

March 28, 2025

Mr. Lee Zeldin, Administrator
United States Environmental Protection Agency
1200 Pennsylvania Avenue NW
Washington, D.C. 20460

airaction@epa.gov

Subject: Presidential Exemption - D.B. Wilson Station, Ohio County, Kentucky
National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility
Steam Generating Units Review of the Residual Risk and Technology Review
(Federal Register - May 7, 2024)

Dear Mr. Zeldin,

D.B Wilson Station is a 440 megawatt coal-fired electric generating unit that is owned and operated by Big Rivers Electric Corporation (BREC). BREC is a member-owned, not-for-profit, G&T Cooperative that supplies wholesale electric power to three distribution members across 22 rural counties in western Kentucky.

BREC is respectfully requesting a two-year exemption from compliance with the 0.010 lb/mmBtu filterable Particulate Matter (fPM) emission limitation that was codified in the Federal Register on May 7, 2024 as referenced in the Subject line above. The current deadline for meeting this new standard is July 6, 2027.

A new scrubber was installed at D.B. Wilson Station in December 2022 that enhanced the control efficiency of air emissions including SO₂, fPM, and acid gases (HCl). In spite of this multi-million dollar investment by BREC, compliance with the new limit of 0.010 lb/mmBtu cannot be reliably achieved at D.B. Wilson Station. EPA's own analysis corroborated this finding as documented in Appendix A of EPA's PowerPoint presentation dated April 25, 2024, which is attached for review.

The intent of the reconsidered rule is to reduce the emissions of Hazardous Air Pollutants (HAPs). fPM is considered a surrogate to HAPs, but not an actual HAP. EPA provides no evidence that periods of increased fPM concentrations correlate to an actual increase in HAP emissions at the levels of the revised standard. In addition, the basis of the fPM / non-Hg metal surrogacy was established during performance testing at full load. EPA has failed to provide supporting documentation that HAP emissions increase during periods of control device upset that may result in higher fPM concentration.

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



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