



A Status Report: OTC Transport Team



September 12, 2013 – OTC Meeting
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Topics



- The EPA Transport Process
- A potential collaboration between upwind and downwind states to solve the ozone transport problem
- Individual state legal efforts to compel action on ozone transport

The EPA Transport Process

Regional meetings on April 7 and 18

- One in the East ... one in the West

Multiple conference calls

- Some with Commissioners and Air Directors
- Others that are more technical
 - Air Directors and technical staff

EPA has been very clear

- They will not propose a solution
- They will take a formal action to establish the “Good Neighbor” responsibilities for all upwind states
 - Could be an emission reduction requirement
 - Could be a requirement for the upwind state to adopt control programs to achieve a concentration reduction (ppb or ug/m³) in a specific downwind area
- Whatever EPA ends up doing ...
 - The bottom line is that the states will need to find the solution
 - EPA schedule has not yet been announced



The State Role in the EPA Process

Provide Comments to EPA on critical issues

- Technical Issues
- Some complicated issues resulting from the Homer City decision

Begin to look at what the “solution” or “remedy” might be

- Discussions on a technical collaboration between the states has already started



Getting a Collaborative Effort Started

... finding the solution

Really picked up steam since early April

- EPA meetings clearly generated interest

Still some confusion over what the EPA process will be and who is responsible for doing what ...

- The EPA process will only establish emission reduction responsibilities for upwind states
- States are to identify the solution - which sources to control ... and then do it
 - Technical Collaboration between many states has already begun
 - OTC, Midwest and Southern states
 - Focusing on a 2018 “business-as-usual” scenario
 - Any discussions on new policies will involve Commissioners



A Collaborative Effort Between States

... getting the effort started



There have already been very good, discussions between the states to begin a comprehensive “technical” collaboration

Appears to be several major themes

- It's more than power plants
- Mobile source NOx reduction are critical – Analyze potential Tier 3 benefits
- Power plants are important but there are some interesting trends
- ICI Boilers are also experiencing positive change in emissions



The OTC Transport Team

At its November 10, 2011 meeting the OTC charged the Air Directors to develop a technical and legal strategy to better address regional transport

- Some areas of the southern OTR continue to measure “incoming” ozone levels that are already above the new 75 ppb standard.

A Transport Team is now in place to coordinate this effort

- Looking at both technical analyses and legal options
- A group of individual states (not OTC) have been working on - and in some cases moving forward with – legal challenges to compel action on reducing ozone transport



Potential Transport Actions

- o Pushing and supporting federal measures to reduce transport
- o Section 107 recommendations for very large nonattainment areas
- o Challenging upwind states “Transport SIPs” (the Section 110A2D “Good Neighbor” SIP)
- o Section 176A Petition to expand the Ozone Transport Region
 - o May 30 letter to 9 upwind states
- o Section 126 Petitions against stationary sources
- o Another “state partnership” effort

