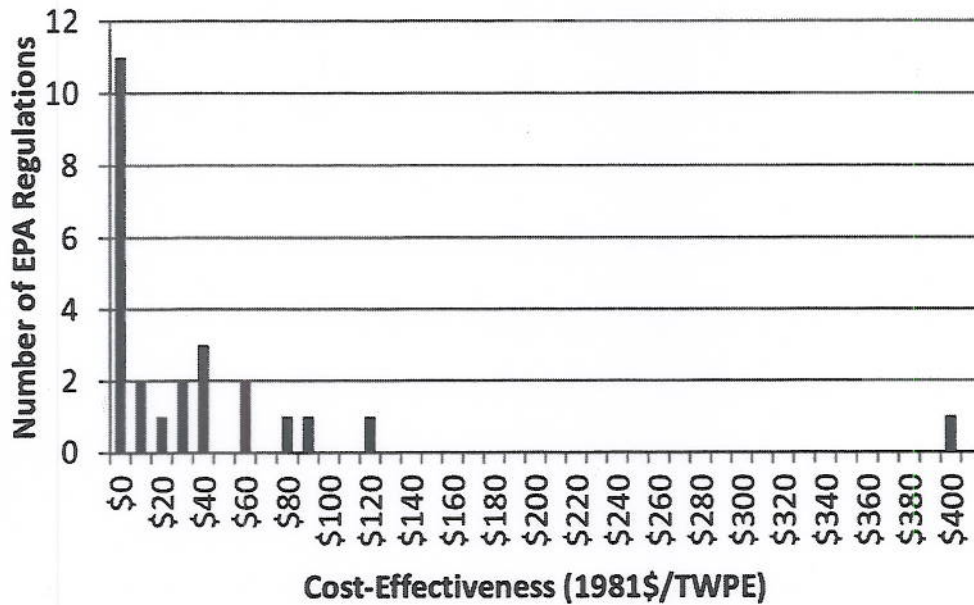


Figure E-1. Histogram of Cost-Effectiveness Values for Previous EPA BAT Regulations



Note: Analysis excludes regulations with "BAT = BPT".

Source: NERA analysis of EPA Regulatory Impact Analysis (EPA 2013b), Table D-5 (pp. D-7 to D-8).

See Attachment 14 of UWAG's 2013 Comments, p. E-3.

- Based on EPA Option 4, the total cost per TWPE for the Steam Electric Industry is \$4,215.<sup>1</sup> This is more than 10 times EPA's highest ever cost per TWPE and more than 35 times the next highest cost per TWPE.
- Prohibiting fly ash sluicing and applying physical/chemical treatment on all plants results in a cost per TWPE of \$910, which is more than 2 times the highest ever cost per TWPE.

<sup>1</sup> Costs are based on UWAG's cost effectiveness analysis. See Attachment 14 to the UWAG 2013 Comments. The costs included in this total are as follows: physical/chemical (\$311 per TWPE); incremental biological (\$1,346 per TWPE); no discharge of fly ash (\$599 per TWPE); no discharge of bottom ash (\$1,959 per TWPE).