

50. Minnkota's harm is immediate. Minnkota would need to begin constructing an ESP upgrade as soon as possible to have any opportunity to meet the new compliance date for the MATS RTR.

51. For MRY 2, an ESP upgrade may achieve the New fPM Limitation with adequate margin. However, the MATS 2023 Study finds that vendors would have to complete a more detailed qualitative study and baseline testing to determine whether an ESP rebuild can achieve a low enough fPM rate based on ESP inlet and outlet emissions. **Attachment E**, at Section 2.1.6. Otherwise, a baghouse would be required. MRY would need 48 months to convert to baghouse technology. *Id.* at Table 2-2.

52. ESP upgrades take 36 months to complete. There are 26 units in the country that would need ESP upgrades for a new limitation of 0.010 lb/mmBtu. *Id.* Only 4 vendors in the United States can undertake these projects. It is likely that the 36-month estimate will be further protracted due to the dearth of contractors available to perform the work.

53. Costs of compliance with the New fPM Limitation are overly burdensome, for the following reasons.