

release oven gases to the atmosphere through bypass stacks when the heat recovery steam generators are not available due to maintenance or repair.	distillation under negative pressure to produce coke, and <u>which is designed for the combustion of the coke oven gas from which by-products are not recovered.</u> For nonrecovery plants (i.e., no chemical recovery) with heat recovery, the <u>flue oven</u> gases are sent to a heat recovery steam generator that produces steam. For nonrecovery coke oven batteries (i.e., no chemical recovery) without heat recovery, flue oven gases are treated in the common tunnel afterburner and then released to the atmosphere through waste heat stacks. Heat recovery coke oven batteries also may release <u>flue oven</u> gases <u>that have been treated in the common tunnel afterburner to the atmosphere through bypass stacks when the heat recovery steam generators are not available due to maintenance, or repair, or malfunction.</u>
The redlined versions of the Proposed Rule's changes includes the following new term and definition:	The proposed changes provide an inaccurate description of the equipment and the process. SunCoke requests revising this definition as follows:
<i>Heat recovery steam generator</i> is a process unit that recovers heat from coke oven gas in order to produce steam.	<i>Heat recovery steam generator</i> is a process unit that <u>cools the gas by recovering heat and producing steam, so that flue gas can be treated by pollution control equipment</u> recovers heat from coke oven gas in order to produce steam.
The redlined versions of the Proposed Rule's changes includes the following new term and definition:	The proposed changes provide an inaccurate description of the equipment and the process. SunCoke requests revising this definition as follows:
<i>Heat recovery steam generator bypass/waste heat stack</i> means a stack that exhausts coke oven gas into the atmosphere without passing through a HRSG. A HRSG bypass/waste heat stack exhausts coke oven gas directly from the oven batteries to the atmosphere.	<i>Heat recovery steam generator bypass/waste heat stack</i> means a stack that exhausts <u>flue gas treated by the common tunnel afterburner</u> coke oven gas into the atmosphere <u>to maintain negative pressure within the oven when the HRSGs are not available due to maintenance, repair, or malfunction</u> without passing through a HRSG. A HRSG bypass/waste heat stack exhausts coke oven gas directly from the oven batteries to the atmosphere.