

prices. The capital and operational costs to Minnkota, its member cooperatives, and end users cannot be recouped.

44. At a minimum, compliance with the new standard for mercury is estimated to cost \$22,217 per pound of incremental emission removed for Unit 2. The significant cost of reducing mercury emissions is overly burdensome for Minnkota as a small entity and as a not-for-profit electric cooperative.

45. Minnkota's harm due to the New Mercury Limitation is immediate. Minnkota must immediately begin mercury testing to determine maximum mercury removal rates and capabilities.

46. The MATS RTR sets a mercury limitation for lignite units without any technical basis or data demonstrating its achievability. In summary, the New Mercury Limitation is defective due to the following flawed assumptions:

- a. EPA assumes that greater than 90% mercury control can be achieved at lignite-fired units at a < 2.0 lb/MACF injection rate for units with installed fabric filter and using brominated PAC