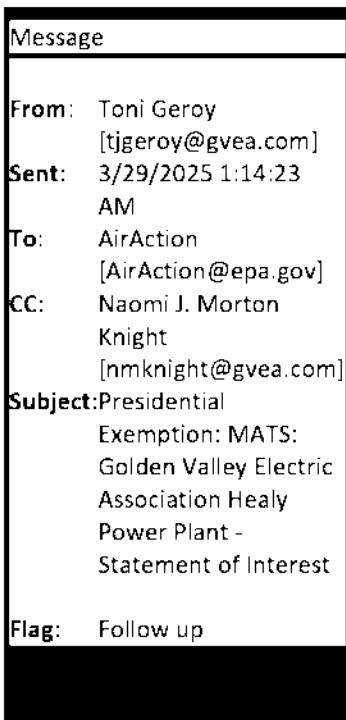




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Hello,

Please accept this notification that, by March 31, 2025, Golden Valley Electric Association intends to submit a request for a Presidential Exemption to the 2024 MATS rule amendments establishing new filterable particulate matter and mercury emissions standards.

Respectfully,  
Toni Geroy

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**GVEA** **Safety:** [www.gvea.com/safety](https://www.gvea.com/safety)

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Message

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**From:** AirAction [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA78B98923384078995E04A73D258D83-AIRACTION]  
**Sent:** 4/2/2025 12:18:43 PM  
**To:** Toni Geroy [tjgeroy@gvea.com]  
**CC:** Naomi J. Morton Knight [nmknight@gvea.com]  
**Subject:** CORRECTION: Updated email address for CBI related to the Presidential Exemption

In the previous email, an incorrect email address was provided for the submission of electronic Confidential Business Information (CBI). The email address should be:

OAQPS\_CBI@epa.gov

Thank you.

**From:** AirAction  
**Sent:** Monday, March 31, 2025 3:10 PM  
**To:** Toni Geroy <tjgeroy@gvea.com>  
**Cc:** Naomi J. Morton Knight <nmknight@gvea.com>  
**Subject:** RE: Presidential Exemption: MATS: Golden Valley Electric Association Healy Power Plant

Thank you for emailing the AirAction mailbox to request a Presidential Exemption under section 112(i)(4) of the Clean Air Act and for engaging with EPA in advancing President Trump's Executive Orders and Powering the Great American Comeback. We have received your email and will be in contact soon. If you have Confidential Business Information (CBI) that you'd like to submit, please submit it in electronic version to the [CBI@epa.gov](mailto:CBI@epa.gov) inbox or in hardcopy to:

USEPA, OAQPS  
CORE CBI Office  
4930 Old Page Road  
Durham, NC 27703

**From:** Toni Geroy <tjgeroy@gvea.com>  
**Sent:** Monday, March 31, 2025 2:53 PM  
**To:** AirAction <AirAction@epa.gov>  
**Cc:** Naomi J. Morton Knight <nmknight@gvea.com>; Toni Geroy <tjgeroy@gvea.com>  
**Subject:** Presidential Exemption: MATS: Golden Valley Electric Association Healy Power Plant  
**Importance:** High

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

To Whom it May Concern,

Golden Valley Electric Association, Inc. (GVEA) operates two existing coal-fired Electric Utility Steam Generating Units (EGUs) at the Healy Power Plant in Healy, Alaska. These two EGUs are subject to the National Emissions Standards for Hazardous Air Pollutants (NESHAP) in 40 CFR 63 Subpart UUUUU. GVEA is requesting a Presidential Exemption from the following standards for these two EGUs under Clean Air Act Section 112(i)(4). Detailed information to support this request is provided below. The body of this request and attachments referenced below are assembled formally in the attachment to this email message.

**Regulation:** National Emissions Standards for Hazardous Air Pollutants (NESHAP); Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review; 40 Code of Federal Regulations (CFR) 63 Subpart UUUU as Amended on May 7, 2024 [89 Federal Register (FR) 38508]

**Facility:** GVEA Healy Power Plant

**Emissions Units:** Healy Emissions Unit 1 (EU ID 1) and Unit 2 (EU ID 2), existing coal-fired units, low rank virgin coal

**Pollutants:**

**1) Filterable Particulate Matter (PM)** as a surrogate for non-hazardous air pollutant (non-HAP) metals emissions  
Amended Standard: 0.010 pounds per million British thermal units (lb/MMBtu)

Compliance Date: July 6, 2027

Current Standard: 0.030 lb/MMBtu

Amended Compliance Demonstration Method: PM continuous emissions monitoring system (CEMS)

Current Compliance Demonstration Method: PM continuous emissions monitoring system (CEMS) or quarterly performance (source) tests

**2) Mercury (Hg)**

Amended Standard: 1.2 pounds per trillion British thermal units (lb/TBtu)

Compliance Date: July 6, 2027

Current Standard: 4.0 lb/TBtu

**Requested Exemption Period:** 2 Years

An explanation of why the exemption is in the national security interests of the United States is provided below as Item 1. Information regarding technical infeasibility for the PM standard is provided as Item 2. Information regarding technical infeasibility for the Hg standard is provided as Item 3.

#### 1. National Security

GVEA operates and maintains over 3,000 miles of transmission and distribution lines over 5,972 square miles of service territory across Interior Alaska, serving nearly 100,000 residents, three commercial mining operations, and four military installations. One of GVEA's nine electrical generating facilities is the Healy Power Plant, which is the coal-fired power plant subject to the MATS rule. The Healy Power Plant is the only GVEA-owned electrical generating unit that produces commercial levels of electricity year-round using a fuel local to Interior Alaska (coal), which makes the Healy Plant particularly critical to GVEA's grid reliability and independence.

The GVEA system supplies electricity to all four critical military installations in Interior Alaska: US Army Garrison Fort Wainwright, Eielson Air Force Base, US Army Garrison Fort Greely, and Clear Space Force Station. These bases are vital to national security, each serving unique roles.

- Fort Wainwright is home to the U.S. Army's 11th Airborne Division, providing rapid deployment capabilities in the Arctic and Asia-Pacific region.
- Eielson Air Force Base hosts the 354th Fighter Wing, operating F-35 aircraft for air superiority missions.
- Fort Greely, under Missile Defense Command, is integral to the nation's missile defense system with its Ground-Based Midcourse Defense system designed to detect and destroy incoming ballistic missiles.
- Clear Space Force Station operates radar systems to detect incoming intercontinental ballistic missiles and submarine-launched ballistic missiles as well as space surveillance, ensuring early detection and warning of potential threats.

Reliable power supply from GVEA is essential for these installations to maintain continuous operations, directly supporting the defense infrastructure and military readiness of the United States.

Furthermore, GVEA powers pump stations along the critical Trans Alaska Pipeline System. The pipeline delivers oil produced in the Alaskan North Slope oil fields to the fuel refineries in Interior and Southcentral Alaska. Those refineries, in turn, distill the fuel oil that is distributed by truck, rail, barge and air and consumed across Alaska to fuel jets, airplanes, heaters, vehicles, and electrical generation, among countless other fuel demands.

GVEA's grid is practically isolated, having a single transmission line interconnection to electrical utilities serving Alaska's largest population center in Southcentral Alaska, including the Joint Base Elmendorf-Richardson combined U.S. Air Force and Army installation. The Southcentral Alaska electrical utilities depend primarily on natural gas produced from the Cook Inlet to power their grids. Production levels of natural gas in the Cook Inlet have been declining for years and the utilities are now grappling with a severe natural gas shortage. Whereas GVEA has historically been able to

purchase excess power from the Southcentral Alaska utilities, that supplemental resource became unavailable as of February 2024 due to the increasingly severe natural gas shortage in the Cook Inlet. As a result, GVEA's generating facilities are becoming increasingly critical to meet electrical needs not only in Interior Alaska, but also to support the utilities and essential operations in Southcentral Alaska.

GVEA's service area and membership are exceptionally vulnerable to disruptions in power generation. GVEA maintains an expansive, practically islanded electrical grid, in an extreme subarctic environment, at an isolated location on the geographical fringe of civilization. GVEA has a strong record of electrical reliability, but the mounting challenges of fuel unavailability, rising costs, and burdensome environmental regulations have undermined GVEA's resilience. A disruption to any one of GVEA's electrical generating facilities can seriously compromise GVEA's ability to meet electrical demands throughout its service territory. GVEA is a vital electrical provider to the military installations in Interior Alaska, and to their regional support networks for personnel, equipment, and supplies, and accordingly, GVEA's reliability is absolutely in the national security interest of the United States. GVEA asks that you recognize this cooperative's essential need for relief from the infeasible emissions limits and unattainable compliance timeframes in MATS by granting a two-year Presidential Exemption from the applicable MATS rule compliance date.

## 2. Technical Infeasibility for the PM Standard

The 2024 amendments to 40 CFR 63 Subpart UUUUU changed the filterable PM standard from 0.030 lb/MMBtu to 0.010 lb/MMBtu, effective on July 6, 2027. The 2024 amendments also changed the compliance demonstration method by removing the option to perform source tests and, instead, requires the use of a PM CEMS. The U.S. Environmental Protection Agency (EPA) amended the testing requirements in 40 CFR 63 Subpart UUUUU to increase the required PM sampling volume collected during each reference method test run for the PM CEMS correlation validation from 1 dry standard cubic meter (dscm) to 4 dscm. GVEA has previously submitted comments addressing the amendments. Those comments are provided in Attachments 1 and 2.

Based on GVEA's experience with PM CEMS, installing a PM CEMS on an EGU and meeting compliance with the CEMS data collection requirements in 40 CFR 63 Subpart UUUUU is not technically feasible without incurring numerous deviations from the applicable regulations. Per 40 CFR 63.10020(d):

“... Failure to collect required quality-assured data during monitoring system malfunctions, monitoring system out-of-control periods, or repairs associated with monitoring system malfunctions or monitoring system out-of-control periods is a deviation from the monitoring requirements.”

PM CEMS are typically light scattering devices. These CEMs do not directly measure filterable PM. The electrical output from the device is compared to empirical results from filterable PM source tests, and a correlation between the PM CEMS output and the source tests is developed in accordance with EPA Performance Specification 11 (PS-11). The correlation can then be used to estimate filterable PM emissions at any time using the PM CEMS. The initial correlation requires a minimum of 15 source test runs and must meet the performance criteria in PS-11. If the correlation does not meet the performance criteria, then additional runs must be performed. After the initial correlation, quarterly audits are required to ensure that the correlation remains accurate. The annual relative response audits (RRA) require a minimum of three additional source test runs, with triennial relative correlation audits (RCA) requiring twelve additional source test runs.

Per a 2012 Consent Decree, GVEA operates PM CEMS on both Healy EGUs to demonstrate compliance with a PM emission limit of 0.020 lb/MMBtu. Over the last ten years GVEA has invested considerable funds and effort to establish and maintain the performance requirements for the PM CEMS, and in doing so, GVEA has learned a great deal about the challenges and limitations of operating PM CEMS. Based on this experience, GVEA does not believe it is technically feasible to establish and maintain PM CEMS correlations in compliance with PS-11 under the new emission standard.

GVEA has been required to re-establish the correlation of a PM CEMS on several occasions over the past decade when audit results did not meet the EPA-required performance standards. GVEA has struggled for years with the Healy Power Plant's Unit 1 and Unit 2 PM CEMS to obtain and maintain valid correlations, pass relative response audits and relative correlation audits in accordance with EPA requirements, and keep the instruments operating to maintain the required monitor availability. Each correlation requires contracting, coordination, regulatory notifications, and mobilization of specialized equipment and qualified source testing personnel to the power plant location in remote Healy, Alaska for multiple days of onsite testing. The tests are expensive, disruptive and cumbersome to balance with plant operations and power generation needs.

Given GVEA's historic struggles in obtaining valid PM correlations under the existing performance specifications and applicable PM emissions limit, GVEA believes it is technically infeasible to obtain valid PM correlations under the new, lower MATS standard of 0.010 lb/MMBtu following the PS-11. The following PS-11 performance criteria are inversely dependent on the emissions limit and therefore become increasingly difficult to attain as the emission limit is lowered. As an example, the effect the new PM standard will have on these performance criteria for GVEA's current correlation equations for the Healy Unit 1 and Unit 2 PM CEMS are noted.

- 1) Confidence Interval Half Range (CI) Performance Specification – 10%
  - CI on current Unit 1 correlation equation – 4.58% (Pass)
    - CI on Unit 1 correlation under new PM standard – 9.16% (Pass)
  - CI on current Unit 2 correlation equation – 5.28% (Pass)
    - CI on Unit 2 correlation under new PM standard – 10.56% (Fail)
- 2) Tolerance Interval Half Range (TI) Performance Specification – 25%
  - TI on current Unit 1 correlation equation – 14.7% (Pass)
    - TI on Unit 1 correlation under new PM standard – 29.4% (Fail)
  - TI on current Unit 2 correlation equation – 16.7% (Pass)
    - TI on Unit 2 correlation under new PM standard – 33.4% (Fail)

This means that the valid correlations currently established for the Unit 1 and Unit 2 PM CEMS would no longer be acceptable with the lower emissions limit, and new PM CEMS correlations would have to be developed meeting the more restrictive requirements.

In public comments on the proposed MATS rule amendment, many commenters questioned the feasibility of obtaining valid PM correlations following PS-11 under the proposed lower PM emissions standard. EPA's response was to increase the volume of PM required to be collected during a test run from 1 dsem to 4 dsem. While this change may improve the poor accuracy of the empirical PM results at the lowest PM emission rates, it will also increase each test run duration from 1 hour to 3 hours. This means that a periodic PM correlation or RCA test that currently takes days will, under the new PM standard, instead take weeks. The longer duration of an already difficult test will increase the potential for test protocol upsets, personnel fatigue, and equipment failures, and will diminish GVEA's ability to dispatch its generating resources in accordance with electrical demand, maintenance and economic needs. Extending the duration of these already cumbersome periodic tests will result in an even greater cost to GVEA's member-owners and even more disruption to power plant operations. Based on GVEA's experience, it is not technically feasible to consistently complete an adequate number of valid test runs of the proposed duration to maintain compliance with the performance standard. If EPA elects to lower the PM emission standard, GVEA believes it should first develop a practical correlation method that is feasible at the lower emission limit, so regulated facilities can affordably and reasonably certify and maintain compliant PM CEMS.

Please see the following attachments for additional information and technical issues previously provided to EPA regarding 40 CFR 63 Subpart UUUU:

- Attachment 1: Comments provided by GVEA, Docket ID No. EPA-HQ-OAR-2018-0794, 88 FR 24854, June 23, 2023
- Attachment 2: Comments provided by GVEA, Docket ID No. EPA-HQ-OAR-2018-0794, April 17, 2019
- Attachment 3: Technical Comments on EPA's Proposed Rule: Mercury and Air Toxics Standards Risks and Technology Review – PM CEMS, RLR Consulting, LLC, June 16, 2023

### 3. Technical Infeasibility for the Mercury Standard

GVEA does not believe it is technically feasible to achieve the amended mercury emissions standard at Healy Unit 1 and Unit 2 by July 6, 2027.

Adapting specialized equipment to function in a coal-fired power plant in Healy, Alaska, takes more time than it would in the lower 48 states, and maintaining that equipment takes more time than one might expect as well. Healy Unit 2 has a carbon injection system for mercury control and a mercury sorbent trap monitoring system (STMS) for monitoring. The STMS system does not provide real-time emission information because the emissions levels represented by a given trap set are not known until the traps are transported from Healy, Alaska to the lab in Ohio, analyzed, and the results reported back to GVEA. The sorbent trap analysis takes about two to three weeks to complete. As a result, GVEA is not equipped to identify rising mercury emissions levels if they occur (due to natural variability in coal mercury content) and therefore

cannot actively manage the carbon injection system in response to such events to avoid an exceedance. GVEA suffered an exceedance of the mercury emissions limit on Unit 2 in 2020 due to an anomalous spike in coal mercury content, and was unaware of the exceedance until the STMS analytical results were received 17 days after the event began.

In response to the 2020 mercury exceedance event, GVEA procured a mercury process monitor for Healy Unit 2. The monitor is not approved by EPA to act as a compliance demonstration instrument, but rather serves as an on-site, real-time mercury emissions analyzer with which a facility can respond to changes in mercury levels by actively adjusting the mercury control system. GVEA has been working on installation of the mercury process monitor since 2021. The installation was initially delayed because transport, personnel, and travel were thwarted by the Covid-19 pandemic. Since 2022, the delays have been largely attributable to challenges more typical of the Healy Power Plant's remote subarctic setting. In order to accommodate the seasonal extreme temperatures that can drop below negative 40 degrees Fahrenheit, GVEA has worked extensively with the vendor to develop a custom sample line bundle that will maintain a specific gas temperature along a sample path starting at the hot sampling point in the stack, crossing an elevated outdoor catwalk, and then passing into the warm power plant to the mercury analyzer unit. The first two attempts at this custom sample line have failed, necessitating painstaking removal, packaging, and transport of the large umbilical bundle and associated parts back to the vendor for evaluation. Currently, GVEA's installation of a non-regulatory mercury process monitor has taken four years and as of March 2025 is not yet complete. Once the process monitor is consistently operational, the next steps GVEA anticipates needing to complete in order to meet the new MATS mercury emission limit will include installation, controls, and programming to tie the existing carbon injection skid to the mercury process monitor so emissions levels can be managed at the low standard.

Healy Unit 1 does not have a mercury emissions control system nor a mercury process monitor and uses annual source testing as its compliance demonstration method. In order to meet the new MATS mercury emissions limit on Healy Unit 1, GVEA expects that it will need to budget for, engineer, procure, install, and commission a mercury control system on Unit 1. Given the experience with Unit 2, GVEA further expects that it will need to install a mercury process monitor for real-time emissions data and establish the controls and programming to equip the system to respond rapidly to real-time mercury emissions levels and maintain emissions consistently below the new standard.

GVEA's experience installing and maintaining comparable equipment elsewhere makes it clear to GVEA that it is not technically feasible for GVEA to complete this work by July 6, 2027. The additional time provided by the Presidential Exemption would allow GVEA a reasonable time frame to design and install control systems suited to the unique conditions of the Healy Power Plant.

GVEA appreciates your consideration of this request. Please contact Naomi J. Morton Knight, GVEA Chief Power Supply Officer, e at [nmknight@gvea.com](mailto:nmknight@gvea.com) or (907)458-4557 with any questions.

Thank you,  
Toni Geroy

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