testing + \$37 million for particulate matter controls) depending on whether more equipment is needed. These are necessary costs to control only *two* HAPs from *one* source for *one* SunCoke facility.

If Further Testing Reveals More Failures, the Projected Costs of Installing Additional Controls Are Exorbitant.

38. To determine what SunCoke needs to do to bring its facilities into compliance, I have separated the results of the limited data into five groups: (1) **clear fails**, which necessitate additional controls; (2) **marginal passes**, which likely necessitate additional controls to maintain a comfortable margin of compliance; (3) **passes, but an insufficient amount of data** to feel confident in the results of the testing; (4) **no data**; and (5) **clear passes**, requiring no further controls.

39. As discussed, based on the **clear fail** category, SunCoke must immediately spend, at minimum, \$62 million to bring its facilities into compliance with the new MACT floor emission limits. For the reasons provided above, more testing may reveal significant additional costs in this category, which could increase to \$99 million.

40. Depending on what future testing reveals, SunCoke will also need to install additional controls wherever the data show that emissions