

## **Advocacy Comments on EPA Continuous Emissions Monitoring for Particulate Matter on Coal- and Oil-Fired Power Plants**

On April 24, 2023, the Environmental Protection Agency (EPA) published a proposed rule titled National Emission Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units (EGU) Review of the Residual Risk and Technology Review. As part of this proposal, EPA would require Continuous Emissions Monitoring Systems (CEMS) for particulate matter (PM) for all coal- and oil-fired EGUs.

EPA should not move forward with this requirement. EPA believes that this technology is and has been more cost-effective than stack testing to demonstrate compliance. However, EGU operators by declining to choose PM CEMS for compliance have demonstrated that it is more costly than EPA estimates. The proposed lowering of emission standards will only make use of this technology even more difficult. EPA has proposed lowering PM standards based on the existing measurement requirements, and changing measurement requirements would undermine the justification for doing so. EPA should not finalize the requirement for PM Continuous Emissions Monitoring Systems and continue to allow quarterly stack testing to demonstrate compliance with PM standards.

A complete copy of Advocacy's letter to EPA [is available online](#). For more information please contact Dave Rostker, Assistant Chief Counsel, [david.rostker@sba.gov](mailto:david.rostker@sba.gov).

