

draft bypass vent stacks can be used to vent the *fully combusted* flue gases to the atmosphere. These stacks are typically open for established limited periods during the year such that the lids are closed the majority of the time.

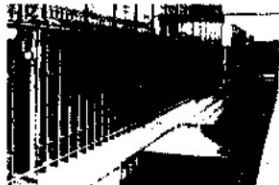
1. HNR Coke Ovens and ByP Coke Ovens are Fundamentally Different

The design and operation of SunCoke's cokemaking process is so fundamental and unique that SunCoke's facilities should not be compared to ByPs. EPA nevertheless appears to confuse SunCoke's cokemaking process with that of byproduct coke manufacturing. This leads to several inaccuracies in EPA's development of the proposed emissions limits, proposed benzene fence-line monitoring work practices, and other portions of the Proposed Rule.

For example, in the Proposed Rule, EPA makes the following mischaracterizations of the coking process at both types of coke oven facilities:

The process begins when a batch of coal is discharged from the coal bunker into a larry car (i.e., charging vehicle that moves along the top of the battery). The larry car is positioned over the empty, hot oven; the lids on the charging ports are removed; and the coal is discharged from the hoppers of the larry car into the oven. . . . This process takes place at two types of facilities: (1) by-product recovery (ByP) facilities, where chemical byproducts are recovered from coke oven emissions (COE) in a co-located coke byproduct chemical recovery plant (CBRP); or (2) heat and nonrecovery, or only nonrecovery with no heat recovery (HNR) facilities, where chemicals are not recovered but heat may be recovered from the exhaust from coke ovens in a heat recovery steam generator (HRSG).

88 Fed. Reg. 55858, 55863 (Aug. 16, 2023). These statements are false for several reasons, including: HNR cokemaking does not use a larry car; does not have a car of any kind on top of the battery; transfers coal via conveyor belts instead of cars; and has a different coking cycle timeframe than that described by EPA. The two cokemaking processes are fundamentally different and must be evaluated as such in this rulemaking.

		
	SunCoke Heat Recovery	Traditional By-Product
Pressurization	Negative pressure	Positive pressure
Air Emissions	MACT standard for new batteries	Exemption of by-product air pollutants
Power Generation	Coal-fired power	Power-generating plants
Hazardous Inputs	None	Free-sulfuric acid
Volatile Organic Compounds	Complete combustion within process	No combustion
Solid Wastes	No process hazardous wastes	Process produces hazardous waste stream (RCRA)
Wastewater	No discharge of process waste water	Process produces waste water (discharge of water CWA-NPDES)