



Memorandum

TO: Air Quality Subcommittee
Coal Policy Task Force

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

DATE: August 8, 2025

SUBJECT: Final NMA Comments on EPA's Carbon Pollution Standards
Repeal

The National Mining Association (NMA) yesterday filed [comments](#) responding to the U.S. Environmental Protection Agency's (EPA) [proposal](#) to repeal greenhouse gas (GHG) emissions standards for the power sector under Section 111 of the Clean Air Act (now called the Carbon Pollution Standards). For additional information on this rule, please review NMA's [memorandum](#) distributed on June 20, 2025.

The NMA's comments support EPA's decision to rescind the unachievable and unlawful 2024 rule that imposed 90 percent carbon capture and sequestration (CCS) and natural gas "co-firing" based standards on coal-powered electric generating units (EGUs). The NMA also supports EPA's decision to address its failure to properly conduct an appropriate significant contribution analysis under Clean Air Act section 111(b)(1)(A). The NMA asks EPA to finalize its repeal of the 2024 emissions standards first, its significant contribution finding determination second, and separately propose and finalize a repeal of the 2015 rule that imposed 40 percent CCS on new coal-powered EGUs.

If your company or organization filed comments on EPA's proposed repeal, we would appreciate seeing your submissions. If you have any questions regarding this matter, please contact me at tbridgeford@nma.org.

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