Maximum 30-Day Rolling Average Coke Battery Leak Rates (2018-2023)

- There has not been any development in practices, processes, or control technologies under CAA section 112(d)(6) to justify reducing leak rate limits in the current rule. Actual leak rates merely reflect overcompliance with current limits.
- Leak rate allowables in the Proposed Rule are based on annual average leak rates and do not adequately account for process, raw material, and seasonal variability. Shorter-term (e.g., 30-day) rolling averages are better at accounting for this variability.
- Leak rate allowables should be based on a robust multi-year dataset – 1 year of data produce too small a sample size. Battery leak rate data are readily available, and data from 2018-2023 were used in the coke battery emissions modeling.
- Also:
  - Leak rate allowables should continue to distinguish between tall and "not tall" batteries, with higher limits for tall batteries.
  - Leak rate allowables should not distinguish among facilities based upon coke production capacity.

	Current Limit (30-Day Rolling Avg.)	Proposed Rule (30-Day Rolling Avg.)	% Reduction	Actual 30-Day Rolling Avg. (Max.)*
Lids	0.4%	0.2%	50%	0.3%
Offtakes	2.5%	1.2%	52%	2.0%
Doors	3.3%/4.0%**	3.0%	9%/25%**	3.0%/3.6%**
Doors >3M tpy	3.3%/4.0%**	1.0%/1.5%**	70%/63%**	1.6%/2.4%**

**Burns Harbor, Warren, EES Coke, Clairton (2018-2023)*
***Tall Batteries*