

Message

From: AirAction [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=FA78B98923384078995E04A73D258D83-AIRACTION]
Sent: 4/2/2025 12:08:16 PM
To: 'Green, Brian' [Brian.Green2@nrg.com]
CC: 'Stone, Walter' [Walter.Stone@nrg.com]; craig.eckberg@nrg.com; 'Shealey, Sharene' [Sharene.Shealey@nrg.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: Tuesday, April 1, 2025 9:37 AM
To: Green, Brian <Brian.Green2@nrg.com>
Cc: Stone, Walter <Walter.Stone@nrg.com>; craig.eckberg@nrg.com; Shealey, Sharene <Sharene.Shealey@nrg.com>
Subject: RE: Presidential Exemption: 40 CFR Part 63 Subpart UUUUU (MATS Rule: NRG Facilities - W. A. Parish, Limestone, and Powerton Electric Generating Stations

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 inbox or in hardcopy to:

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

From: Green, Brian <Brian.Green2@nrg.com>
Sent: Monday, March 31, 2025 4:30 PM
To: AirAction <AirAction@epa.gov>
Cc: Stone, Walter <Walter.Stone@nrg.com>; craig.eckberg@nrg.com; Shealey, Sharene <Sharene.Shealey@nrg.com>
Subject: Presidential Exemption: 40 CFR Part 63 Subpart UUUUU (MATS Rule: NRG Facilities - W. A. Parish, Limestone, and Powerton Electric Generating Stations

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

On May 7, 2024, EPA published the Final Rule for the Review of the Residual Risk and Technology Review (RTR) for the National Emission Standards for Hazardous Air Pollutants for coal- and oil-fired electric utility steam generating units (MATS Rule). The RTR amendments included the following:

1. A 66% reduction in the filterable particulate matter (fPM) standard, which is the surrogate for non-mercury metal HAPs, from 0.030 lb/MMBtu to 0.010 lb/MMBtu for all existing coal-fired electric generating units;
2. A requirement to demonstrate continuous compliance with the new fPM with particulate matter continuous emissions monitoring (PM CEMS); and

3. Lowering the low rank (lignite) mercury (Hg) limit for existing units from 4.0 lb/TBtu to 1.2 lb/TBtu. NRG does not have units affected by the change to the Hg limit for lignite units.

NRG recommends that EPA seek a two-year presidential exemption for the MATS RTR amendments. NRG owns and operates three facilities with coal-fired units subject to MATS and the RTR amendments. W. A. Parish has four coal units with a combined output of over 2300 MWs, Limestone has two coal units with a combined output of almost 1700 MWs, and Powerton has two coal units with a combined output of approximately 1500 MWs. All three facilities comply with MATS through quarterly fPM testing, and all three had test results that qualified the units as low emitting EGUs (LEE) under the MATS Rule. Through three years of quarterly testing and one additional 36-calendar month test to demonstrate continued LEE status, each unit at the three facilities has conducted 13 fPM MATS tests. Over those 13 tests, the variability in results at all three facilities is greater than the limit EPA finalized in the RTR amendments. Powerton's variability between its lowest MATS test result and highest test result is 0.011 lb/MMBtu, W. A. Parish's variability is 0.0119 lb/MMBtu, and Limestone's variability is 0.014 lb/MMBtu. The results from these tests were all conducted at stable loads, under similar operating conditions, and according to the MATS requirements to *"operate the unit at maximum normal operating load conditions during each periodic (e.g., quarterly) performance test. Maximum normal operating load will be generally between 90 and 110 percent of design capacity but should be representative of site specific normal operations during each test run."* Importantly, there were no changes to the emissions controls over the tests described above, and there have not been technology advancements that would improve the performance of the controls at these three NRG facilities.

The variability in test results at stable load conditions demonstrates that these NRG facilities will not be able to comply with the new MATS limit of 0.010 lb/MMBtu on a continuous basis and will likely need to derate in order to comply. Derating these units will take valuable MWs off the electrical grid in critical areas. On January 20, 2025, President Trump declared that the United States needs "affordable and reliable domestic supply of energy." Putting essential generating assets in a position of weighing regulatory compliance with razor thin margins and supplying crucial MWs to both commercial and residential customers greatly risks both the affordability and reliability of the electrical grid. Units being forced to reduce loads or shutdown during periods of peak electrical demand poses threats to national security that have not been evaluated or contemplated with the MATS RTR amendments. NRG supports EPA and President Trump in granting a two-year presidential exemption to provide time for EPA to reconsider the MATS RTR Final Rule.

Additionally NRG is a member of the Class of '85 Regulatory Response Group and supports their recommendations in support of the need for the two-year Presidential Exemption.

Respectfully,



Power to be free

Brian W. Green
Sr. Environmental
Manager
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