

period of demonstrating compliance with the MATS fPM emission limit based on (1) quarterly stack testing and (2) PM CEMS. For stack testing, we estimated a total cost of \$260,000 (i.e., 10 yr. x 4 quarters x \$6,500). The 10-year cost for PM CEMS was \$479,500. The PM CEMS estimate included \$90,000 capital (representative of an extractive light scatter instrument), \$35,000 for initial PS-11 correlation test, \$90,000 for three response correlation audits (RCA), \$45,500 for seven relative response audits (RRA), and about \$20,000 per year for routine maintenance and spare parts. Note that our PM CEMS estimate did not include the cost of three PM spiking events, which would significantly increase the cost of the PM CEMS option. Also, neither cost estimate assumed 3-hr test runs. Longer test runs will increase the cost of quarterly stack tests; however, we believe the cost increase would be greater for PM CEMS because so many more test runs are involved.

We also disagree with EPA statements regarding stack testing costs. EPA states, “annual cost for M5 testing with 3 hour run duration is estimated to be \$85,127 (\$82,000 for testing, and \$3,127 for 24 hours of site technical support); quarterly testing using M5I with runs of similar duration is estimated to be \$107,127.”¹⁷ RLR obtained a cost estimate of \$38,000 from a stack testing company to conduct four quarterly stack tests and collect a minimum sample volume of 4 dscm for each run. EPA digs a deeper hole with its absurd M5I annual estimate of \$107,127. As a threshold matter, M5I is not allowed under the MATS rule because M5I specifies a probe and filter temperature of 250 ° F whereas the MATS rule requires a probe and filter temperature of 320 ° F. Assuming EPA were to correct this technical oversight, EPA could never explain how M5I testing would or should cost \$22,000 more per year than M5 testing. In other words, EPA grossly inflates its stack testing cost estimates in attempting to make PM CEMS appear more palatable.

Qualitative Aerosol Generator

EPA is correct in stating that for several years the Electric Power Research Institute (EPRI) funded research associated with the development of the Qualitative Aerosol Generator (QAG). The QAG could generate particles of uniform size distribution at precisely known concentrations. The QAG contained components (i.e., mass flow meter) whose calibrations were traceable to the National Institute of Standards and Technology (NIST). However, it was never clear whether the PM aerosol concentration could be shown to be “NIST traceable.”

More importantly, EPRI ceased funding QAG research circa 2018. Among the reasons for stopping the research were (1) the field tests had become increasingly complex and expensive and (2) utility-funders lost interest primarily because of EPA’s lack of response despite several attempts by EPRI to get EPA involved in a project that sought to make PM CEMS correlations more efficient. We find it incredulous that EPA would dredge up an EPRI project that the Agency never showed any support for and attempt to use that defunct project to support this rulemaking proposal.

¹⁷ Ibid at 24873.