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March 31, 2025

Mr. Lee Zeldin, Administrator
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Mail Code 1101A
airaction@epa.gov

Subject: Presidential Exemption, National Emissions 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 Cardinal Plant, Brilliant, OH

Dear Administrator Zeldin:

The 2024 MATS Rule subjects Cardinal Unit 1, Unit 2, and Unit 3 to a 0.010 lb/mmBtu filterable particulate matter limit. Cardinal is seeking a 2-year exemption because the technology to continuously achieve this standard does not exist and it is in the national security interests of the United States for Cardinal to stay online. These exemptions are important given that the MATS litigation is held in abeyance, but the rule is not stayed.

Why the technology to implement the standard is not available:

A two-year exemption would provide Cardinal necessary time to evaluate, verify and implement optimized operational strategies of its already-installed controls (ESP and JBR) and to determine if further investments are necessary and feasible to guarantee continuous compliance with the fPM limit in the 2024 MATS rule.

Under the 2012 MATS Rule, Cardinal Units qualified as Low Emitting EGUs for filterable particulate matter — Cardinal's fPM emissions have historically been so low that EPA required less-frequent stack testing. All three units would be able to demonstrate compliance with the new limit with stack testing. However, the 2024 MATS rule requires PM CEMS for compliance rather than stack testing. Units may be evaluating early retirement due to regulatory burden. Those that do commit to retirement should be able to continue demonstrating compliance with stack testing. Those units that do plan to continue operating will have to deal with the challenges associated with continuous particulate monitoring.

Units 1 and 2 both have PM CEMS installed as required by a 2007 Consent Decree. While these monitors are not certified, both units normally perform at rates below 0.010 lb/mmBtu. The continuous monitoring paired with a shorter averaging period provides little flexibility when looking at real-world operational scenarios. Even units once deemed Low Emitting EGUs will be challenged to meet the limit on a continuous basis. Particulate values at the stack may be impacted by: coal quality, load swings, FGD operations, startup/shutdown, ESP maintenance activities, SCR operations, and other operational variables. Further, coal plants,



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including Cardinal, are trying to balance control of SO₂, NO_x, mercury and particulate, minimize negative impacts to equipment, and also continue to perform as a reliable source of electric generation.

Why an extension is in the national security interests of the United States:

Cardinal Plant provides approximately 1,800 MW of baseload generating capacity critical to the stability of the grid in Ohio and the surrounding region. This capacity is particularly vital given PJM's acknowledged reliability concerns. Maintaining reliable power generation is essential for national security — critical infrastructure, communication networks, industry — all rely on an uninterrupted supply of electricity. Premature curtailment or shutdown of baseload generation capacity like Cardinal could have widespread negative impacts, especially during periods of high electricity demand in summer and winter.

The requested 2-year exemption provides time to align industry compliance strategies with reliability planning, mitigating risks to energy supply and national security interests.

If you have questions regarding this submittal, please contact Caitlin Schiebel at 614-430-7835 or cschiebel@ohioec.org.

Sincerely,

Thomas M. Alban

Thomas M. Alban
VP Generation