

Assurance/Quality Control (QA/QC) criteria for CEMS are extremely difficult to meet at such low levels.²³

At the time of the proposed rule, no commercially available PM CEMS would have been able to meet the tight confidence and tolerance intervals associated with the low proposed PM standard.²⁴ EPA was, thus, forced to address these issues in the final MATS RTR by adjusting the QA criterion and correlation procedures.²⁵ These changes are not enough to address the fundamental issue that PM CEMS are simply not able to reliably measure such low PM levels – the error rates of the instrument prohibit it.²⁶ Therefore, the CEMS technology to demonstrate compliance with the new PM standard is unavailable.

Coyote Station has been able to demonstrate very low PM emission rates with its current control technology. It initially demonstrated compliance via quarterly stack testing. After meeting the criteria to attain LEE status under the MATS Rule for PM, Coyote Station has demonstrated compliance on an every 3-year basis. Coyote Station cannot demonstrate compliance using PM CEMS because CEMS cannot reliably verify the low levels of PM that would comply with the new standard.²⁷

Furthermore, there are high costs associated with procuring, installing, certifying, testing, and operating PM CEMS.²⁸ Assuming that the technology would somehow be feasible to install, Otter Tail and the Co-owners have budgeted \$400,000 to install PM CEMS in 2026 at Coyote Station. Granting this exemption would avoid these costs if EPA were to reconsider the MATS RTR and provide relief from the PM CEMS requirement.

Finally, PM CEMS must be installed and tested by vendors that are certified, and there are only a limited number of vendors that are available. As two-thirds of coal-fired EGUs have not yet installed PM CEMS, the MATS RTR requirement will overwhelm the current supply of PM CEMS and the availability of vendors to perform the necessary work.²⁹ For these reasons, and because CEMS technology is unavailable at low PM levels, Coyote Station should receive a two-year exemption for compliance with the CEMS requirement in the MATS RTR.

²³ See *Comments of the Class of '85 Regulatory Response Group on the Proposal on National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review*, Docket No. EPA-HQ-OAR-2018-0794-5989, at 16 (June 28, 2024) (Class of '85 Comments).

²⁴ PM CEMS Technical Memo at 5.

²⁵ See 89 Fed. Reg. at 38528-29.

²⁶ See PG&E Comments at 23 (finding insurmountable the “uncertainties inherent the in the measurement device” and the “problems associated with relative size of the uncertainty to the limited data range of fPM concentrations and the confidence levels and tolerances”); see also Class of '85 Comments at 18.

²⁷ See Otter Tail Comments at 10.

²⁸ See PG&E Comments 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”).

²⁹ See Class of '85 Comments at 16.