



March 31, 2025

Honorable Lee Zeldin
Office of the Administrator (1101A)
United States Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460
airaction@epa.gov

Subject: Docket ID No. EPA-HQ-OAR-2018-0794
Ameren Missouri Request for a Presidential Exemption Pursuant to CAA Section 112(i)(4) for EPA's Final Rule Amending the National Emission Standards for Hazardous Air Pollutants For Coal- And Oil-Fired Electric Utility Steam Generating Units.

Facilities: Ameren Missouri Labadie Energy Center
Ameren Missouri Sioux Energy Center

Dear Administrator Zeldin,

Ameren Missouri (Ameren) respectfully requests a two-year Presidential Exemption from compliance with EPA's final rule amending the National Emission Standards for Hazardous Air Pollutants ("NESHAP") for coal- and oil-fired electric utility steam generating units ("EGUs"), commonly referred to as the Mercury and Air Toxics Standards ("MATS") ("Final Rule"), 89 Fed. Reg. 38,508 (May 7, 2024). Ameren requests the compliance exemption extend from July 8, 2027, to July 8, 2029, in accordance with CAA Section 112(i)(4). Ameren requests the two-year exemption be granted to all units at both the Ameren Missouri Labadie Energy Center and the Ameren Missouri Sioux Energy Center. That exemption would also avoid forcing Ameren to make commitments to very costly and cost-ineffective control retrofits that will produce little benefits, as EPA reconsiders this rule to determine whether it is consistent with the statutory "necessary and appropriate" standard as interpreted by the Supreme Court in *Michigan v. EPA*, 576 U.S. 743 (2015).

To comply with the Final Rule, Ameren will be required to make additional capital investments which will likely require more time than allotted in the amendments. Achieving compliance with the requirements in the Final Rule by 2027 could jeopardize national security interests by risking the