

Ozone Transport Commission Fall Meeting

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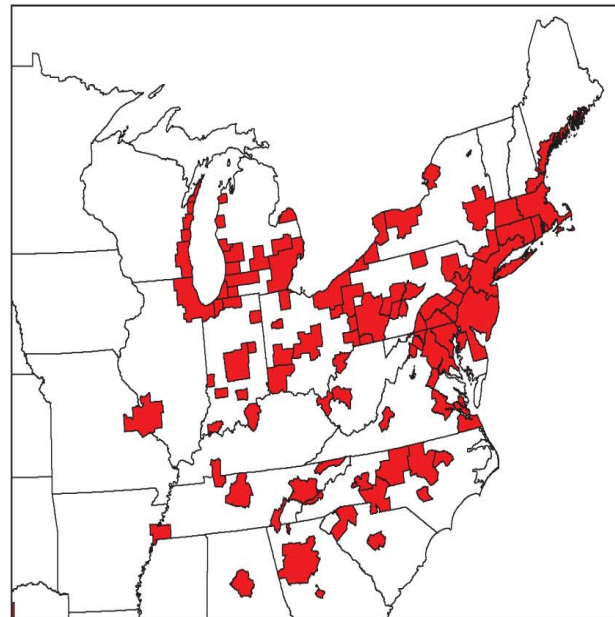
OTC Efforts To Date

- Encouraged by OTC efforts to address all types of sources (mobile, area, peaking units, etc.)
- Aware of all of the modeling work going on to assist in developing attainment demonstrations
- Appreciate all of this hard work

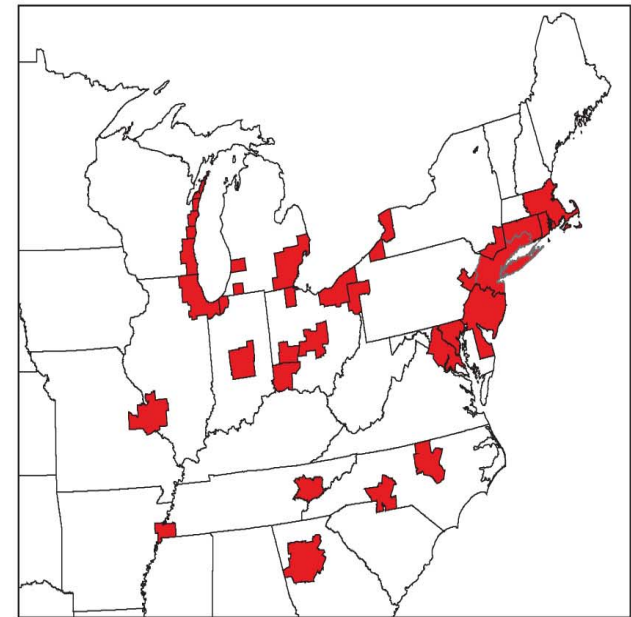
NO_x Budget Trading Program (NBP) Providing Greater Ozone Reductions than Predicted

- Nearly 70 % of Areas in the Eastern US that Didn't Meet the Ozone Std in 2004 Had Better Air than the Std Requires in 2005
- Preliminary Results for the 2006 Ozone Season Suggest Further Overall Improvement

**8-Hour Ozone Nonattainment Areas,
April 2004 (2001–2003 Air Quality Data)**



**Areas Remaining Above Standard
(2003–2005 Air Quality Data)**



Note: Included on the maps, but excluded from the analysis, are four areas with incomplete data for 2003 to 2005 (Cass Co, MI; Dayton-Springfield, OH; Essex Co (Whiteface Mtn), NY; La Porte, IN).

High Energy Demand Day (HEDD) NO_x Reduction Strategies

- Clean energy options (including enhanced energy efficiency, demand response, and combined heat and power) could provide significant benefits
- Opportunities for command and control may exist, but may be costly
- Use of CAIR allowances to encourage additional HEDD reductions raises concerns

Clean Energy Options Provide Multiple Benefits

- In the long term save money
- Additional environmental benefits beyond NO_x reductions
- A way to reduce NO_x from EGUs that is not constrained by limited ability of power sector to do more by 2010

How EPA Can Help with Clean Energy and Mobile Strategies

- Provide Clean Energy technical guidance
 - Modeling of strategies
 - Best practice documents to provide more tangible sense of types of programs that OTC could pursue
- Support mobile source efforts such as SmartWay Transport Partnership
- Help resolve policy issues relating to obtaining SIP Credit

Maximum Attainment Dates for 8-Hour Ozone N/A Areas

- Subpart 1– June 15, 2009
(up to June 15, 2014)
- Marginal – June 15, 2007
- Moderate – June 15, 2010
- Serious – June 15, 2013
- Severe 15 – June 15, 2019
- Severe 17 – June 15, 2021
- Extreme – June 15, 2024

Areas That Cannot Attain

- Attainment Demonstrations due for all areas in June 2007
- If State cannot demonstrate attainment by the appropriate deadline, the State should submit a bump up request

WOE—Types of Evidence Possible (from Modeling Guidance)

- EPA guidance allows a State to demonstrate attainment through a WOE approach even if modeling does not show attainment
- For areas with modeled values either just below or above the standard, EPA guidance recommends you look at:
 - Trends in Ambient Air Quality & Emissions
 - Observational Models
 - Receptor Models
 - Indicator Species
- Any of these factors can be used to help explain why you believe the model may be underpredicting the benefits of control strategies
- Being within the recommended range in the guidance is not sufficient unless you submit a WOE analysis