

18. And, units would need to shoot for emissions below 0.010 lb/MMBtu in order to comply. *See* Pet'rs' Brief at 72. Therefore, the fPM CEMS technology needed to demonstrate compliance with the new fPM limitation is "not available."

The costs and market limitations associated with fPM CEMS also make it "not available." Installing, certifying, and operating fPM CEMS is very costly—far more costly than quarterly stack testing and far more costly than EPA estimates in the Rule. *See* PGEN Comments at 25-26. Costs include purchasing and installation of fPM CEMS, as well as potential modifications to the units to accommodate CEMS, extended correlation testing, and annual operational costs. *See id.* at 26; *see also* Class of '85 Comments at 18 (estimating \$180,000 to \$400,000 for "site preparation and engineering analysis, analyzer equipment and installation costs, and initial PS-11 correlation testing"). Market factors also limit the availability of fPM CEMS by the compliance deadline. There are a limited number of vendors for fPM CEMS, as well as a limited number of professionals certified to install and test fPM CEMS. Currently, two-thirds of facilities subject to the MATS revisions utilize stack testing and would need to install fPM CEMS by July 2027, which would overwhelm the current supply of fPM CEMS equipment, and the availability of professionals certified to inspect and test the newly installed systems. *See* Class of '85 Comments at 16. Supply chain constraints will also extend the lead times for obtaining and certifying new systems. Consequently, meeting the MATS revision compliance dates is not practicable.

Finally, we are aware of alternative sorbent trap monitoring that could potentially be used to meet the non-mercury metal HAPs standard. However, this technology is not yet available or proven. Thus, currently, units must adopt the more complex and costly PM CEMS.

It is in the Interest of National Security to Issue an Exemption for the Rule

The requested exemptions from the MATS revisions' amended fPM limit and mandatory fPM CEMS requirement align with President Trump's stated views on the national security interests of the United States. The fPM limit and fPM CEMS requirements burden the nation's energy generation capacity and threatens grid stability and the supply of affordable, reliable energy. The stringent new limits and the high costs associated with compliance, particularly in combination with other rulemakings impacting coal-fired EGUs, could lead source owners to consider prematurely retiring coal-fired EGUs before there is sufficient new dispatchable generation to replace them, endangering grid reliability. *See* PGEN Comments at 2, 5, 7, 21. Coal-fired EGUs play a critical role in maintaining grid stability and ensuring a reliable supply of electricity to both residential and industrial consumers. A disruption in PPES' operations could lead to grid instability. We provide a consistent and dependable source of energy that is essential for meeting the electricity demands of critical infrastructure and key industrial sectors. The operation of our facility is essential for meeting peak energy demands, particularly during extreme weather conditions or other emergencies. This reliability is crucial for the overall resilience of the national energy infrastructure. Any disruption to our operations could compromise the energy security of the region.

Energy generation and grid reliability have been identified by the President as critical for national security. President Trump's Executive Order ("E.O.") 14156, *Declaring a National Energy Emergency*, the "generation capacity of the United States [is] . . . far too inadequate to meet our