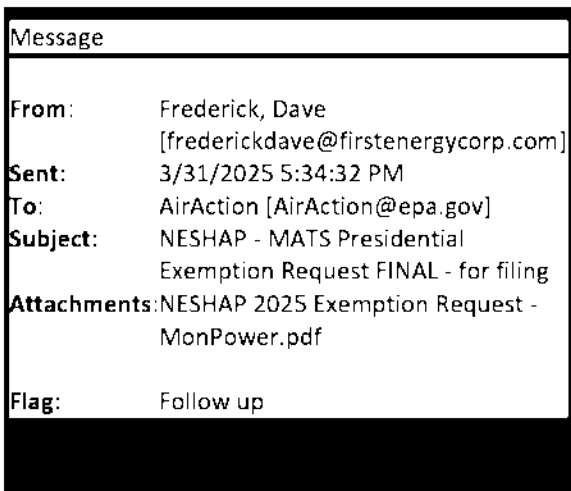




**Caution:** This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

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.

David A. Frederick  
Director, Environmental

TO: [arattrach@epa.gov](mailto:arattrach@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

office: 440-785-0759 (850-7367) | cell: 440-785-0759

frederickdave@firstenergycorp.com

341 White Pond Drive, Akron, OH 44320 | mailstop: A-WAC-C1 / Akron West Akron Campus

**The information contained in this message is intended only for the personal and confidential use of the recipient(s) named above. If the reader of this message is not the intended recipient or an agent responsible for delivering it to the intended recipient, you are hereby notified that you have received this document in error and that any review, dissemination, distribution, or copying of this message is strictly prohibited. If you have received this communication in error, please notify us immediately, and delete the original message.**

David A. Frederick  
Director, Environmental

TO: [airaction@epa.gov](mailto: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