Message

From: Frederick, Dave [frederickdave@firstenergycorp.com]
Sent: 3/31/2025 5:34:32 PM
To: AirAction [AirAction@epa.gov]
Subject: NESHAP - MATS Presidential Exemption Request FINAL - for filing
Attachments: NESHAP 2025 Exemption Request - MonPower.pdf

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Good afternoon,

Attached and in body is a Presidential Exemption Request for MonPower in regards to NESHAP – MATS rule. Please confirm receipt of this email.

MonPower
A FirstEnergy Company

5001 NASA Boulevard
Fairmont, WV 26554

David A. Frederick
Director, Environmental

TO: airaction@epa.gov

March 31, 2025

RE: Presidential Exemption: "National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review": Harrison Power Station and Fort Martin Power Station

Dear Sir or Madam:

Monongahela Power (Mon Power) hereby requests the Presidential Exemption under section 112(i)(4) of the Clean Air Act for the Harrison Power Station and Fort Martin Power Station to be exempted from compliance with the new requirements in the "National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review" (MATS Rule) for two years. Specifically, this request relates to the reduced filterable Particulate Matter (fPM) limit of 0.01 lb/MMBtu (0.1 lb/MWh) and the requirement to use Continuous Emissions Monitoring (CEMs) for fPM compliance.

Monitoring fPM using Continuous Emissions Monitoring System (CEMs) is a challenging application for wet-stack conditions such as those at Harrison and Fort Martin Stations. The currently available technology for wet stacks is more difficult to source, install, certify, and maintain than those at some other generating units. Work by the Electric Power Research Institute (EPRI) has demonstrated that PM CEMS will have an increased rate of failure for QA checks at the reduced fPM limit. There are also a limited number of suppliers for PM CEMS which are appropriate for wet stacks and one notable supplier recently announced that they are discontinuing their product. This constriction of supply will increase supply chain pressure on remaining technologies.

For the reduced fPM limit, the unique layout of Harrison makes upgrades more complex due to physical space constraints. These constraints, along with costs of compliance with other environmental rules may impact the ability of the station to economically and reliably produce power. Once again, the lead time to design, procure, and construct the necessary modifications may cause delays which could impact compliance especially under today's supply chain limitations. Additionally, capacity factor reductions could result from limitations in schedule or new equipment performance without the additional time offered in the extension potentially impacting commercial and industrial customers.

While Mon Power is working towards the currently established compliance dates, we are seeking this exemption as offered for the reasons stated above. Any delays in achieving compliance could require additional unit/plant down time causing electricity supply issues for the grid. Together these plants represent 3,082 MW of generation which could be impacted.

Sincerely,

David A. Frederick
Director, Environmental
FirstEnergy Service Company
on behalf of Monongahela Power Company

David Frederick
Director Environmental
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