

Ozone Transport Commission Stationary and Area Source Committee Update

OTC Fall Meeting 2009

November 5th

Baltimore, MD

Committee Update

- Stationary Area Source Committee
 - NOx and VOC Measures
 - Stakeholder comments

Stationary and Area Source

NOx Measure	State Rules	Emissions Reduction	Cost
Boilers serving EGUs	DE, NJ, MA, MD	413 TPD OTR	\$1,100 - 8,700 per ton
New Small Gas Boilers	CA, TX	53 TPD OTR	\$3,300 to \$16,000 per ton
Municipal waste incinerators	NJ, MD	14 TPD OTR	\$2,140 per ton (SNCR)
HEDD EGUs	NJ	TBD	\$45,000 to \$300,000 per unit
Stationary Generator Regulation (DG)	DE, MA, MD, NJ	TBD	\$39,700 to \$79,700 per ton
Minor New Source Review	DE, CT, MD, MA, NJ, RI, PA, VA, VT	TBD	\$600 to \$18,000 per ton
Energy security / Energy efficiency	TBD	TBD	TBD

Stationary and Area Source

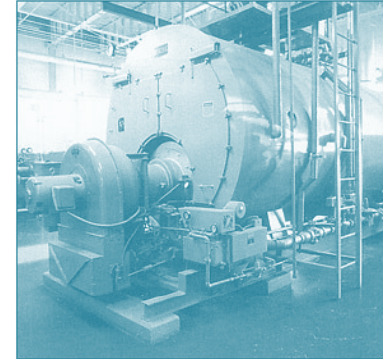
VOC Measure	State Rules	Emissions Reduction	Cost
AIM rule	CA	50 TPD OTR	\$2,240 per ton
Auto Refinishing	CA	21 TPD OTR	\$2,860 per ton
Consumer Products 2006	CA	19 TPD OTR	\$7,700 per ton
Lower VOC Solvent Degreaser	MD, CA	13 TPD OTR	\$1,400 per ton
Gas Stations	TBD	TBD	TBD
Large VOC Storage Tanks	MD, NJ	TBD	\$2,288 to \$29,000 per ton
Minor New Source Review	DE, CT, MD, MA, NJ, RI, PA, VA, VT	TBD	TBD

Measure Development Process

- February 2009, OTC Committee Meeting
 - Presented timeline for SIP development
 - Requested ideas for control options
- June 2009, OTC Annual Meeting
 - Presented White Papers
 - Provided information for evaluating control measures
- September 2009, OTC Committee Meeting
 - Presented Guidelines at September Committee meeting
 - Described recommended provisions
- November 2009, OTC Fall Meeting
 - Review of comments received
 - Request for additional stakeholder contacts.

Summary of stakeholder comments

- Boiler Serving EGUs
 - Not as cost effective as trading
 - Forces low sulfur coal usage
 - Screening Modeling not specific enough



- Comments from:

Electric Power Generation Association (EPGA), RRI Energy, Midwest Ozone Group (MOG), International Brotherhood of Electrical Workers (IBEW), United Mine Workers of America (UMWA) and Pennsylvania Coal Association (PCA), Utility Air Regulatory Group (UARG)

Summary of stakeholder comments

- Municipal Waste Incinerators

- Wait for EPA MACT
- Facility specific limits
- Establish 24-hour and annual limits
- Exceptions for start up, shutdown and malfunction



- Comments from:

Harford County Gov. MD (HCGov), Wheelabrator Technologies (WT), Covanta Energy (CE), Northeast Maryland Waste Disposal Authority (NMWDA), Bristol RRF operating committee (BRRFOC), and Conn RR authority (CRRRA).

Summary of stakeholder comments

- HEDD
 - A distributed generation strategy would be more effective



- Comments from:

Electric Power Generation Association (EPGA), RRI Energy, Midwest Ozone Group (MOG), International Brotherhood of Electrical Workers (IBEW), United Mine Workers of America (UMWA) and Pennsylvania Coal Association (PCA), Utility Air Regulatory Group (UARG)

Summary of stakeholder comments

- Stationary Generators
 - Consistent definition of “emergency”
 - Cooling, heating and powering incentives
 - NSPS approach for new engines
 - Defense training exemption
- Comments from:
 - EnerNOC, US Navy,
 - Blue Sky Environmental LLC,
 - Engine Manufacturers Association



Summary of stakeholder comments

- New small natural gas-fired ICI boilers, steam generators, process heaters, and water heaters
 - Requesting economic impact study on small businesses
 - Suggests focusing on pollution transported into Connecticut
- **Comments from:**
Connecticut Business and Industry Associations (CIBA)



Summary of stakeholder comments

- AIM Coatings
 - Wait for California Air Districts
 - Exclude tech forcing limits
 - Specific category revisions
 - Develop full model rule with strikeout
- Comments from:
 - National Paint and Coating Association (NPCA),
 - Federation of Societies for Coating Technology (FSCT)



Summary of stakeholder comments

- Consumer Products
 - Supports currently enforceable limit in CA
 - Not to include windshield washer fluid or oven cleaner (non-aerosol)
 - Not to include tech forcing limits
 - Encourages further air quality modeling
- Comments from:
Consumer Specialty Products Association (CSPA)



Summary of stakeholder comments

- Solvent Degreaser
 - Reduces cleaning efficiency
 - Prefer current 1 mm HG limit
 - Exempt solvents have toxics issues
 - Exempt, medical equip, military equip, and facilities with capture devices
- Comments from:
 - Petrferm Inc. Cleaning Group,
 - United Technologies, Accellent,
 - Sikorsky Aircraft Corporation



Summary of stakeholder comments

- Large Above Ground Storage VOC Tanks
 - East coast services available to meet demand.
- Comments from:
GEM Mobile treatment services



Summary of stakeholder comments

- No comments from stakeholders
 - Minor new source review (NSR) control requirements
 - Measure under development
 - Stage 1 & 2 compatibility
 - Not a specific strategy outlined
 - Energy Efficiency
 - SIP issue

Measure Development Process

- Next Steps
 - Source sector discussions on comments received
 - Sector specific calls with stakeholders
 - Finalize screening modeling inputs and which measures to include
 - Hold a stakeholder meeting in Spring 2010
 - Evaluate oil and gas EGU performance standards