

affected by particle size, density, and shape changes. The output of the PM CEMS must be correlated to the particulate concentration in the stack by using the currently approved test Method (Method 5) and developing correlation curves to convert the PM CEMS output to an estimated concentration. Of all of EPA's specifications for continuous emission monitors, PS-11, the performance specification for these instruments, is the only one that uses correlation methods to derive an estimated emission concentration.

The issue of varying particle size, density, and shape changes, which affect the correlation on many types of PM CEMS, could have a great impact on coal-fired power plants burning waste coal, such as is the case with this request. Coal-refuse fired power plants combust a fuel supply that has great variation in fuel chemistry as different waste coal piles are reclaimed and used for fuel. This is a far different situation than in the case of conventional virgin coal-fired power plants which use a much more consistent fuel supply. PM CEMS have not been demonstrated to be technically feasible at these extremely low emissions levels, nor is there currently any calibration method available that can accurately verify continuous measurements of fPM at levels as low as 0.01 lb/MMBtu; thus neither the technical feasibility of using these monitors, nor the ability to demonstrate compliance employing them with the lower standard on a continuous basis have been established as technical matters, to date.

Furthermore, there are no technically feasible add-on control devices that can be employed on these units, beyond those currently in use, that could provide additional controls to further reduce emissions should the new requirements for monitoring show an inability to comply with the reduced emission standard based on the new monitoring requirements.

Most importantly, based on EPA's own analysis, the reduced PM standard was not implemented for any reasons of health impact or risk^[1], but simply because EPA determined, in the Residual Risk and Technology Review, (incorrectly we believe, at least as to the sources burning coal refuse), that the lower standard was promulgated to reflect "the control levels currently achieved by the vast majority of regulated units."^[2]

As to the removal of the option to qualify as a LEE unit, the pending change to the regulation imposes a significant financial burden on the cleanest of the coal-fired units, removing an option for less frequent testing after showing that the emissions are significantly less than the current standard.

National Security Interests of the United States

As President Trump has expressed on many occasions, reliable and cost-effective energy is in the national security interest of the United States. The entire United States is facing an unprecedented surge in energy demand, driven by the rapid expansion of data centers supporting artificial intelligence, widespread electrification of vehicles and heating systems, as well as demand from the new manufacturing industries that this Administration is promoting. At the same time, the energy landscape is undergoing a major transition, with many thermal and dispatchable generation units retiring while new capacity additions are largely dominated by intermittent renewable resources such as solar and wind projects, as well as short-term storage solutions based on battery storage systems.

PJM, the ISO in which this facility operates, has expressed concerns about the increasing load and decreasing generation in its region. PJM predicts that 40 GW of its existing supply, largely, thermal based generation will retire by 2030. The PJM Long Term Growth Forecast expects loads to increase by over 55

^[1] 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 Federal Register 38508.

^[2] 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 Federal Register 38510