



**Department of the Environment**

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# **A Proposed Framework for Implementing the OTC HEDD**



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- HEDD initiative is complex
- SIP deadlines are looming
- Adopting the HEDD as formal SIP “regulations” may be difficult to do given the time constraints and the complexity
- Need to find an alternative implementation approach



# A Proposal

- Implement the HEDD Initiative through a formal, but voluntary partnership
- Include the partnership as a creditable element of the SIP
- The Initiative may include multiple “programs” and include voluntary and incentive-based efforts
  - There may also be a regulatory component



# How Would This Work?

- EPA has pushed forward with a variety of policies that allow non-traditional programs to be “credited” in SIPs
  - Voluntary, incentive-based, education driven, etc.
- EPA has also expanded the use of “Weight of Evidence” as part of the attainment demonstrations
- The HEDD Partnership could fit into either of these options



# Building the Partnership

- Step 1
  - Establish the Partnership
- Step 2
  - Identify the “bundle” of initiatives or programs that will be tested and implemented between now and 2009





# SIP Credit



- **Step 3**

- Using the best available data, estimate potential reductions, or a goal, from the measures in the bundle

- **Step 4**

- Model air quality benefits
- Include detailed description of Partnership and bundled measures in the SIP
- Identify efforts to improve emission reduction estimates as measures are implemented

# Implementation and “True-Up”



- Step 5 - Implement
- Step 6 – Fine tune measures as needed
- Step 7 & 8 – Attain standards in 2010 and “true-up” the HEDD
- Step 9 - Adjust SIP as needed

# Issues



- Need for initial emission reduction estimate or “goal” by October 2006
  - Don’t let perfection delay progress
- Determining which measures to include in the bundle
  - Keep things manageable
  - Blend similar measures?
  - Responsibilities for implementation
- Combining regulatory and voluntary initiatives in the Partnership