- There is a general lack of confidence that there is any feasible control technology for hydrogen cyanide (HCN). Air pollution control vendors indicate that any potential solution for control of HCN is not technically feasible for coke battery combustion stack or pushing emissions.

- Any additional controls would require permitting, which takes 6-12 months after engineering is completed.

- The coke battery underfiring system is naturally drafted, with the underfire gas stream predominantly located underground. Added equipment such as heat exchangers, sorbent injection systems, etc., result in static pressure loss, necessitating installation of an induced draft fan. The impacts of added fans and equipment need to be studied to ensure adequate heating of the batteries, as well as enough physical space to install additional equipment, which may not be feasible. This poses obstacles and engineering challenges for any new add-on equipment, which could include construction of a new battery combustion stack.

- Changes to the underfiring system requires coke battery outages, during which purchased natural gas is needed to keep the battery hot. All coke production would cease; and battery refractory brick and other equipment could suffer unanticipated damage, which takes more time and expense to correct. Furthermore, for a plant like U. S. Steel's Clairton plant, outages will require staggering across batteries to prevent upset conditions at downstream processes.

- Limited available physical space within coke oven battery areas requires vertical construction, adding complexity and time to all related construction, and may be infeasible altogether.

- Adding controls on mobile pushing emission control devices involves unique engineering challenges compared to stationary sources.

- As noted above, EPA failed to appropriately address SSM events in setting the MACT limits and requirements. U. S. Steel believes a work practice requirement in lieu of hard limits is appropriate to account for SSM events.

Unfortunately, U. S. Steel's concerns as provided in comments submitted to EPA as well as those raised with the Office of Management and Budget before the Coke RTR Rule was finalized were almost entirely ignored. First, during the rule development, EPA grossly underestimated the cost impacts of the rule to the domestic steel industry Second, the compliance schedule required by EPA is woefully inadequate. In addition, EPA cherry-picked data to be used in the derivation of limits and requirements, and, most astonishingly, excluded valid data as the process fell short of EPA's statutory obligation and precedent in setting MACT floors.

Given numerous concerns regarding the feasibility in implementing the new Coke RTR Rule requirements and the fact that technology to achieve the standards in the Coke RTR Rule is unavailable, industry commenters, including U. S. Steel, requested a full three-year compliance