

Message

From: AirAction [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA78B98923384078995E04A73D258D83-AIRACTION]
Sent: 4/2/2025 3:48:58 PM
To: DALRYMPLE, KRISTIN [kdalrym@entergy.com]
Subject: RE: Presidential Exemption: Mercury and Air Toxics Standard: Entergy Arkansas, LLC – White Bluff Steam Electric Station, Unit 1

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 OAQPS_CBI@epa.gov inbox or in hardcopy to:

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

From: DALRYMPLE, KRISTIN <kdalrym@entergy.com>
Sent: Monday, March 31, 2025 7:18 PM
To: AirAction <AirAction@epa.gov>
Subject: Presidential Exemption: Mercury and Air Toxics Standard: Entergy Arkansas, LLC – White Bluff Steam Electric Station, Unit 1

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Subject: Presidential Exemption: Mercury and Air Toxics Standard: Entergy Arkansas, LLC – White Bluff Steam Electric Station, Unit 1

Entergy Arkansas, LLC (EAL), recommends that the President consider this request for an 18-month exemption for Unit 1 at the White Bluff Steam Electric Station (WBSES) from the revised emission standard for filterable particulate matter (fPM) which goes into effect on July 6, 2027. Both units at the WBSES are subject to a federally-enforceable requirement to permanently cease coal-fired operations by December 31, 2028. This requested 18-month exemption would allow White Bluff Unit 1 to continue to provide safe, reliable, and affordable power through this date.

Additional details regarding this request are outlined below, utilizing the format requested by EPA.

- Emission Standard subject to this request:
 - The standard for filterable particulate matter, applicable on or after July 6, 2027, for existing coal-fired generating units, not low-rank virgin coal, listed in Table 2 to 40 CFR Part 63 Subpart UUUUU. This standard is 1E-02 lb/MMBtu or 1E-01 lb/MWh.
 - In lieu of meeting this revised fPM emission standard, we propose that this unit instead continue to comply with current emission standard of 3E-02 lb/MMBtu or 3E-01 lb/MWh, which has been determined by EPA to be protective of public health with an adequate margin of safety.
- Facilities and effected source:
 - Facility: Entergy Arkansas, LLC – White Bluff Steam Electric Station located in Redfield, Arkansas
 - Effected Source: Unit 1
- Length of compliance period being requested:
 - An 18-month exemption is requested, from July 6, 2027 through January 5, 2029

- Technology:
 - White Bluff Unit 1 is equipped with an Electrostatic Precipitator (ESP) to control emissions of fPM, and the unit has continuously achieved compliance with the current MATS fPM limit of 3E-02 lb/MMBtu. However, examination of Continuous Emission Monitoring System data for White Bluff Unit 1 reveals a consistent pattern of higher fPM emission rates in comparison to the fPM emission rates observed for White Bluff Unit 2. fPM emissions from White Bluff Unit 1 are consistently above the revised fPM limit of 1E-02 lb/MMBtu and EAL does not anticipate that White Bluff Unit 1 will be able to consistently achieve compliance with this revised fPM limit.
 - Based on the existing requirement that White Bluff Unit 1 cease to burn coal by December 31, 2028, the relevant technology under consideration is either to replace the generating capacity of Unit 1 or to repower Unit 1 to utilize natural gas as a fuel source. EAL does not anticipate that either of these technologies can be implemented prior to July 6, 2027, thus the relevant technology to meet the capacity and generation needs of EAL and its customers is not available prior to this date.
- National Security:
 - In Executive Order 14156, Declaring a National Energy Emergency, President Trump emphasized that “[a]n affordable and reliable domestic supply of energy is a fundamental requirement for the national and economic security of any nation” and that “the United States’ insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation’s economy, national security, and foreign policy.” The ability for White Bluff Unit 1 to continue to provide safe, reliable, and affordable power through December 31, 2028, is aligned with the national security interests noted in these statements.

Should you have any questions regarding this recommendation, please let us know.

Thank you,
 Kristin Dalrymple
 Vice President, Business Operations and Strategy
 Entergy Arkansas, LLC

Kristin Dalrymple

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