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March 28, 2025

Mr. Lee Zeldin, Administrator
US Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, DC 20460
Mail Code 1101A
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Subject: Presidential Exemption, National Emissions Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review (89 FR 38508; May 7, 2024) (MATS Rule), for Northampton Generating Unit 1 located in Northampton, Pennsylvania.

Dear Administrator Zeldin:

Olympus Power, LLC (Olympus) is writing to request a Presidential two-year exemption from the revised MATS rule Filterable Particulate Matter (FPM) emissions standard for Northampton Generating Unit 1. In the revised MATS rule not only was the numerical limit reduced by 67% from 0.030 pounds FPM/million British thermal units (lbs. FPM/MMBtu) to 0.010 lbs. FPM/MMBtu, but the compliance methodology was also changed from:

- requiring filterable particulate matter source emissions testing using the average of three test runs, in accordance with Table 5 to Subpart UUUUU of Part 63 – Performance Testing Requirements, 1. Filterable Particulate matter (PM), Emissions Testing, to determine the emissions from the unit; to
- requiring the use of continuous filterable particulate matter continuous emissions monitoring system (FPM CEMS).

Requiring FPM CEMS as the compliance methodology also changes the compliance averaging period from testing once every three years as a Filterable Particulate Matter Low Emitting Electric Generating Unit (FPM LEE) to continuous monitoring, FPM CEMS. The abandonment of the methodologies specified in the current Title 40 Part 63, Subpart UUUUU changes the limit far more dramatically and is far more stringent than just a change in the

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