

Plum Point Energy Station, Osceola, AR

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March 31, 2025

[[HYPERLINK "mailto:Submittedviaemailtoairaction@epa.gov"](mailto:Submittedviaemailtoairaction@epa.gov)]

President Donald J. Trump
c/o Administrator Lee M. Zeldin
Office of the Administrator (1101A)
U.S. Environmental Protection Agency
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Re: Presidential Exemption: Clean Air Act Section 112(i)(4)
"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 FR 38508; May 7, 2024) (MATS Rule)
Plum Point Energy Station, Osceola, AR

Dear President Trump and Administrator Zeldin:

Please accept this letter on behalf of Plum Point Energy Station requesting a Presidential exemption under Section 112(i)(4) of the Clean Air Act ("CAA") from compliance with the filterable particulate matter ("fPM") surrogate emission standard for non-mercury metal hazardous air pollutants ("HAP") and the requirement to install continuous emissions monitoring systems ("CEMS" or "PM CEMS") under the above-referenced rule (the "MATS revisions" or the "Rule") for the Plum Point Energy Station in Osceola, AR ("PPES"). Plum Point is requesting a two-year exemption, beginning July 6, 2027, from these requirements for PPES.

The MATS revisions became effective on July 8, 2024. Under the Rule, coal-fired electric generating units ("EGUs") would be required to meet a revised fPM standard that is 66% lower than the previous limitation in Subpart UUUUU established in 2012. In addition, the Rule requires all coal-fired EGUs to install PM CEMS to comply with the revised fPM standard, rather than allowing EGUs to continue to use stack testing to demonstrate compliance. The compliance deadline for meeting the revised fPM standard and for installing and using PM CEMS is July 6, 2027. *See* 89 Fed. Reg. at 38,519.

Under Section 112(i)(4) of the Clean Air Act, the President may issue exemptions "from compliance with any standard or limitation under this section for a period of not more than 2 years if the President determines that the technology to implement such standard is not available and that it is in the national security interests of the United States to do so." 42 U.S.C. § 7412(i)(4). Accordingly, the President is authorized to exercise his discretion to provide an exemption from the MATS revisions where (1) the technology required for compliance is not available and (2) where it is in the national security interests of the nation to do so. In light of this authority and the significant