

Furthermore, EPA failed to consider the accuracy limitations of the measurement techniques used as the basis of the revised standard. EPA relied upon performance test data (representing only full load operation during discreet time periods) to establish a revised limitation that would apply at all times. EPA also relied on PM CEMS data in which the PM CEMS response is correlated to actual fPM measurements. On an ongoing basis, the response of the PM CEMS was considered acceptable within a broad tolerance range (the allowable measurement error was approximately ± 0.0075 lb/mmBtu).

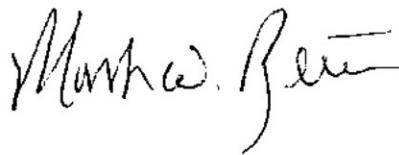
Moreover, EPA "selectively" picked data to support their desired narrative but failed to consider normal fluctuations in unit operations that are necessary to support the reliability of the nation's energy grid and did not consider normal fluctuations in control device capabilities. EPA's revised standard removed all compliance margin such that the cost of compliance was grossly under-estimated in the reconsidered rule.

The reliability of the nation's energy grid is critical to the national security interests of the United States. In establishing the revised standard, EPA failed to consider normal fluctuations in unit operations that are necessary to support the reliability of the nation's energy grid, to support future growth in demand, and to maintain fuel flexibility. Sites subject to this standard, such as D.B. Wilson Station, must commit to millions of dollars in capital investments to meet the 2027 standard, all while being faced with the regulatory uncertainty of other regulatory actions which are also being reconsidered by your Administration.

The factors noted above necessitate that companies invest significant time, money, and research to develop additional control technologies prior to July 6, 2027 knowing that emission standards in the reconsidered rule were not based on sound science, a comprehensive set of operational data, or appropriate financial considerations. We ask for the 2-year exemption to allow adequate time for your Administration to reconsider those aspects of the rule that are significantly flawed.

BREC would like to thank you in advance for the opportunity to make this request. Please contact me at mark.bertram@bigrivers.com if you have questions or need additional information.

Best Regards,



Mark W. Bertram
Director, Environmental Services
Big Rivers Electric Corporation

Our Generating Stations & Office Locations: Headquarters • Energy Transmission & Substation • Sebree Station • Wilson Station



ED_018388_00000325-00002

Sierra Club FOIA -
2025-EPA-04883

SC_EVERSPLIT0006298