

A Proposed Framework for Implementing the OTC HEDD



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Issues

- 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, incentivebased, 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







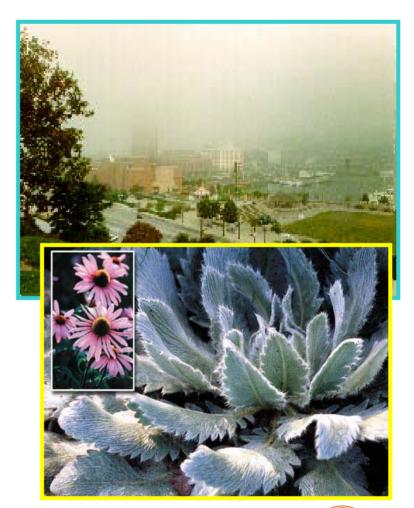
Building the Partnership

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