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September 29, 2023

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U.S. Environmental Protection Agency
EPA Docket Center
Mail Code 28221T
1200 Pennsylvania Avenue NW
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Submitted via <https://www.regulations.gov/>

Re: Request for Modification of Proposed Amendments, National Emission Standards for Hazardous Air Pollutants for Coke Ovens: Pushing, Quenching, and Battery Stacks and Coke Oven Batteries, Docket ID Nos. EPA-HQ-OAR-2002-0085 and EPA-HQ-OAR-2003-0051

Dear Dr. Jones,

I write to express concerns about the economic and employment impacts of the new rule proposed by the Environmental Protection Agency (EPA), amending the National Emissions Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens¹. The EPA's proposal would

¹National Emission Standards for Hazardous Air Pollutants (NESHAP) for Coke Ovens Pushing, Quenching, and Battery Stacks (40 CFR Part 63, Subpart CCCCC) and for Coke Oven Batteries (40 CFR Part 63, Subpart L) (Docket ID Nos. EPA-HQ-OAR-2002-0085 and EPA-HQ-OAR-2003-0051) (Aug. 16, 2023).

impose new, unnecessarily burdensome requirements on coke production that would negatively impact employment, coke production and could jeopardize some steel production.

In 2021, there were more than 39,000 coal mining jobs, both underground and surface jobs combined,² in the country. While the number of coal jobs has decreased over the years because of the reduction in demand for thermal coal used in power generation, the demand for metallurgical coal, and jobs related to its mining and processing, remains high, particularly in the congressional district that I represent in Southwest Virginia.

The SunCoke Energy Jewell coke ovens at Vansant, Virginia provide nearly 120 well-paying jobs in the 409th lowest household-income congressional district in the country. It is imperative for EPA to carefully balance economic, employment, and environmental interests when issuing new rules relating to coke production. The proposed rule does not meet this test as it creates unnecessary and expensive burdens that outweigh any marginal environmental benefits.

I am told that the proposed EPA rule threatens to make domestic coke production uneconomical and impractical by drastically reducing emissions limits, adding constituents measured, and forcing the adoption of redundant instrumentation. It is my understanding that compliance with the proposed new standards, as written, is a practical impossibility.

I am hopeful that EPA will work with coke producers and modify the rule to create a more practical and less burdensome standard.

Sincerely,

A handwritten signature in black ink, appearing to read "H. Morgan Griffith". The signature is fluid and cursive, with a large, stylized initial "H" and "G".

H. Morgan Griffith
Member of Congress

² [U.S. Energy Information Administration: 2021 Annual Coal Report](#)