

Stationary and Area Source Committee Recommendations for Control Strategies

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Source Analysis

- Work to Date
 - State-led analysis
 - Emission reductions, implementation options, program elements
 - Committee deliberation and recommendations
- Findings
 - Little “low hanging fruit”
 - Opportunities for updating regional measures
 - Opportunities for regional approach to energy efficiency/conservation and distributed generation

Source Recommendations

- Program/Project Evaluation
 - RACM Benchmark
 - establish baseline in OTR
 - develop categories with potential for greater reductions
 - pursue opportunities to leverage upwind reductions
 - NSR Threshold
 - most states appear to be affected by reclassification
 - need to further evaluate state requirements and options to maintain current major source requirements
 - Pilot Programs for Energy Efficiency/Renewable Energy
 - leverage existing resources
 - OTC survey work
 - analysis software (OTC, STAPPA)
 - multiple state initiatives and pilots
 - develop regional approaches

Recommendations cont.

- Additional VOC/Area Source Controls
 - Define additional measures based on ongoing work including tightening/revisiting existing standards:
 - modeling inventories/baselines to identify reductions
 - guidance/ menu of options being developed by other MSOs
 - EPA short-term strategies work (CAAAC subgroup)
 - Perform survey (AIM) to evaluate rule implementation
 - Quantify emission reductions
- Distributed Generation
 - Wide variation of approaches in states despite previous model rule efforts
 - Baseline of control needed in region
 - Common approach needed for new and existing sources – as well as common definitions

Steps to Development

- Develop in-depth analysis and implementation options
- Assess emission reductions
- Coordinate development and analysis with Control Strategies Workgroup
- Develop Recommendations

Commitment of Resources

- State staff to lead program development
- Staff and financial resources for further technical analysis
- Regional consensus to move forward