



Clean Air Task Force
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Submitted via regulations.gov

U.S. Environmental Protection Agency
EPA Docket Center
Docket ID No. EPA-HQ-OAR-2013-0495
Mail Code 28221T
1200 Pennsylvania Ave., NW
Washington, DC 20460

Re: Review of Standards of Performance for Greenhouse Gas Emissions from New, Modified, and Reconstructed Stationary Sources: Electric Utility Generating Units, Proposed Rule, 83 Fed. Reg. 65,424 (Dec. 20, 2018)

Clean Air Task Force (CATF), Natural Resource Defense Council (NRDC), Conservation Law Foundation (CLF), Clean Wisconsin and Minnesota Center for Environmental Advocacy (MCEA) submit the enclosed comments on the U.S. Environmental Protection Agency's (EPA's) above-captioned Proposal to revoke the current 1,400 lbs. CO₂/MWh standard for new coal-fired power plants and replace it with standards of 1,900 – 2,200 lbs. CO₂/MWh. The Proposal is based on the Agency's determination that "the most efficient demonstrated steam cycle," not partial carbon capture and sequestration, is the best system of emission reduction for new coal-fired power plants. We vigorously oppose this Proposal, which has no basis in the record and fails to fulfill the Clean Air Act's statutory mandate, as explained in detail in the enclosed comments.

Founded in 1996, CATF seeks to help safeguard against the worst impacts of climate change by working to catalyze the rapid global development and deployment of low carbon energy and other climate-protecting technologies, through research and analysis and public advocacy leadership.

NRDC is a national nonprofit environmental organization representing more than three million members and online activists. NRDC uses law, science, and the support of its members to ensure a safe and healthy environment for all

living things. One of NRDC's top priorities is to reduce emissions of the air pollutants that are causing climate change.

CLF protects New England's environment for the benefit of all people. We use the law, science and the market to create solutions that preserve our natural resources, build healthy communities, and sustain a vibrant economy.

Since 1970, Clean Wisconsin has been the voice for the environment, working for clean air, clean water and clean energy and to protect the places we all love. To achieve this, we work on a wide range of issues and in a number of venues to protect our natural resources and the health of all Wisconsinites, now and for generations to come.

MCEA's mission is to use law, science and research to protect Minnesota's environment, natural resources and the health of its people.

Our organizations also join the comments submitted to this docket today by "Joint Environmental and Public Health Commenters" pertaining to EPA's basis for regulating carbon pollution from electric generating units under section 111 of the Clean Air Act; and concerning climate science and climate change. CATF, et al. submit separate comments today on the treatment of biomass in this rulemaking.

Respectfully submitted,

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