Jones, DonnaLee

From: David Ailor <dailor@accci.org>
Sent: Friday, March 22, 2024 7:59 PM

To: Lassiter, Penny; French, Chuck; Jones, DonnaLee

Subject: RAMBOLL MEMORANDUM ENTITLED "COAL VARIABILITY FACTORS FOR COKE OVEN

BATTERY STACKS AND PUSHING EMISSION CONTROL DEVICE STANDARDS"

Attachments: Ramboll Memo-CoalVariabilityPQBSRTR 032224.pdf

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Penny/Chuck/Donna Lee:

Attached is a March 22, 2024, memorandum prepared by Ramboll illustrating the "Hg content variability in raw material" issue that we discussed both in the COETF's comments on the proposed PQBS RTR and during our March 14 TEAMS meeting with you (see "Ramboll Memo-CoalVariabilityPQBSRTR 032224.pdf"). COETF members are gathering information on the Hg, chlorine, and fluorine content of the raw materials used by byproduct recovery coke plants in order to assist EPA in developing variability factors for its UPL calculations. We intend to share these data with EPA as soon as they are available.

Please contact me if you have any questions. DCA

David C. Ailor, P.E.
President
American Coke and Coal Chemicals Institute
25 Massachusetts Avenue, N.W.
Suite 800
Washington, D.C. 20001
Phone (Cell): 703-795-3541

eFax: 866-422-7794 dailor@accci.org www.accci.org