

Emissions Units: Healy Emissions Unit 1 (EU ID 1) and Unit 2 (EU ID 2), existing coal-fired units, low rank virgin coal

Pollutants:

- 1) Filterable Particulate Matter (PM) as a surrogate for non-hazardous air pollutant (non-HAP) metals emissions

Amended Standard: 0.010 pounds per million British thermal units (lb/MMBtu)

Compliance Date: July 6, 2027

Current Standard: 0.030 lb/MMBtu

Amended Compliance Demonstration Method: PM continuous emissions monitoring system (CEMS)

Current Compliance Demonstration Method: PM continuous emissions monitoring system (CEMS) or quarterly performance (source) tests

- 2) Mercury (Hg)

Amended Standard: 1.2 pounds per trillion British thermal units (lb/TBtu)

Compliance Date: July 6, 2027

Current Standard: 4.0 lb/TBtu

Requested Exemption Period: 2 Years

An explanation of why the exemption is in the national security interests of the United States is provided below as Item 1. Information regarding technical infeasibility for the PM standard is provided as Item 2. Information regarding technical infeasibility for the Hg standard is provided as Item 3.

1. National Security

GVEA operates and maintains over 3,000 miles of transmission and distribution lines over 5,972 square miles of service territory across Interior Alaska, serving nearly 100,000 residents, three commercial mining operations, and four military installations. One of GVEA's nine electrical generating facilities is the Healy Power Plant, which is the coal-fired power plant subject to the MATS rule. The Healy Power Plant is the only GVEA-owned electrical generating unit that produces commercial levels of electricity year-round using a fuel local to Interior Alaska (coal), which makes the Healy Plant particularly critical to GVEA's grid reliability and independence.