

Oak Grove Management Company LLC

Oak Grove Steam Electric Station
6555 Sierra Drive
Irving, TX 75039

March 31, 2025

Submitted via email to airaction@epa.gov

President Donald J. Trump
c/o Administrator Lee M. Zeldin
Office of the Administrator (1101A)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

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 Fed. Reg. 38,508 (May 7, 2024); Oak Grove Steam Electric Station Units 1 and 2.

Dear President Trump:

Please accept this letter on behalf of Oak Grove Management Company LLC requesting a Presidential exemption under Section 112(i)(4) of the Clean Air Act (“CAA”) from compliance with (1) the mercury standard, and (2) the filterable particulate matter (“fPM”) surrogate emission standard for non-mercury metal hazardous air pollutants (“HAP”) and requirement to install continuous emissions monitoring systems (“CEMS” or “PM CEMS”) under the above-referenced rule (the “MATS RTR” or the “Rule”) for the Oak Grove Steam Electric Station (“Oak Grove”). Oak Grove is requesting a two-year exemption, beginning July 6, 2027, from these requirements for Oak Grove Units 1 and 2.

The MATS RTR amended 40 C.F.R. Part 63 Subpart UUUUU and became effective on July 8, 2024. Under the Rule, lignite-fired electric generating units (“EGUs”) are required to reduce mercury emissions by 70% to meet a new emissions standard of 1.2 lb/TBtu. Notably, EPA has previously agreed that there is no health-based need for this requirement. Oak Grove is also required to reduce fPM emissions from 0.030 lb/MMBtu to 0.010 lb/MMBtu. Compliance with this revised fPM limit is based on a continuous, 30-day rolling limit. In addition, the Rule requires all coal-fired EGUs to use CEMS to implement the revised fPM standard, which may not be technically feasible at the lower fPM standard. The compliance deadline for meeting the revised mercury standard, fPM standard, and for using PM CEMS is July 6, 2027, but work to design, purchase, and install the necessary emission controls and implement required adjustments to the CEMS would need to begin much sooner.

Under Section 112(i)(4) of the Clean Air Act, the President may issue exemptions “from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and