

activities, such as the time needed to obtain internal project approval, financing or permitting, if required, are not included. It should be noted that these time frames are separate from the regulatory time frames for EPA to take final action on the Proposed MATS RTR.

Lead times of equipment that would be used in these types of retrofits have been observed to be double or triple the lead times typically provided by suppliers before the COVID pandemic, with longer durations observed for electrical and instrumentation and control equipment. With continued supply-chain issues, it is anticipated that longer and longer lead times may be required that are difficult to quantify at this time. Therefore, timelines represented are estimated based on past project durations and not reflective of post-pandemic market delays nor the limited number of experienced OEMs capable of providing the equipment.

Table 2-2 — PM Control Implementation Schedule

PM Control Option	Design/ Specification/ Procurement (months)	Detail Design/ Fabrication (months)	Construction/ Commissioning/ Startup (months)	Minimum Total (months)
ESP Rebuild	8	16	12	36
Baghouse	10	20	18	48