

# OTC Attainment in the Context of CAIR



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Ozone Transport Commission  
Washington, D.C.  
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# What States need:

- Inventory, Modeling and Documentation to support:
  - 8-Hour Ozone SIPs
  - CAIR SIPs
  - PM fine SIPs
  - Regional Haze SIPs

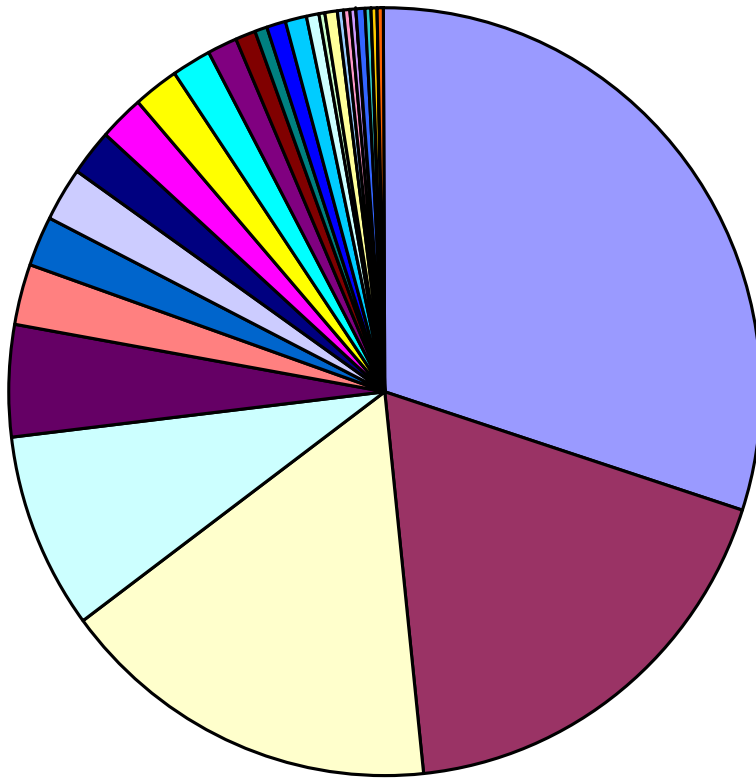
# What CAIR Provides

- Significant added controls on EGUs
  - Cap and Trade Program covering most, but not all of our states
  - Generally not soon enough or deep enough for Ozone attainment
  - Preliminary Modeling shows closer for PM fine
- Summertime Caps
- Fuel adjustment factor
  - Rewarding inefficiency
  - Rewarding recalcitrance
  - Effect – for OTR, generally tighter caps in final rule from proposed
  - Equitability for Regions?
- Model Rule with Cap and Trade Program Structure
- Declaration that Transport has now been addressed

# Options?

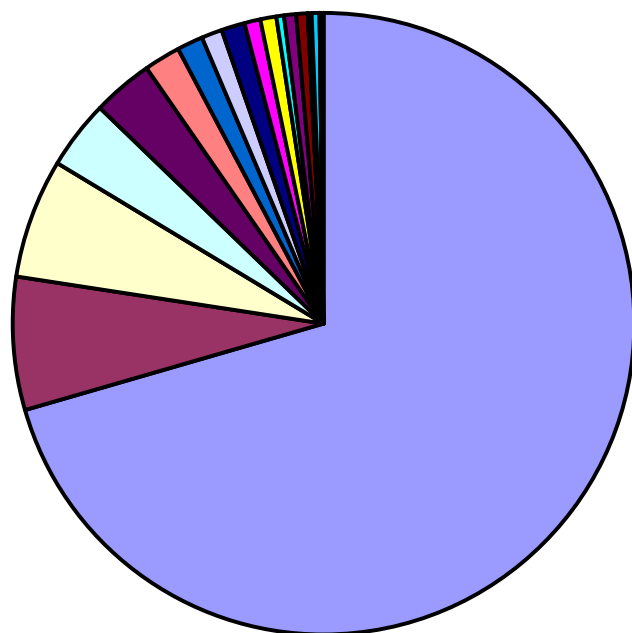
- State Opt in
  - Only RI and possibly NH?
- Source Opt in
  - By Source request or State Source Category Inclusion
    - Industrial Boilers (add allowances diverted to IB to EGU cap)
  - Potential but uncertain opportunity for states to
    - Adjust allocation of Compliance Supplement Pool (CSP)
    - Adjust retirement ratios?
- Formula for Output-Based Emission standards

## Summary of Annual NOx Emissions (2002, MANE-VU)



- Mobile Sources-Highway Vehicles-Gasoline
- Mobile Sources-Highway Vehicles-Diesel
- External Combustion Boilers-Electric Generation
- Mobile Sources-Off-highway Vehicle Diesel
- Stationary Source Fuel Combustion-Residential
- Stationary Source Fuel Combustion-Commercial/Institutional
- Industrial Processes-Mineral Products
- External Combustion Boilers-Industrial
- Mobile Sources-Railroad Equipment
- Mobile Sources-LPG
- Mobile Sources-Marine Vessels, Commercial
- Stationary Source Fuel Combustion-Industrial

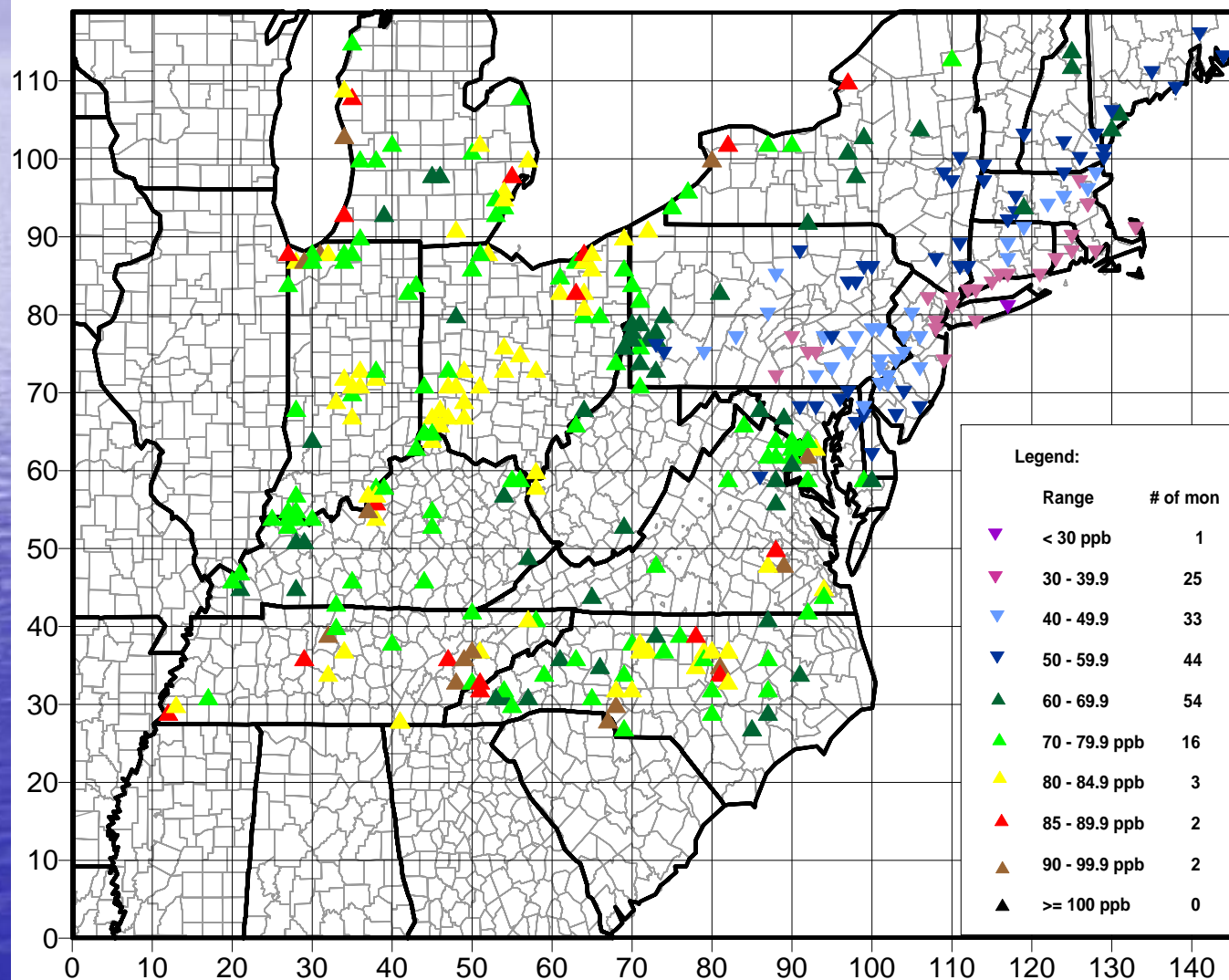
## Summary of Annual SO2 Emissions (2002, MANE-VU)



- External Combustion Boilers-Electric Generation
- External Combustion Boilers-Industrial
- Stationary Source Fuel Combustion-Residential
- Stationary Source Fuel Combustion-Commercial/Institutional
- Stationary Source Fuel Combustion-Industrial
- Industrial Processes-Mineral Products
- Mobile Sources-Off-highway Vehicle Diesel
- Mobile Sources-Highway Vehicles-Gasoline
- Mobile Sources-Marine Vessels,

# Ramifications – Zero Anthropogenic OTR

CALGRID Modeling Domain, Maximum Adjusted Control Case 8-hour Ozone Concentrations at Ozone Monitors  
2010 CSI, Zero Out Anthropogenic Emissions in the OTR



# Ramifications

Transported Ozone (ppb)	# Monitors	% of Standard
< 30 ppb	1	25 %
30-39.9 ppb	25	44 %
40-49.9 ppb	44	56 %
60-69.9 ppb	54	81 %
70-79.9 ppb	16	94 %
80-84.9 ppb	3	106 %
85-89.9 ppb	2	113 %
90-99.9 ppb	2	119 %



# Next Steps

- Continue to understand CAIR
  - EPA Technical Briefing
- Go forward with developing an Implementation Strategy
  - Look at all Sectors – CAIR Plus”
  - Reassess Caps for Multi-P in Context of CAIR – “CAIR Plus”
  - Focus on Attainment
  - Stakeholder Involvement
  - Other State and RPO Communication and Involvement
  - Re-modeling
    - Weight of Evidence
    - IPM – with regional haze RPO partners and independently
- Commission Update
  - Fall Meeting
  - Special February Meeting?