



Golden Valley Electric Association

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You Touch the Energy Cooperative 

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Email Submittal
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**Comments on
Proposed National Emission Standards for Hazardous Air Pollution: Coal-and Oil-
Fired Electric Utility Steam Generating Units Review of the Residual
Risk and Technology Review**

Docket ID No. EPA-HQ-OAR-2018-0794, 88 FR 24854

1. Golden Valley Electric Association, Inc. (GVEA) operates two existing coal-fired Electric Utility Steam Generating Units (EGUs) subject to the National Emission Standards for Hazardous Air Pollutants (NESHAP) in 40 Code of Federal Regulations (CFR) 63 Subpart UUUUU. GVEA has chosen to demonstrate compliance with the non-hazardous air pollutant (HAP) metals emission standard by complying with the surrogate filterable particulate matter (fPM) emissions standard in 40 CFR 63 Subpart UUUUU. GVEA has no issues with the proposal to remove the limits for non-Hg HAP metals and individual HAP metals. However, both the Federal Register and the red-line strike-out version¹ of the rule are unclear on whether these limits would be removed from the rule in their entirety or only for a subset of affected sources. Page 24886 of the Federal Register notice states, "We solicit comment on our proposal to remove the non-Hg metals emission limits from all existing MATS-affected EGUs." The same page also states, "Given that owners or operators of the other EGUs applicable to MATS have chosen to demonstrate compliance with only the fPM emission limit, we propose to remove the non-Hg metals emission limits—both individual and total—from MATS." Other sections of the Federal Register notice indicate that the emission standards for liquid oil-fired EGUs are not changed. Table 1 of the red-line strike-out version of the proposed rule indicates new units are not affected by this change. Table 2 of the red-line strike-out version of the proposed rule indicates existing oil-fired units are not affected by this change. EPA appears to base the proposed removal of these standards on the proposed requirement that "all coal-fired EGUs demonstrate compliance with the fPM emissions standard by using PM CEMS" (88 FR 24857), this proposed revision appears to appropriately apply to only new and existing coal-fired or solid oil-derived fuel-fired EGU or Integrated Gasification Combined Cycle (IGCC) EGUs.
2. The requirements in 40 CFR 63.9984(h) of the red-line strike-out version of the proposed MATS Rule are not as described in the Federal Register notice and the proposed MATS Rule Tables 1 and 2. The inconsistencies are identified in the following bullets.

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