

March 28, 2025

To: U.S. Environmental Protection Agency

VIA E-MAIL (AIRACTION@EPA.GOV)

From: Talen Montana, LLC
NorthWestern Corporation d/b/a NorthWestern Energy

Subject: Request for Presidential Exemption from National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review, 89 Fed. Reg. 38508 (May 7, 2024): Colstrip Steam Electric Station, Units 3 and 4

Docket ID No.: EPA-HQ-OAR-2018-0794

I. EXECUTIVE SUMMARY

The emission standard subject to this Request for Presidential Exemption (Request) is 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, 89 Fed. Reg. 38508 (May 7, 2024) (2024 MATS Rule, or Rule). The 2024 MATS Rule set an emission limit of 0.010 lb/MMBtu limit for filterable particulate matter (fPM) emissions. *Id.* at 38530; *see also* 40 C.F.R. Pt. 63, Subpt. UUUUU, Tbl. 2 (“On or after July 6, 2027: 1.0E-2 lb/MMBtu”).

The affected source is the Colstrip Steam Electric Station, Units 3 and 4, located in Rosebud County, Montana (Colstrip).

Talen Montana, LLC (Talen), the operator and part owner of Colstrip, and NorthWestern Corporation d/b/a NorthWestern Energy (NorthWestern), part owner of Colstrip, jointly request that Colstrip be exempt from the 2024 MATS Rule for two years,¹ running from the later of the Rule’s compliance deadline of July 6, 2027, or July 6, 2028, if the State of Montana grants a one-year extension permissible under Section 112 of the CAA.

The President should grant this request under Section 112(i)(4) of the Clean Air Act (CAA) because (1) the technology to implement the standard is not available, and (2) the extension is in the national security interests of the United States.

Technology. The technology to implement the 2024 MATS Rule for Colstrip is “not available” from an engineering, cost, and timing standpoint.

- As applied to Colstrip, the Rule requires an untested and unproven sequencing of emission control technologies. Colstrip already employs wet venturi scrubbers, which presently achieve 99.6% control of fPM. The Biden EPA’s 2024 MATS Rule would require control

¹ This two-year exemption may be extended for more than one additional period. 42 U.S.C. § 7412(i)(4).