



A Touchstone Energy® Cooperative 

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March 28, 2025

Administrator Lee Zeldin

Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Sent via email at airaction@epa.gov

RE: Presidential Exemption: *National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review (MATS RTR)*, 89 Fed. 38508 (May 7, 2024):

Milton R. Young Station, Center, North Dakota

Dear Administrator Zeldin:

Minnkota Power Cooperative, Inc. (Minnkota) respectfully requests a Presidential Exemption under Clean Air Act from compliance with the revised standards and requirements finalized in the above-referenced MATS RTR rule. Minnkota seeks an exemption for a two-year period from the current compliance date of July 6, 2027 (as calculated, July 6, 2029) for the Milton R. Young Station (Young Station) Unit 1 and Unit 2, with the potential for a further extension should the reconsideration of the MATS RTR require EPA additional time.

I. Executive Summary.

Minnkota seeks an exemption from compliance with the MATS RTR emissions standards for the Young Station, Units 1 and 2. Minnkota seeks an exemption for a two-year period from the current compliance date of July 6, 2027. Minnkota supports its request with information regarding the following:

- The mercury technology is not available to implement the emission limitation of 1.2 lb/TBtu at the Young Station. It is entirely uncertain whether this emission limitation can be achieved. Mercury testing results presented in this exemption recommendation letter support this conclusion.
- The filterable particulate matter (fPM) control technology is not available at the Young Station to meet the new fPM limitation. The timelines for control upgrades extend beyond the current compliance dates.
- PM continuous emissions monitors (PM CEMS) are not reliable at low levels of PM, which would be required to accurately measure for compliance. The lack of reliable monitoring further compounds technology availability.

This letter is signed by Robert McLennan, a President and CEO of Minnkota and General Manager of Square Butte Electric Cooperative, and Shannon Mikula, Environmental Manager and Authorized

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