

request that EPA keep the “coke oven battery definition” in 40 C.F.R. § 63.301 (Subpart L) and change the definition in 40 C.F.R. § 63.7352 (Subpart CCCCC) to match.

2. *Inconsistent definitions of “pushing”*

The definition of “pushing” is inconsistent in Subparts L and CCCCC. Subpart L defines “pushing” as, for the purposes of section 63.305 (alternative standards for coke oven doors equipped with sheds), “the coke oven operation that commences when the pushing ram starts into the oven to push out coke that has completed the coking cycle and ends when the quench car is clear of the coke side shed.” 40 C.F.R. § 63.301. Subpart CCCCC defines “pushing” as “the process of removing the coke from the oven. Pushing begins with the first detectable movement of the coke mass and ends when the quench car enters the quench tower.” 40 C.F.R. § 63.7352. These definitions do not accurately reflect the pushing process at SunCoke’s HNR plants.

EPA should use the definition of “pushing” below, which SunCoke provided in Attachment II to its comment letter (EPA-HQ-OAR-2002-0085-0968). This definition accurately describes the operation of the flat push hot car at SunCoke’s HNR plants and accounts for the facts that (1) the flat push hot car does not enter the quench tower; and (2) the quench car, which receives the coke from the flat push hot car, generally remains inside the quench tower.

“Pushing means the process of removing the coke from the oven. Pushing using a quench car begins with the first detectable movement of the coke mass and ends when the quench car enters the quench tower. Pushing using a flat push hot car begins with the first detectable movement of the coke mass and ends when the flat push hot car completes its travel, locks into a stationary position adjacent to the quench tower, and lines up with the quench car.”

3. *Reversed emission limits for acid gases*

The final emission limits for total acid gases under section 63.7298(c) are 0.095 gr/dscf for existing HNR coke oven batteries and 0.12 gr/dscf for new HNR coke oven batteries. Those limits should be reversed. This change will make the limits consistent with Table 7 of the Final Rule. 89 Fed. Reg. at 55709.

4. *Ambiguous definition of a “battery waste heat flues”*

The definition of “battery waste heat flues” must be clarified. Subpart CCCCC includes a new definition for “battery waste heat flues” in section 63.7352, but the definition does not make clear that it applies only to byproduct and not HNR facilities.

5. *Ambiguous work practice standard*

The Final Rule includes a new requirement in section 63.7300(c)(4) to identify and implement “good combustion practices” for “maintaining the proper and efficient combustion within battery waste heat flues.” The Final Rule does not specify that the work practice standard applies to byproduct and not HNR facilities. But it is clear from the Final Rule’s preamble, the supporting materials, and the equipment to be regulated (*i.e.*, battery waste heat flues) that the new work practice standard applies solely to ByP facilities. The preamble states that the work practice