

that additional time is required for transition to renewable or clean energy generation).⁶⁹ This would provide units another compliance option and needed flexibility.

D. EPA Should Retain the fPM Emission Monitoring Options.

EGUs that do not qualify for the low emitting EGU program currently demonstrate compliance with the fPM standard by conducting quarterly performance testing (*i.e.*, quarterly stack testing), using a PM continuous parameter monitoring system (“CPMS”), or using a PM CEMS.⁷⁰ EPA is proposing to eliminate the quarterly stack testing and CPMS options for all coal-fired EGUs — specifically, requiring all coal-fired EGUs to use PM CEMS “[a]fter considering updated information on the costs for quarterly performance testing compared to the costs of PM CEMS and on the measurement capabilities of PM CEMS, as well as other benefits of using PM CEMS, which include increased transparency and accelerated identification of anomalous emissions.”⁷¹ According to EPA, PM CEMS data “supply real-time, quality-assured feedback that can lead to improved control device and power plant operation, which, in turn, can lead to fPM emission reductions.”⁷²

Talen Montana disagrees with EPA’s conclusions and strongly believes that sound engineering approaches using control device operating parameters, such as those found in EPA’s required compliance assurance monitoring (“CAM”) plans achieve the same ultimate objective of fPM emission reductions. It is unclear how adding another measurement system, particularly given the challenges with PM CEMS as described below, would be cost-effective. Talen Montana urges EPA to retain the option for quarterly stack testing (without any changes to testing frequency) and the CPMS option for all coal-fired EGUs.

I. General Challenges with PM CEMS

EPA should retain the quarterly stack testing and PM CPMS options — particularly if the Agency intends to finalize the proposed 0.010 lb/MMBtu fPM emission limit — to afford entities flexibility in demonstrating compliance with the more stringent limit. Currently, two-thirds of existing EGUs have chosen to demonstrate compliance via the quarterly stack testing approach, and EPA should continue to retain that option in light of the difficulties with using PM CEMS. EPA justifies the proposed requirement to use PM CEMS based on cost, but the Agency understates the costs of PM CEMS and significantly overstates stack testing costs.⁷³ The costs associated with installing, maintaining, and operating a PM CEMS far outweigh the costs of demonstrating compliance through stack testing, as discussed below.

⁶⁹ It makes sense for units retiring in this time frame to be allowed to continue operations without installation of new controls because the annualized costs for an eight-year period (*i.e.*, installation in the 2027-2028 time period and retirement by the end of 2035) would be excessive. For example, the annualized costs for the reheat FF with an eight-year life would be \$76.6M versus \$56.5M with a 15-year life.

⁷⁰ See 40 C.F.R. § 63.10011(b).

⁷¹ See 88 Fed. Reg. at 24,857.

⁷² *Id.* at 24,872.

⁷³ *Id.*