

The redline versions of the Agency's proposed amendments to the current Subpart L and Subpart CCCCC include several new and revised terms and definitions. In the limited time SunCoke has had to comment on the Proposed Rule, SunCoke has evaluated the proposed redlines to 40 C.F.R. §§ 63.301 and 63.7352, and asks the Agency to make the below-requested changes to both sections. SunCoke has not attempted to identify every error or mischaracterization in the below table, nor has SunCoke included errors or mischaracterizations to the extent they are otherwise addressed earlier in these comments. An omission of an incorrect statement from this table is not an indication that SunCoke agrees with that error.⁵⁹

SunCoke also notes that in this rulemaking, EPA uses a number of different terms to refer to its operations, including but not limited to "HNR," "heat and/or nonrecovery coke oven battery," "nonrecovery coke oven battery," "non-recovery," "heat/nonrecovery," "heat recovery," "HNR facilities that have HRSGs," and "HNR facilities that do not have HRSGs," among other terms. SunCoke suggests referring to its facilities as (1) heat recovery facilities (e.g., Haverhill, Granite City, Middletown, and Indiana Harbor) or (2) non-recovery facilities (e.g., Jewell).

EPA's Proposed Redlined Text	SunCoke's Response
The redlined versions of the Proposed Rule's changes includes the following new term and definition: <i>Bypass stack</i> at a heat and/or nonrecovery facility means a stack that allows coke oven gas to be vented to the atmosphere and not through a heat recovery unit.	SunCoke suggests deleting this term and its definition because the term is already defined under the new proposed term "<i>heat recovery steam generator bypass/waste heat stack</i>" and because, as written, this definition for "<i>bypass stack</i>" is an inaccurate description of the equipment and the process.
The redlined versions of the Proposed Rule's changes includes the following new term and definition: <i>Heat and/or nonrecovery coke oven battery</i> means a group of ovens connected by common walls, where coal undergoes destructive distillation under negative pressure to produce coke and coke oven gas from which by-products are not recovered. For nonrecovery plants (i.e., no chemical recovery) with heat recovery, the oven 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, oven gases are released to the atmosphere through waste heat stacks. Heat recovery coke oven batteries also may	EPA appears to be trying to distinguish between heat recovery and non-recovery ovens within these definitions, however the definitions themselves do not actually provide differentiation. This proposed definition, as written, is duplicative of EPA's definition of "<i>nonrecovery coke oven battery</i>." If EPA believes a separate definition is warranted, this definition should be revised. Additionally, the proposed changes provide an inaccurate description of the equipment and the process. SunCoke requests revising this definition as follows: <i>Heat and/or nonrecovery coke oven battery</i> means a group of ovens connected by common walls and a common tunnel after burner, where coal undergoes destructive

⁵⁹ SunCoke also requests the Agency make the definition changes identified in SunCoke's Initial Comments for Coke Oven MACT RTR Proposed Rule, submitted on May 22, 2023. See Attachment H.