

REINHOLD ENVIRONMENTAL[®]



2025 Reinhold/PCUG Round Table Presentation

Hosted by AEP and Buckeye Power

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Mercury and Air Toxics Standards Compliance Options

Nikia Howard

Overview

History of the MATS Rule

Supplemental Findings

2012 Final Rule

2024 Final Rule

Presidential Exemptions

2025 Proposed Rule



History of the MATS Rule

2012

Final Rule

- Compliance date
 - 2015 or 2016 w/ext
- Options: Hg CEMS, sorbent traps, PM CEMS, stack testing, HCl CEMS, SO₂ CEMS

2016

Updates

- Technical Corrections
- Final Supplemental Finding

2020

Updates

- Supplemental Finding Reconsideration
- Residual Risk & Technology Review
- Electronic Revisions

2023

Updates

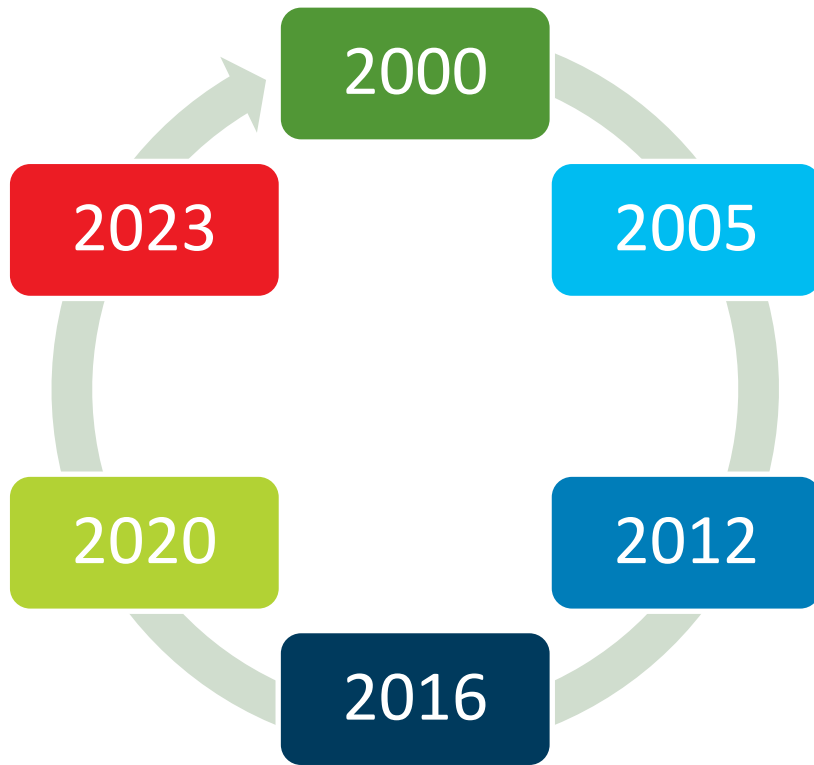
- Supplemental Finding Reconsideration

2024

Updates

- Residual Risk & Technology Review

MATS Supplemental Findings



- **2000 Determination**
 - Utility & Mercury Studies
- **2005**
 - Not appropriate or necessary
 - Regulated under 111 (CAMR)
- **2012**
 - Affirmed 2000 determination
 - Regulated under 112 (MATS)
- **2016 Finding**
 - Consideration of costs
 - Remains appropriate & necessary
- **2020 Finding**
 - Compared costs to benefits
 - Not appropriate & necessary
 - Rule remains in place
- **2023 Finding Reconsideration**
 - Revoked 2020 finding
 - Remains appropriate & necessary



2012 MATS Rule

- Subcategories



- *Coal-fired Units*

- » low-rank, HV>8300 Btu/lb, EBCR

- Oil-fired Units

- » continental/non-, limited use, solid oil

- Integrated gas combined-cycle (IGCC) units

- Regulated Pollutants

- Mercury

- Non-mercury HAP metals

- » PM surrogate, Total Hg metals, 10 individual metals

- Acid Gas HAP

- » HCl, SO₂ surrogate

- Compliance Limits

- Input-based or Output-based

- **Compliance Options**

- CEMS, CPMS, or stack testing

- Averaging

- Low Emitting EGUs

- » < 10% for Hg or < 50% for other pollutants



2012 MATS Final Rule

Pollutant	Emission Limits for Coal	Compliance Method	Compliance Period
Mercury	1.2 or 1.0 lb/TBtu	Hg CEMS STMS	30/90-day average
Total Mercury HAP Metals	5.0E-05 lb/mmBtu	Method 29	Quarterly
Individual HAP Metals (10)	Varies	Method 29	Quarterly
Filterable PM	0.030 lb/mmBtu	Method 5 PM CEMS	Quarterly 30-day avg
Acid Gases (SO ₂)	0.20 lb/mmBtu	SO ₂ CEMS	30-day average
Hydrogen Chloride (HCl)	0.0020 lb/mmBtu	Method 26A Test	Quarterly

2024 MATS Final Rule

EPA estimated 33 coal units and 22 lignite units would need to install controls to meet the revised limits

Lowered filterable PM emission limit



67 %

Requires use of PM CEMS

- Removal of quarterly stack testing option
- Removal of Continuous Parameter Monitoring Systems



2024 MATS Final Rule

Removal of Low Emitting EGUs (LEE) option



- Infrequent stack testing not necessary
- Revised limit below LEE requirement

Lowered alternative emission limits for individual Non-Hg HAP metals



- Revised for consistency with PM limit
- Request approval for HAP metal CMS

67 %

Lowered Hg limit for lignite units



- Align with existing limit for other units

70 %

2024 Compliance Options

PM CEMS

- Revised limit may be difficult to certify
- Technical revision to shift the basis of correlation testing
 - Changed to include minimum mass
- Adjusted quality assurance criterion
 - Utilize 0.015 lb/mmBtu instead of the limit

Non-Hg HAP Metal CMS

- Request and receive approval under 40 CFR 63.7(f)

Presidential Exemptions

March 12

- EPA announced plans to reconsider the final rule
 - ✓ part of 31 historic actions

March 31

- Sources encourage to apply for two-year compliance exemption

April 8

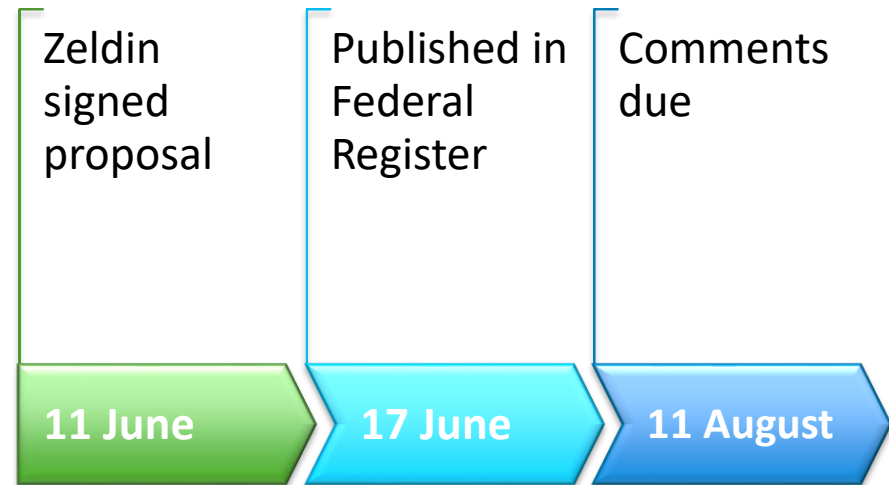
- Presidential Proclamation - *Regulatory Relief for Certain Stationary Sources to Promote American Energy*
- 47 companies (68 units)
- July 2029

June 12

- Environmental groups challenged exemptions

2025 MATS Proposed Rule

- EPA re-evaluated the 2024 final rule and determined
 - Imposes large compliance costs
 - Raises potential technical feasibility concerns
- Repeal specific amendments
 - Filterable PM standard
 - PM CEMS compliance method
 - Mercury emission standard for lignite units
- Retain filterable PM measurement requirements
 - Increased minimum volume
 - Minimum mass



*Final Rule Expected
December 2025*