

cost EPA attributes for Colstrip to comply with 0.015 lb/MMBtu, 0.010 lb/MMBtu, and 0.006 lb/MMBtu fPM limits:

Table 1: Annual Costs by Potential fPM Standard

<i>Annualized Costs</i>	<i>Potential fPM Standard</i>		
	0.015 lb/MMBtu	0.010 lb/MMBtu	0.006 lb/MMBtu
Total of All Facilities⁴¹	\$13-9-\$19.3M	\$77.3-\$93.2M	\$633M
Colstrip⁴²	Unit 3: \$843,600 Unit 4: \$843,600 Total: \$1,687,200	Unit 3: \$18,992,866 Unit 4: \$19,058,306 Total: \$38,051,172	Unit 3: \$18,992,866 Unit 4: \$19,058,306 Total: \$38,051,172

As reflected by EPA's own numbers, the annualized cost for Colstrip to comply with the proposed 0.010 lb/MMBtu fPM limit is approximately \$38M, which represents 41-49% of the total annualized cost of the Proposed Rule. ***This means that EPA is asking the owners of one facility — representing 0.7% of EGUs subject to the Proposed Rule — to bear nearly 50% of the costs associated with the proposed amendment.***⁴³ This result is grossly unreasonable, unwarranted, and inconsistent with EPA's rationale for the Proposed Rule and should not be finalized.

c) EPA's cost effectiveness analysis is flawed.

Additionally, EPA's proposal to tighten the fPM standard is arbitrary and capricious because the Agency's cost-benefit analysis is flawed. First, EPA overestimated the benefits attributed to Colstrip if Colstrip were to comply with the 0.010 lb/MMBtu fPM limit. Below is a table summarizing the total fPM emission reductions calculated by EPA and the fPM emission reduction from Colstrip (as calculated by EPA) if Colstrip were to comply with a 0.015 lb/MMBtu, 0.010 lb/MMBtu, and 0.006 lb/MMBtu fPM limits.

⁴¹ Table 7, Technical Memo at PDF p. 12.

⁴² Appendix D, *id.* at PDF p. 80 (total annualized costs for Colstrip is calculated by summing the annualized costs for Units 3 and 4).

⁴³ See *id.* at PDF p. 2 (evaluating fPM rates from a total of 275 individual EGUs with Colstrip representing two of those EGUs).