





#### Interstate Transport- UPDATE CAA section 126(b) and more

April 12, 2018 Ric Pirolli SIPRAC



# CAA section 126(b) Petition





Note: Explanatory text in the timeline above links to the document referenced.

# **Transport Rules**

Purpose- Federal "backstop" for implementing the "Good Neighbor" provisions of the Clean Air Act when a state fails to submit a SIP or the SIP is inadequate

History:

- NOx Budget Trading Program
- CAIR
- CSAPR
- CSAPR Update 🔺

The Update:

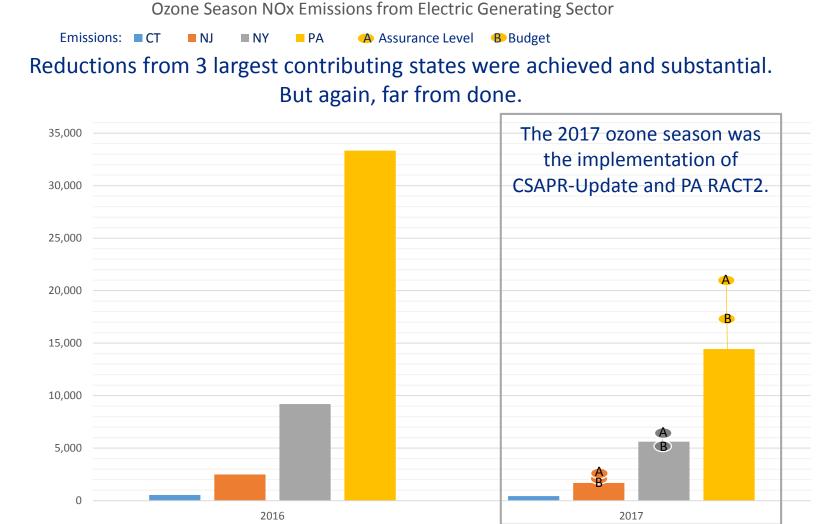
- CSAPR Update implementation resulted in significant emissions reductions.
- Further progress is needed to attain the 2008 standard.
- No indication at this point that a full remedy for 2008 will occur or what if any rules will be implemented for the 2015 standard.



Connecticut Department of Energy and Environmental Protection

The results are in! What was the impact...

### **Electric Generation Emissions**



Note Connecticut is displayed for comparison purposes, Connecticut was not included in CSAPR Update.



NOx Emissions (tons)

#### Connecticut Department of Energy and Environmental Protection

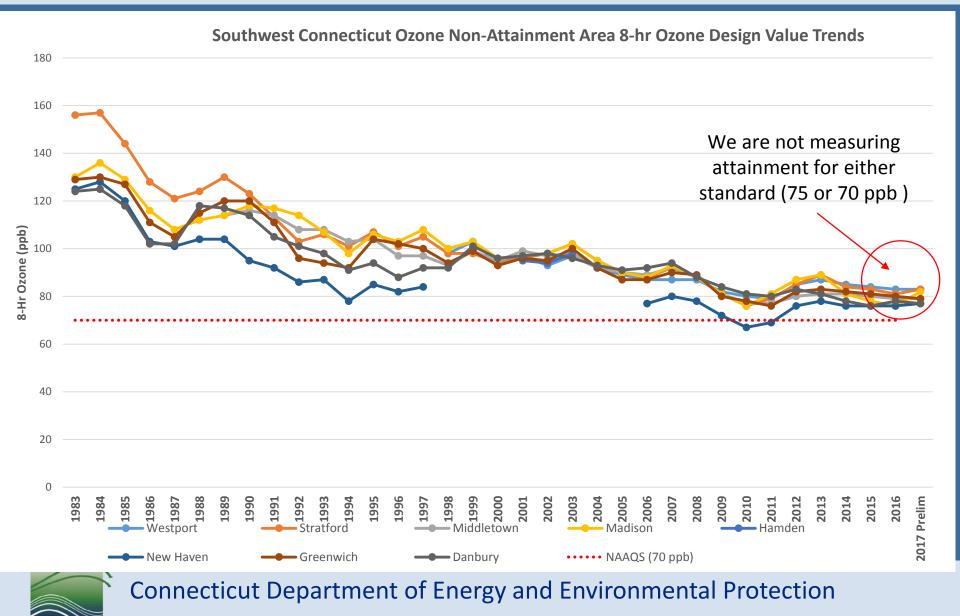
Sources: https://ampd.epa.gov/ampd/ https://www.epa.gov/airmarkets/final-cross-state-air-pollution-rule-update

### **CSAPR Update Results**

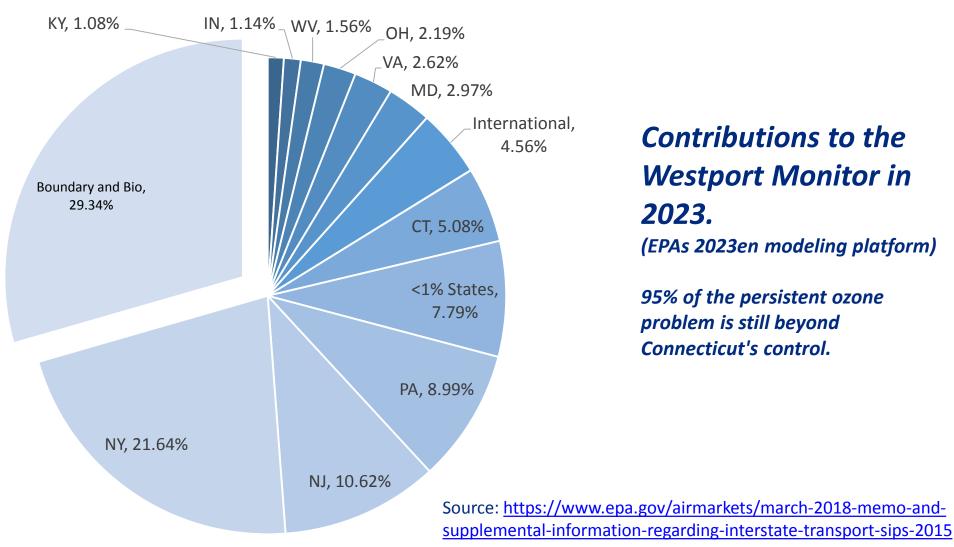
- The reductions that were targeted by the rule were achieved and with little need for the banked allowances.
- During the ozone season which these reductions occurred (2017) we still measured violations of both the 2008 and the 2015 ozone standards. (Recall we had cold August!)
- Even projections (which have been under estimating) still result in CT nonattainment. Projections still indicate over 90% due to sources beyond Connecticut's authority.



### **Further Progress Needed**



#### Nor are we projected to measure attainment. Westport is Projected to be 73.7 ppb in 2023.



# New EPA Transport Memo

Purpose - to inform SIP development for the 2015 Ozone Good Neighbor SIPS (Due 10/1/2018)

Summary:

- Released March 27, 2018
- The 2023en modeling is acceptable to use in GN SIPs if appropriate for your state.
- EPA outlines a four step framework. (However, EPA does not preclude other approaches).
- Step 1-2 of the four step framework were addressed in memo for states should using the 2023en modeling supplied.
- States are expected to address cost; caveats are made if regarding special circumstances like international transport.





#### Questions

