15. Colstrip would need to undertake a massive and complex construction project to install, test, and implement these new controls the costs of which are estimated to exceed $350 million.

16. If the only feasible compliance option for the Final Rule is found to be retirement, then the investment in fPM controls for just over four years (late 2027 to the end of 2032) would be even less justifiable than otherwise. Indeed, a return period of four years on a greater than $350 million investment in fPM controls would be extremely difficult to justify, thus likely requiring Colstrip to shut down by the MATS Rule's compliance deadline of July 2027.

CCS is Not Achievable at Colstrip

17. CCS is impracticable and infeasible at Colstrip. The Final Rule allows affected EGUs to remain in operation beyond 2038 only if they can achieve 90% capture of carbon using CCS by 2032. However, this is not possible at Colstrip for the following reasons.

18. The technology to reliably achieve 90% capture of CO_2 using CCS is not adequately demonstrated or readily available. As described above, CCS is an emerging technology that remains unreliable, as well as prohibitively expensive. And there is not enough time to undertake all of the evaluations and studies, design, engineering, and construction of a CCS system at Colstrip. Talen would not invest hundreds of millions of dollars in a technology that is at best uncertain to work and that, in fact, Talen believes will not work as EPA claims it would by the Rule's deadline.