

The redlined versions of the Proposed Rule's changes includes the following new term and definition: <i>Heat recovery steam generator main stack</i> means the exhaust stack from a HRSG that is the point of final discharge to the atmosphere of the gases emanating from a HRSG and any auxiliary processes, if present.	The proposed changes provide an inaccurate description of the equipment and the process. SunCoke requests revising this term and the definition as follows: <i>Heat recovery steam generator m</i><i>-Main stack</i> means the exhaust stack from a HRSG that is the point of final discharge to the atmosphere of the <u>flue</u> gases emanating from a <u>heat recovery facility</u>HRSG and any auxiliary processes, if present.
The redlined versions of the Proposed Rule's changes includes the following revised definition for "<i>nonrecovery coke oven battery</i>": <i>Nonrecovery coke oven battery</i> means a group of ovens connected by common walls and operated as a unit, where coal undergoes destructive distillation under negative pressure to produce coke, and which is designed for the combustion of the coke oven gas from which by-products are not recovered. Also known as heat/nonrecovery. Nonrecovery coke oven battery refers to units from which heat is recovered from the coke oven gas exhaust as well as units where heat is not recovered.	The proposed changes provide an inaccurate description of the equipment and the process. SunCoke requests revising this definition as follows: <i>Nonrecovery coke oven battery</i> means a group of ovens connected by common walls and a <u>common tunnel after burner</u> operated as a unit, where coal undergoes destructive distillation under negative pressure to produce coke, and which is designed for the combustion of the coke oven gas from which by-products are not recovered. Also known as heat/nonrecovery. Nonrecovery coke oven battery refers to units from which heat is recovered from the combusted coke oven gas exhaust (<u>i.e., flue gas</u>) as well as units where heat is not recovered.
The redlined versions of the Proposed Rule's changes includes the following new term and definition: <i>Waste heat stack</i> at a heat and/or nonrecovery facility means a stack that allows coke oven gas to be vented directly to the atmosphere without control and where there are no units available for heat recovery.	SunCoke requests 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>waste heat stack</i>" is an inaccurate description of the equipment and process.

XVII. CONCLUSION

In closing, SunCoke would like to express that if the Proposed Rule is finalized as written, the rule would impose onerous new limits and requirements that are unnecessary for environmental