

- a. The red-line strike-out version of 40 CFR 63.9984(h) indicates that this provision is only applicable to existing EGUs. However, the proposed provisions in 40 CFR 63.9984(h)(1) and 40 CFR 63.9984(h)(2)(ii) are applicable to additional EGU categories.
 - b. The red-line strike-out version of 40 CFR 63.9984(h)(1) addresses the changes to the definition of "startup." The Federal Register notice and the red-line strike-out version of 40 CFR 63.10000(m) and Table 3 Item 3 indicate that this change is applicable to all EGUs on or after 180 days after the effective date of the final rule, not just existing units. Note that this is the only provision under 40 CFR 63.9984(h) applicable to liquid oil-fired EGUs.
 - c. The proposed revision to the Hg emissions standard presented in the red-line strike-out version of 40 CFR 63.9984(h)(2)(ii) is also applicable to new coal-fired EGUs that burn low rank virgin coal in the MATS Rule Table 1. However, the red-line strike-out version of the amended MATS Rule does not appear to capture this requirement for new coal-fired EGUs.
 - d. The provisions in the red-line strike-out version of 40 CFR 63.9984(h)(2)(iii) do not clarify which subcategories of existing EGUs must meet the filterable PM limit. This is inconsistent with the other sections and should include specific subcategories. Also note that the requirements in this provision are applicable to new coal-fired or solid oil-derived fuel-fired EGUs or IGCC EGUs. These requirements would not be applicable to new or existing liquid oil-fired EGUs.
 - e. The red-line strike-out version of 40 CFR 63.9984(h)(iv) and (v) indicates that these provisions are applicable to existing EGUs. According to the Federal Register notice and the red-line strike-out version of 40 CFR 63.10000(c)(1)(i)(C), coal-fired or solid oil-derived fuel-fired EGUs or IGCC EGUs may not pursue the LEE option for filterable PM, total non-Hg HAP metals, or individual non-Hg HAP metals for any existing, new, or reconstructed EGUs on or after 3 years after the effective date of the final MATS Rule. These requirements would not be applicable to new or existing liquid oil-fired EGUs.
3. GVEA has concerns about the proposed requirement to increase the required sampling volume collected during each reference method test run for the particulate matter continuous emissions monitoring systems (PM CEMS) from 1 dry standard cubic meters (dscm) to 4 dscm. This change would increase the costs for the facility to develop valid correlations by an estimated factor of seven, taking into consideration an increase in time from two days to nearly two weeks to complete a valid correlation.

This proposed change would increase the costs for the annual Relative Response Audit (RRA) testing (minimum of 3 test runs) from an estimated \$6,000 to \$25,000, excluding mobilization. The increase in costs for a triennial Correlation Audit (RCA) testing (minimum of 12 test runs) is estimated to be from \$10,000 to \$45,000, excluding mobilization. This increase in costs is a result of various factors: