

To: 'airaction@epa.gov' <airaction@epa.gov>

Subject: Presidential Exemption: Mercury and Air Toxics Standard: Entergy Louisiana, LLC – R S Nelson Plant, Unit 6

Entergy Louisiana, LLC (ELL) recommends that the President consider this request for a 2-year exemption for Unit 6 at the R S Nelson Plant from the revised emission standard for filterable particulate matter (fPM) which goes into effect on July 6, 2027. This requested 2-year exemption would allow R S Nelson Unit 6 to continue to provide safe, reliable, and affordable power to ELL's customers.

Additional details regarding this request are outlined below, utilizing the format requested by EPA.

- Emission Standard subject to this request:
 - The standard for filterable particulate matter, applicable on or after July 6, 2027, for existing coal-fired generating units, not low-rank virgin coal, listed in Table 2 to 40 CFR Part 63 Subpart UUUU. This standard is 1E-02 lb/MMBtu or 1E-01 lb/MWh.
 - In lieu of meeting this revised fPM emission standard, we propose that this unit instead continue to comply with current emission standard of 3E-02 lb/MMBtu or 3E-01 lb/MWh, which has been determined by EPA to be protective of public health with an adequate margin of safety.
- Facilities and effected source:
 - Facility: Entergy Louisiana, LLC – R S Nelson Plant located in Westlake, Louisiana
 - Effected Source: Unit 6
- Length of compliance period being requested:
 - A 2-year exemption is requested, from July 6, 2027 through July 5, 2029
- Technology:
 - R S Nelson Unit 6 is equipped with an Electrostatic Precipitator (ESP) to control emissions of fPM, and the unit has continuously achieved compliance with the current MATS fPM limit of 3E-02 lb/MMBtu. However, examination of Continuous Emission Monitoring System data for Unit 6 reveals a consistent pattern of fPM emission rates in excess of the revised fPM standard of 0.01 lb/MMBtu. ELL does not anticipate that R S Nelson Unit 6 will be able to consistently achieve compliance with this revised fPM limit.
 - Based on current resource planning, the relevant technology under consideration is either to replace the generating capacity of Unit 6 or to repower Unit 6 to utilize natural gas as a fuel source. ELL does not anticipate that either of these technologies can be implemented prior to July 6, 2027, thus the relevant technology to meet the capacity and generation needs of ELL and its customers is not available prior to this date.
- National Security:
 - In Executive Order 14156, *Declaring a National Energy Emergency*, President Trump emphasized that “[a]n affordable and reliable domestic supply of energy is a fundamental requirement for the national and economic security of any nation” and that “the United States’ insufficient energy production, transportation, refining, and generation constitutes an unusual and extraordinary threat to our Nation’s economy, national security, and foreign policy.” The ability for R S Nelson Unit 6 to continue to provide safe, reliable, and affordable power through December 31, 2028, is aligned with the national security interests noted in these statements.

Should you have any questions regarding this recommendation, please let us know.

Thank you,
Laura Beauchamp
Vice President, Business Operations and Strategy
Entergy Louisiana, LLC



Laura Beauchamp
Vice President
Business Operations and Strategy
Entergy Louisiana, LLC
lbeauch@entergy.com
O 504-840-2582
M 504-606-6983

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