technical feasibility of using these monitors nor the ability to meet the lower standard on a continuous basis with these types of monitors has been established to date as a technical matter.

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 one-third or less of 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 GW by 2035. Finally, PJM's reliability study assumes a

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[1] [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