to accurately predict the UPL limit. EPA offered no explanation for its exclusion of relevant data—including facilities with different controls and variation driven by coal sourcing variation—in performing its calculations and setting the new MACT floor limits.

SunCoke Must Conduct Testing and Install Additional Controls to Meet the Requirements of the Final Rule.

29. As explained above, EPA ignored relevant data and employed inapt data when it set the new MACT floor limits. With the wrong inputs, EPA's analysis yielded limits that were incorrect. This places SunCoke in a difficult position.

30. As an initial matter, SunCoke's biggest difficulty is its current lack of data. Although SunCoke is sure its facilities cannot meet some of the limits, considering the lack of data available, SunCoke simply does not know whether its facilities can meet many of the new limits.

31. The cost of a full dataset for all the plants is estimated to be \$1.3 million and would take about one year. A second dataset is also necessary to adequately capture variation driven by seasonal effects and coal sourcing variation, and this will cost another \$1.3 million and require almost another year of testing. This does not include the cost of SunCoke personnel—who would be needed to assist with obtaining and