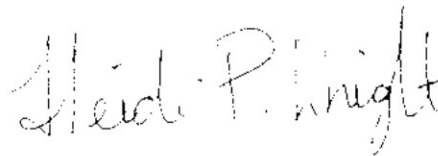


protection, are technically and economically infeasible, and could impair the domestic steel and foundry industries. Despite the Agency's findings of acceptable risk and lack of developments in practices, processes or control technologies, the Proposed Rule (and the redlined changes) include a number of requirements for SunCoke's HNR facilities that are not "necessary," based on flawed assumptions and/or inaccurate or incomplete data, and not "achievable," and in some instances, make sense for only ByP facilities, which, as EPA has long recognized, operate and emit in very different ways. EPA's rushed information gathering and rulemaking process could therefore cause irreparable harm to SunCoke.

SunCoke appreciates the opportunity to submit these comments on the Proposed Rule. SunCoke remains ready to assist EPA with additional information⁶⁰ that it may need to come to a reasonable and appropriate final rule. In the meantime, please call if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Heidi P. Knight".

Heidi P. Knight
Beveridge & Diamond, P.C.
Counsel for SunCoke Energy, Inc.

⁶⁰ SunCoke also has identified minor changes to other sections of Subparts 1. and CCCCC that it believes should be incorporated into the final rule for technical accuracy among other reasons (e.g., resulting in an environmental benefit in certain cases). SunCoke provided these comments to EPA on May 22, 2023, and is attaching them to these comments for ease of review. *See* Attachment II (SunCoke's Initial Comments for Coke Oven MACT RTR Proposed Rule).