

available during the comment period to further refine the feasibility and costs, and EPA rejected Talen Montana's request for more time to undertake additional efforts.⁵⁶

B&M's estimates for the two units combined are summarized below (see Attachment C for the memorandum from B&M which contains a detailed summary of estimates). The first table is how B&M estimates costs, including cost escalation during construction. The second table is meant to be more aligned with how EPA estimates costs, which leads to underestimates:

⁵⁶ See Talen Montana's Request for Extension of the Comment Period on the National Emissions Standards for Hazardous Air Pollutants: Coal- and Oil-Fired Electric Utility Steam Generating Units Review of the Residual Risk and Technology Review, Doc. ID: EPA-HQ-OAR-2018-0794-5880, submitted May 25, 2023 (denied on June 12, 2023).