



Memorandum

TO: Air Quality Subcommittee
Coal Policy Task Force

FROM: Tawny Bridgeford, General Counsel & Senior Vice President,
Regulatory Affairs

DATE: August 12, 2025

SUBJECT: NMA Files Comments Supporting MATS Repeal

The National Mining Association (NMA) yesterday filed [comments](#) responding to the U.S. Environmental Protection Agency's (EPA) [proposal](#) to repeal the 2024 amendments to the National Emission Standards for Hazardous Air Pollutants for coal- and oil-fired electric utility steam generating units (EGUs) (commonly known as the Mercury and Air Toxics Standards, or simply MATS) under Section 112 of the Clean Air Act. For additional information on this proposal, please review NMA's [memorandum](#) distributed on June 20, 2025.

Our comments support EPA's decision to repeal the 2024 MATS revisions and to restore the formerly applicable standards in light of both its determination that MATS already provides an ample margin of safety and its failure to identify new developments that warrant revising the standard. Specifically, we defend EPA's decision because: (1) the costs associated with the new filterable particulate matter standards are not reasonable; (2) the new mercury standards for lignite facilities are not achievable; (3) the new requirement for particulate matter continuous emission monitoring systems is not justified; and (4) the MATS revisions were unnecessary due to the lack of residual risk. We also argue that EPA should reinstate the "low-emitting EGU" policy.

If you have any questions regarding NMA's comments or this matter, please contact me at tbridgeford@nma.org.

101 Constitution Ave. NW / Suite 500 East / Washington, DC 20001 / Phone: 202.463.2600