

Under the MATS Rule, there is a requirement to install PM CEMS. EPC submits that the technology to implement such standard is not available, installing relevant upgrades that are needed to comply by the Rule's Compliance Deadline is not feasible, converting to Gas-fired Boilers is not feasible by the rule's compliance deadline, and that there are various issues with PM CEMS that demonstrate a lack of technical availability by of means of demonstrating compliance with the rule.

EPC believes that EPA significantly underestimated costs associated with a PM CEMS. Installation of a PM CEMS at a single unit, including site preparation and engineering activities, analyzer equipment and installation cost, and initial PS-11 correlation testing is estimated to range from \$180,000 to over \$400,000 (depending on vendor and brand). However, EPC estimates that the installation of PM CEMS at all three plants could exceed \$350,000-\$550,000.00 and would include analyzers, engineering stack studies/port installation, upgraded umbilical collection lines, revise DAHS programming, daily calibrations, semi-annual RATA certifications, and annual maintenance. Another factor is that the CEMS parts need to be replaced over time. Manufacturers have stopped making CEMS replacement parts, making it necessary to replace an entire PM CEMS system more often. In addition, EPA did not account in its MATS Rule for the fact that PM CEMS needed to be replaced every 10 years or the cost of the replacement (\$180,000 to over \$400,000).

EPC notes that ongoing PM CEMS correlation testing with injection of media in the effluent to artificially raise emission levels costs at least \$250,000 per test evolution at one source, and testing is required by MATS once every three years. For some EGUs, annual costs associated with PM CEMS are estimated to range from \$92,900 to over \$154,600, whereas annual costs associated with stack testing are estimated to range from \$24,000 to \$32,000.

During the comments period on the proposed MATS Rule, many commenters provided data showing that, by eliminating the LEE provisions which allow once per three-year emissions testing as an incentive to be a low emitter, EPA is forcing massive cost increases by the requirement of continuous emissions monitoring, record keeping, and reporting on the lowest emitting affected EGUs.

EPC believes that PM CEMS cannot be used to demonstrate compliance with the new MATS Rule. The fPM standards were lowered by 2/3rds. Starting in 2027, sources will be required to demonstrate compliance with a PM CEMS on the more stringent fPM standards which are 0.010 lbs/MMBtu. Demonstrating compliance with emissions standards this low utilizing a PM CEMS is not a viable option. Some units have used PM CEMS for many years and have encountered problems with operating their PM CEMS with regard to (i) meeting the Quality Assurance-Quality Control (QA-QC) criteria; and (ii) establishing the correlation curve.

PM CEMS also fail to meet the QA/QC criteria. When a PM CEMS fails to meet the QA-QC criteria, the collected data are considered out-of-control and are no longer considered valid. An owner/operator has no real time indication that its EGU might have failed the required QA-QC criteria until several weeks after the testing has been completed. This could result in hundreds of hours of monitor downtime being created retroactively after the QA-QC criteria failure has been identified and is required to be reported as a deviation under the MATS rule.