

# Stationary Sources Joint Forum: Next Steps

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# Summary of Project Milestones

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- Complete projects
  - Report on NO<sub>x</sub> Controls for EGUs
- Projects expected to be complete by 12/31/05
  - Oil and gas emissions inventory
  - 2002 and 2018 Point and Area Source Emissions Inventory
    - States and Tribes
  - Updated list of BART eligible sources
    - Focus on SO<sub>2</sub> and NO<sub>x</sub> from EGUs
    - Attention paid to other source categories

# Forum Goals

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- Revisit and rejustify the 309 Annex for SO<sub>2</sub> emissions in the 5 states
- Develop a SO<sub>2</sub> trading alternative for non-309 states and tribes?
  - Additional states and tribes participate in the Annex program?
- Develop a NO<sub>x</sub> trading alternative for all states and tribes
- Provide support for source-specific BART
  - Technical support
  - Guidance and coordination

# Next Steps

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- Project milestones form basis for on-going work
- Formation of Three Workgroups
  - Revisions to the SO<sub>2</sub> Annex
    - What are the 309 States contemplating?
  - Alternatives to BART
    - EPA's final rule on alternatives to BART expected
  - Source-Specific BART
    - Case-by-case analysis coordination

# Revisions to SO<sub>2</sub> Annex

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- Workgroup activities
  - Evaluate the BART or alternative options once EPA has finalized its rule package
  - Expand to other tribes and states?
  - Conduct an analysis of the 309 milestones
    - Use latest inventory information
    - Base on 2018 forecasts for:
      - Electrical Generating Units (EGUs)
      - Possible/expected BART reductions

# Alternatives to BART

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- Overlap of Annex workgroup participants expected and encouraged
- Workgroup activities
  - Evaluate the options once EPA has finalized its “Alternatives to BART” rule package
  - Evaluate various 2018 control scenarios for EGUs
    - Scenario “A”: includes known future controls and presumptive BART limits for NO<sub>x</sub> and SO<sub>2</sub>
    - Additional scenarios
      - Example: NO<sub>x</sub> combustion controls for all EGUs regardless of BART applicability

# Alternatives to BART Cont.

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- Workgroup activities continued
  - Develop approaches for demonstrating alternative is better than BART
    - Greater reasonable progress approach
    - Simplified source-specific BART approach
  - Identify options of interest for alternative NO<sub>x</sub> program under 308
    - Which tribes and states would interested?
    - What is industry's view?
    - Utility program only, or also include non-utility sources?
      - Where do we draw the eligibility line?
      - When do they get phased into the program?

# Alternatives to BART Continued

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- Workgroup activities continued
  - Participating tribes and states identify non-utility sources for potential control and inclusion
    - BART sources
    - Non-BART sources
      - Greater than 100 TPY sources?

# Source-Specific BART

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- Workgroup activities
  - Some states moving forward with a case-by-case, source-specific BART analysis
    - Discuss issues and share information on the approaches being evaluated or implemented
    - Identify areas where WRAP can assist or help coordinate activities
      - Modeling protocol requirements
      - Clearinghouse for BART determinations
    - Discuss opportunities for Tribes and States to enter trading market after analysis is complete

# Workgroup Assistance

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- Workgroups currently being formed
  - Member and stakeholder input key to success
  - Contractor assistance may be necessary to assist with technical aspects
- Goals
  - Priority given to developing consensus
  - Produce technical and analytical products necessary for the 12/17/07 State and Tribal Implementation Plan deadline.