



Seward
Generation

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March 31, 2025

President Donald J. Trump
The White House
Office of the President
1600 Pennsylvania Avenue, N.W.
Washington, DC 20500

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" (89 FR 38508; May 7, 2024) (MATS Rule): Seward Generation LLC

Dear President Trump:

In accordance with the terms of your Executive Orders and to Power the Great American Comeback, Seward Generation LLC (Seward) hereby requests a Presidential exemption for the Seward Generating Station with respect to compliance with the MATS Rule for a period of two years because the technology to implement the standard is not available and it is in the national security interests of the United States to do so.

Emissions standards or limitations subject to the request

This request is for exemption from compliance with 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"

Length of compliance period being requested

Two years.

Seward notes that the two-years will cover sources beyond the original compliance date of July 2027, allowing an extension to July 2029 and that the statute allows for potential renewal.

Justification to support the request

As is shown below the Seward facility is a Low Emitting EGU (LEE) affected MATS facility. Mercury testing occurs annually, and particulate testing is conducted every three years in accordance with the Title V Operating Permit. The plant continues to meet LEE criteria and are in compliance with not only the current PM emission limit of 0.030 lbs/mmBtu and would also be in compliance with "new" compliance limit of 0.010 lbs/mmBtu.