KEYSTONE-CONEMAUGH PROJECTS
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Mr. Lee Zeldin
Administrator of the Environmental Protection Agency
U.S. Environmental Protection Agency, Headquarters
1200 Pennsylvania Avenue N.W.
Washington, DC 20004
[via: airaction@epa.gov]

Re: Presidential Exemption
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)
Keystone Generating Station (ORISPL 3136)

Dear Mr. Zeldin:

Keystone-Conemaugh Projects, LLC (KEY-CON) is pleased to submit the subject request to the U.S. EPA. KEY-CON is the licensee for two southwestern Pennsylvania (PA) facilities: the Keystone Generating Station located in Armstrong County, PA and the Conemaugh Generating Station located in Indiana County, PA.

Emissions standards or limitations subject to the request:

Keystone Station hereby requests a two-year Presidential Exemption from the pending 40CFR Part 63, MATS limit of 0.01 lb/MMBtu Particulate Matter (PM) as well as the requirement to install, certify and operate a PM continuous emissions monitoring system (CEMS) by July 8, 2027. These requirements are applicable to Keystone Station Unit 1 and Unit 2. The new deadline for the PM limit and PM CEMS in service is requested to be July 8, 2029 or later as the rule under review is potentially revised, and technologies are finalized. Justification to support this request is presented below.

Explanation of why the technology to implement the standard is not available

1. **Certifying a PM CEMS is challenging and costly, and may inaccurately indicate noncompliance.** It is already difficult to demonstrate compliance with the current MATS limits with PM CEMs requirements at 0.03 pound per million British Thermal Units (lb/MMBtu) due to the required method of "calibrating" the PM CEMS compliance meters. This method requires either turning off the PM emission control technology, or deliberately injecting particulate matter into the exhaust stack flue gas to attempt to create a steady and repetitive PM emissions curve. In both methods, PM emissions are well in excess of normal emissions and cause unnecessary pollution. The reinjection option can cause inaccuracies in