# The Revised CSAPR Update

SIPRAC

December 10, 2020

Connecticut Department of ENERGY & ENVIRONMENTAL PROTECTION

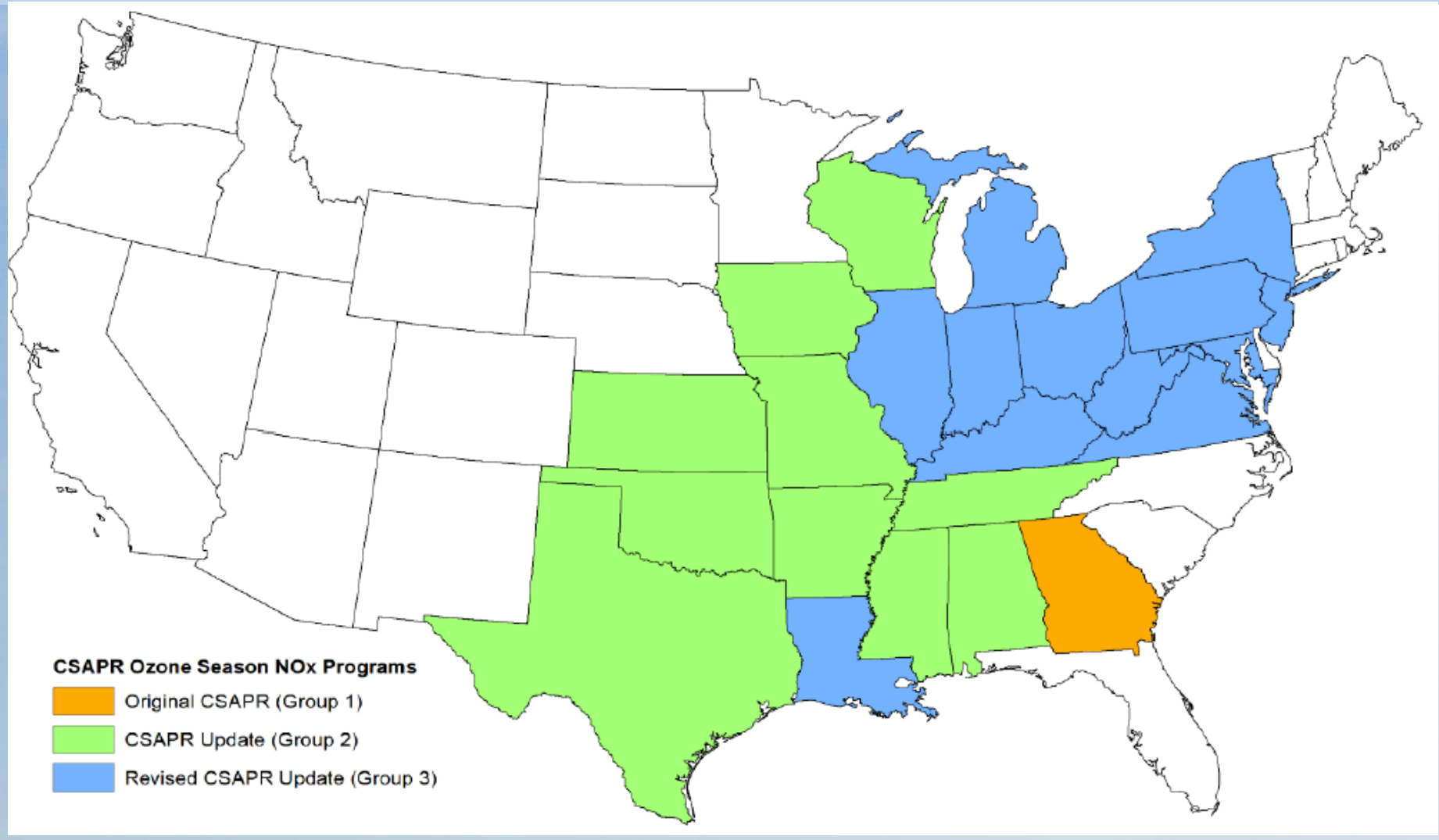
Bureau of Air Management

CONNECTICUT WORKING TOGETHER FOR CLEAN AIR

# Revised CSAPR Update

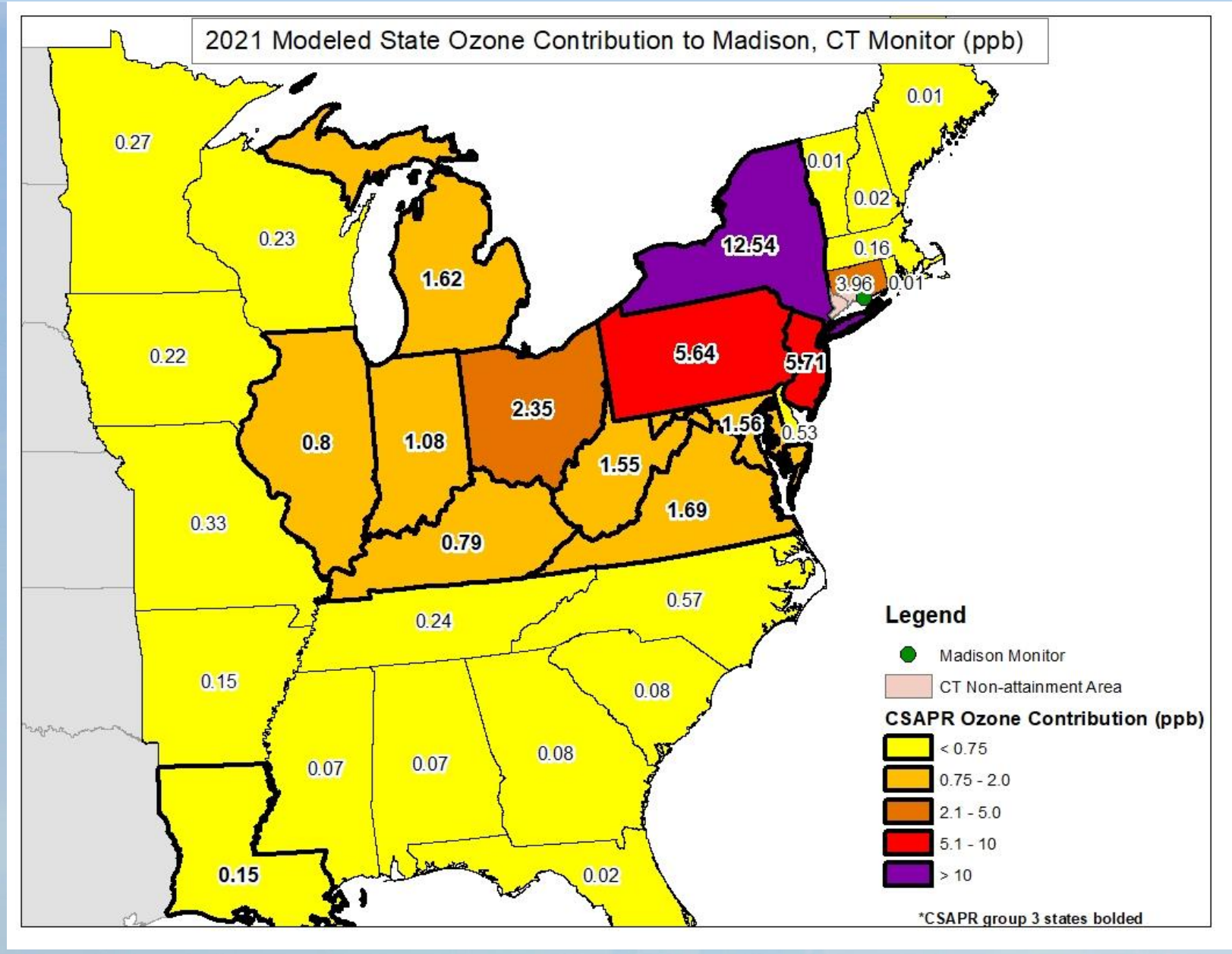
- Results from Court Ruling Wisconsin vs EPA
  - Decided September 13, 2019
  - Uses Fairfield County Monitor as example critical of CSAPR Update (pp.19-20)
- Published October 30, 2020 in the Federal Register
- Hearing held November 12
  - DEEP supplied comments.
- Written comments due Monday, December 14th
  - 45 day extension requested.

# CSAPR Groups

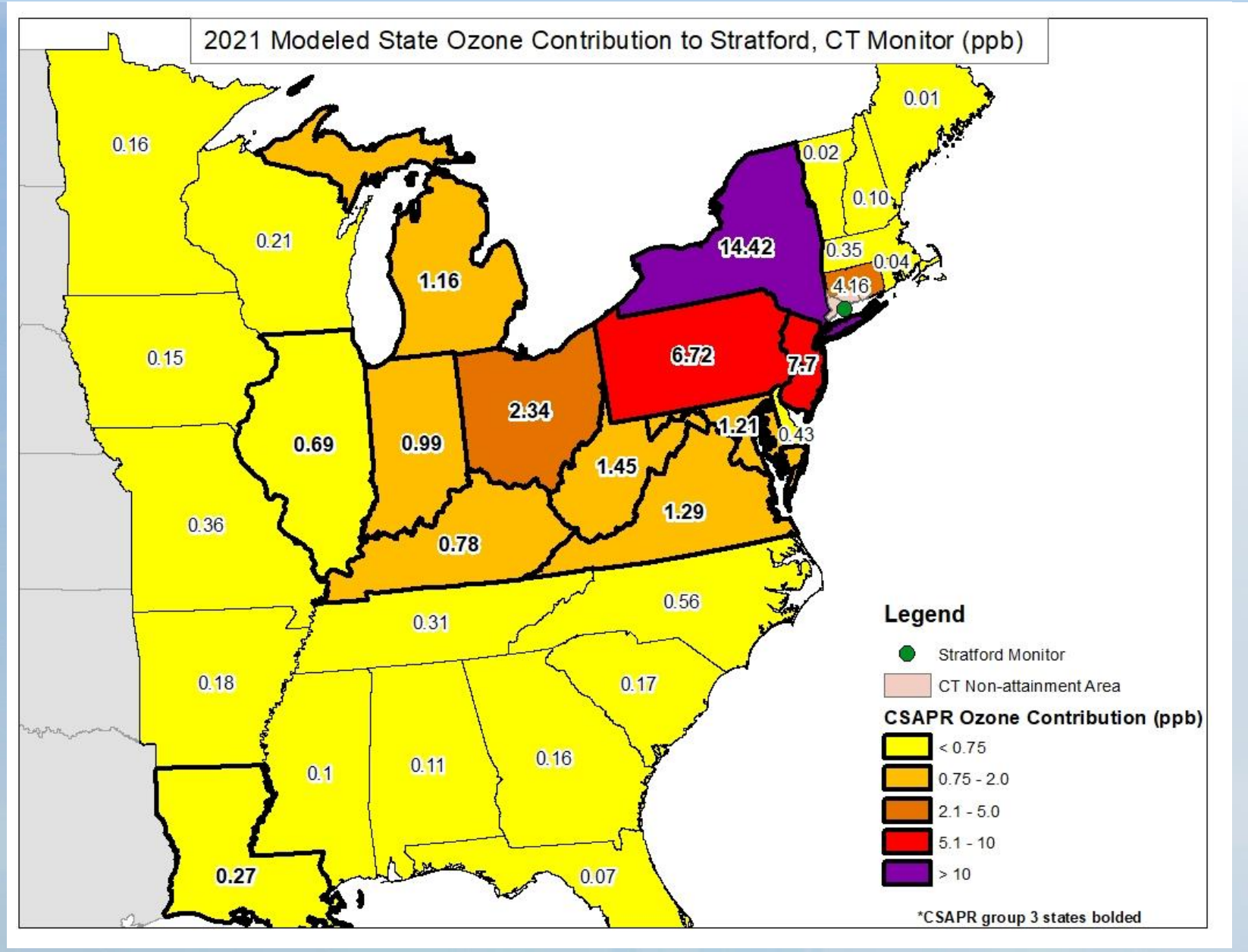



- Group 3 States will get new NOx budgets, while EGUs in the remaining 10 states covered by the CSAPR Update would continue to comply with the Group 2 program.

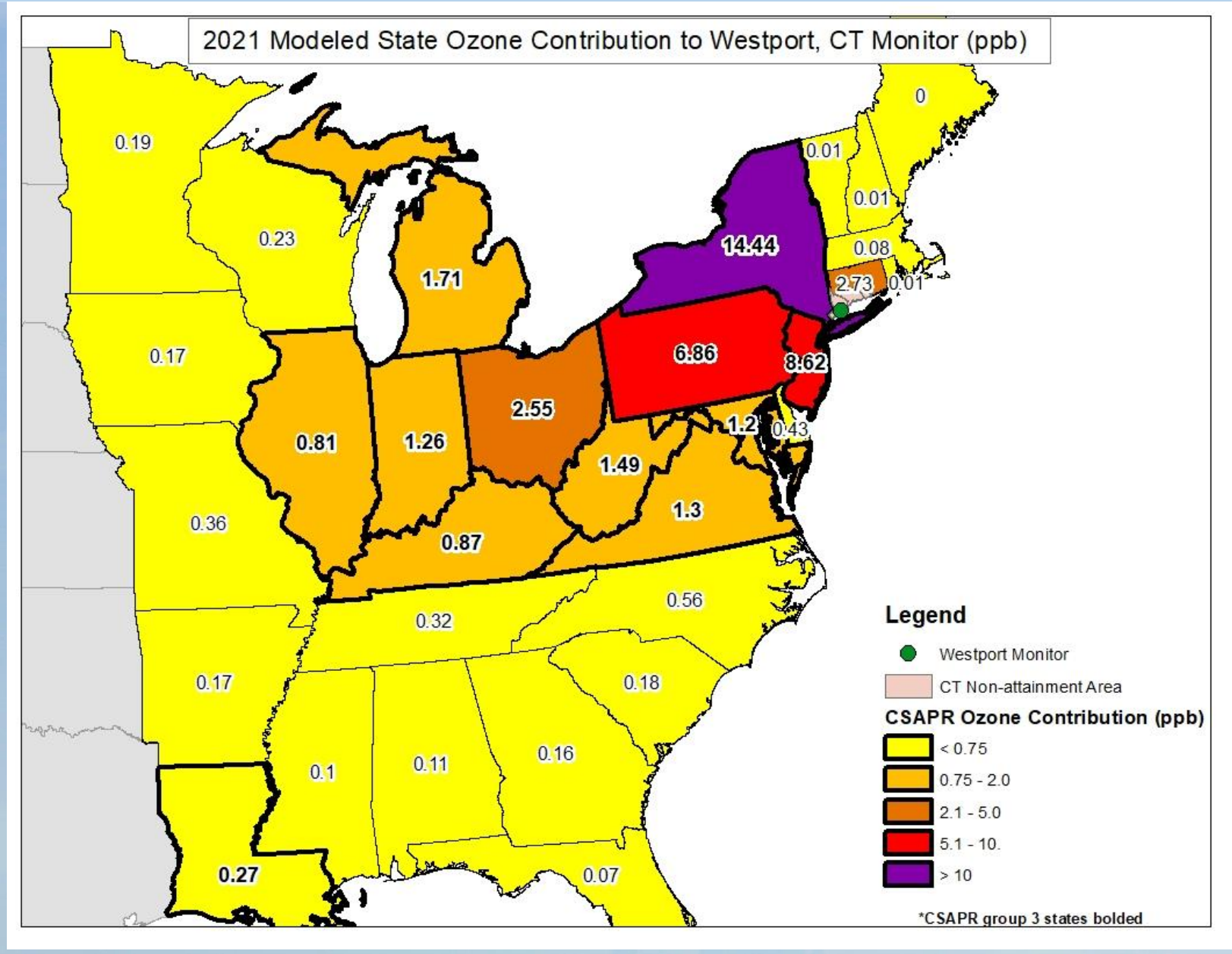
# 2021 Ozone Contribution to Madison, CT



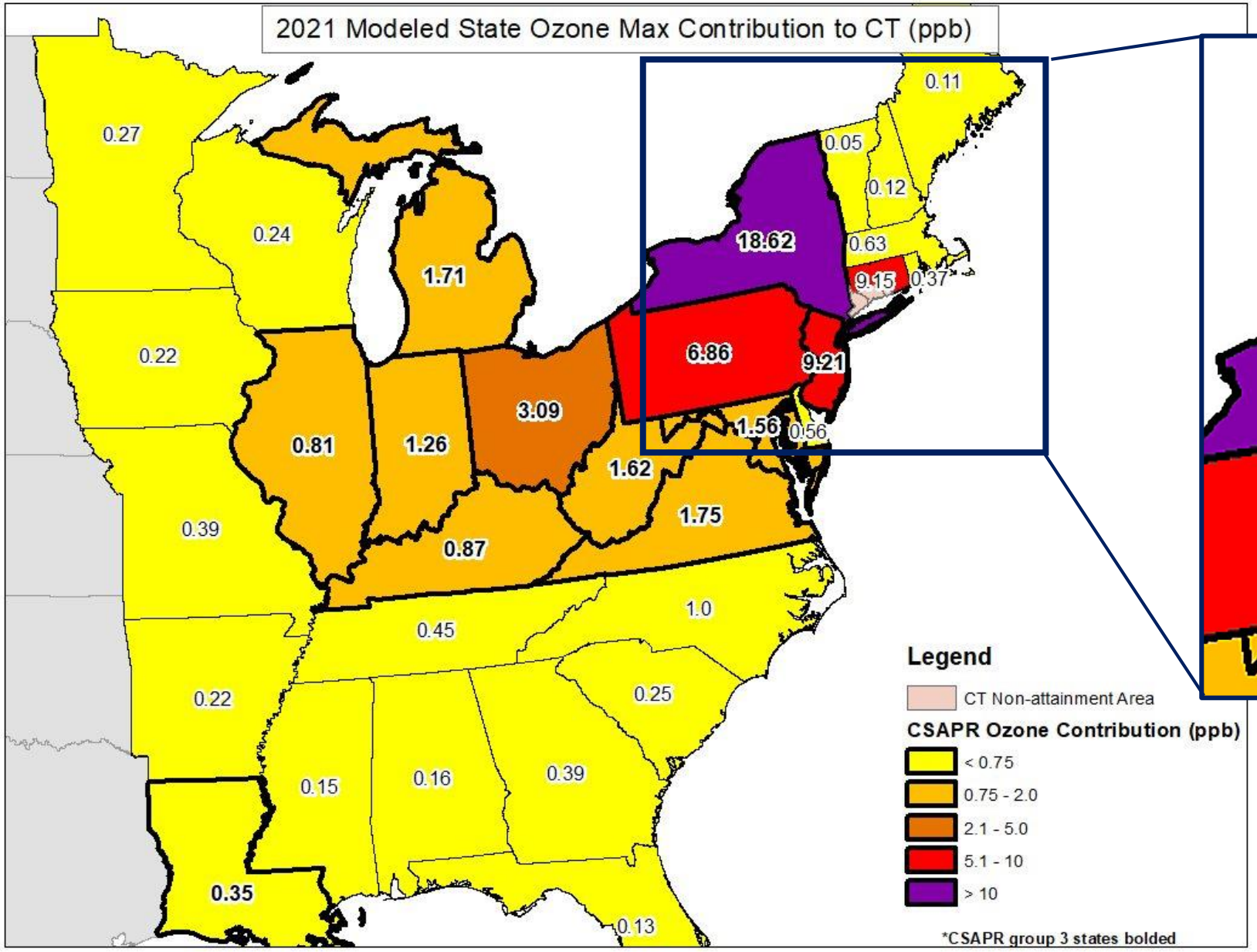
# 2021 Ozone Contribution to Stratford, CT

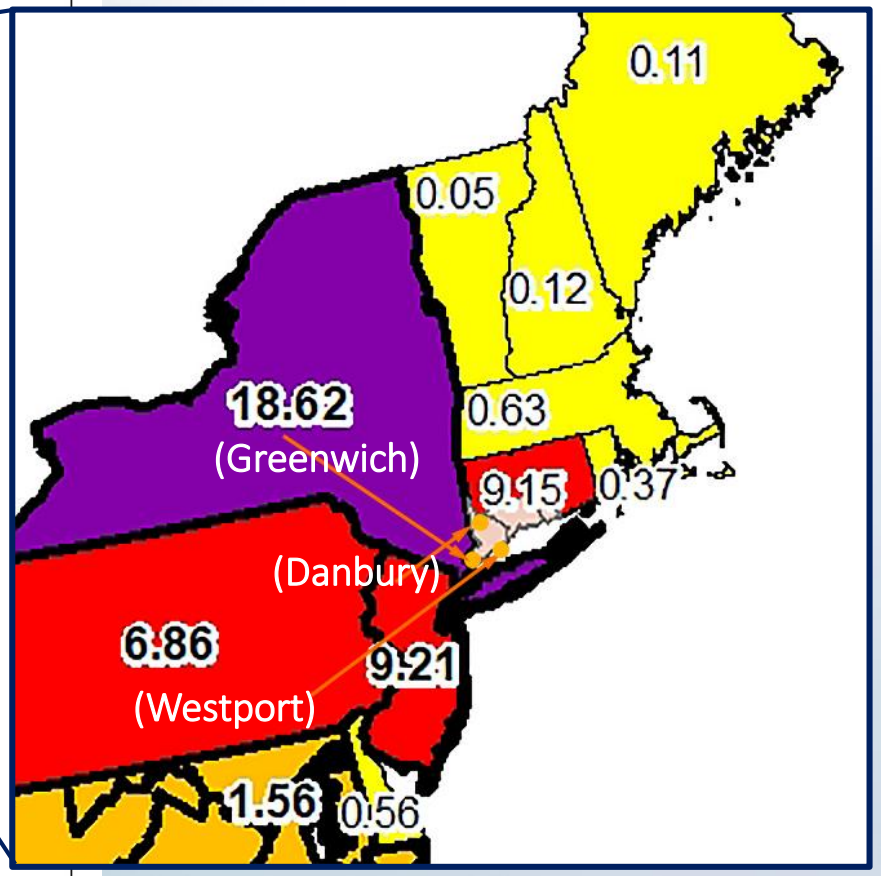


# 2021 Ozone Contribution to Westport, CT



# 2021 Maximum Ozone Contribution to CT

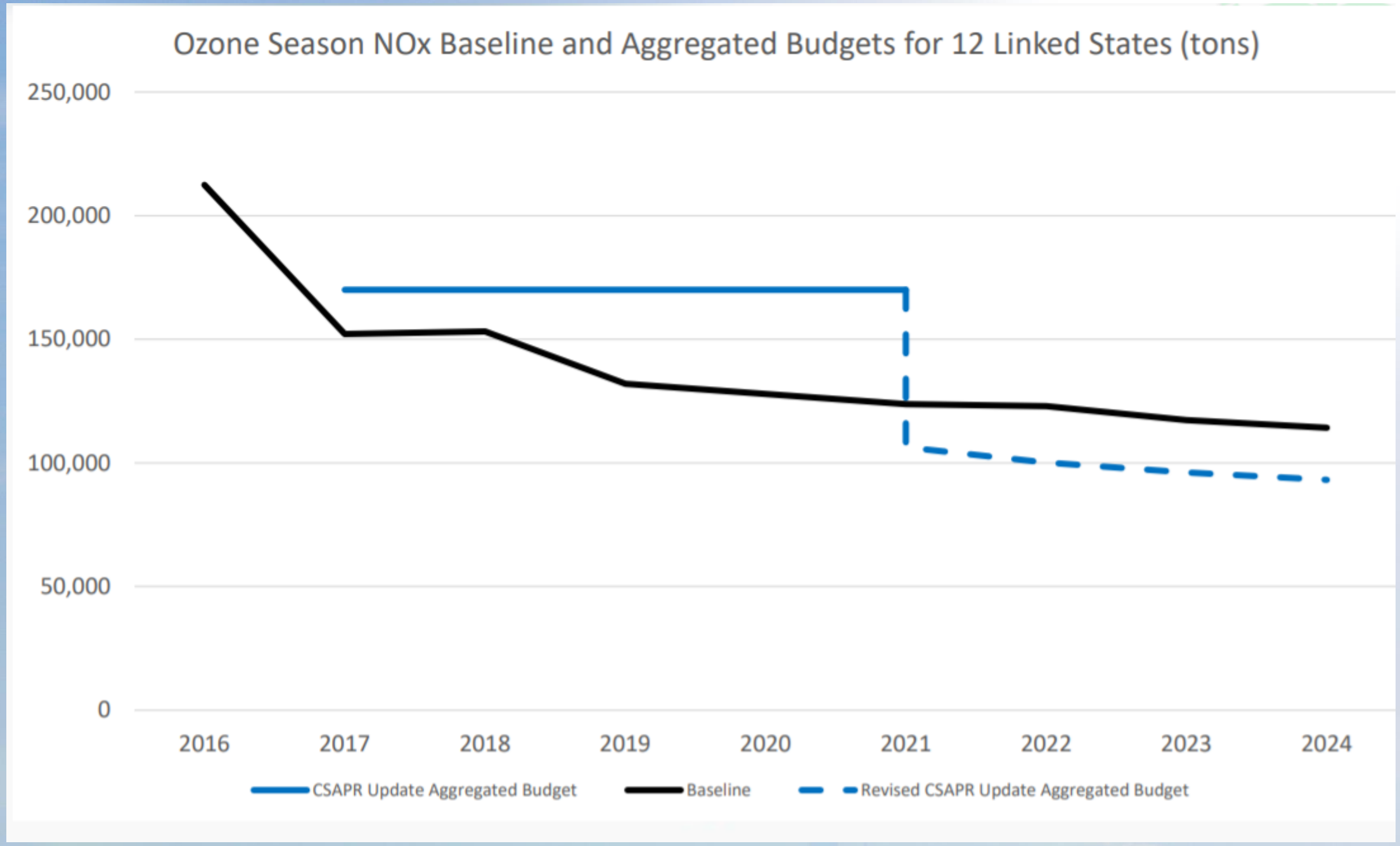


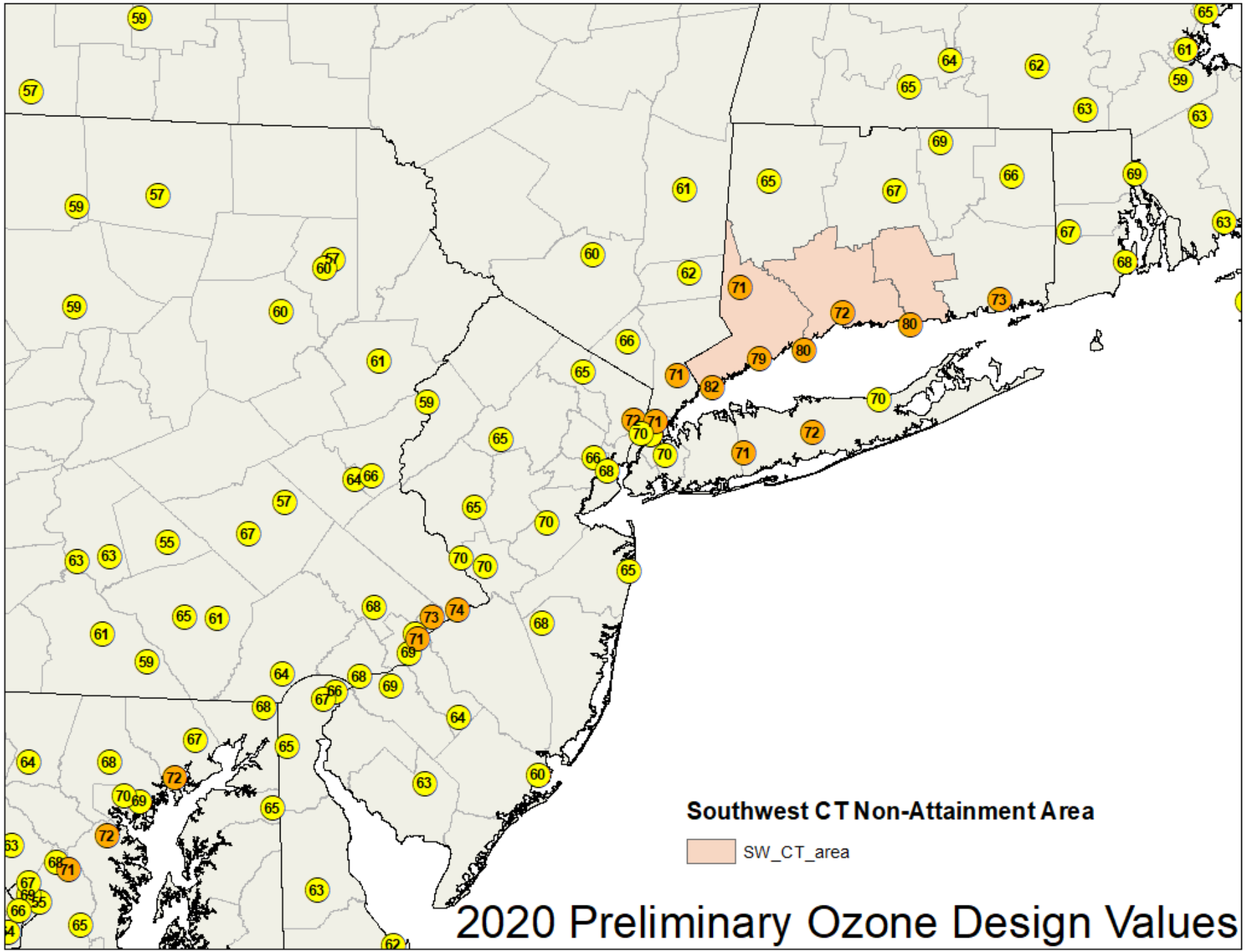




Note that New York and New Jersey had higher contributions to other monitors not being considered. Connecticut also contributes 9.15 ppb of ozone to the Groton monitor.

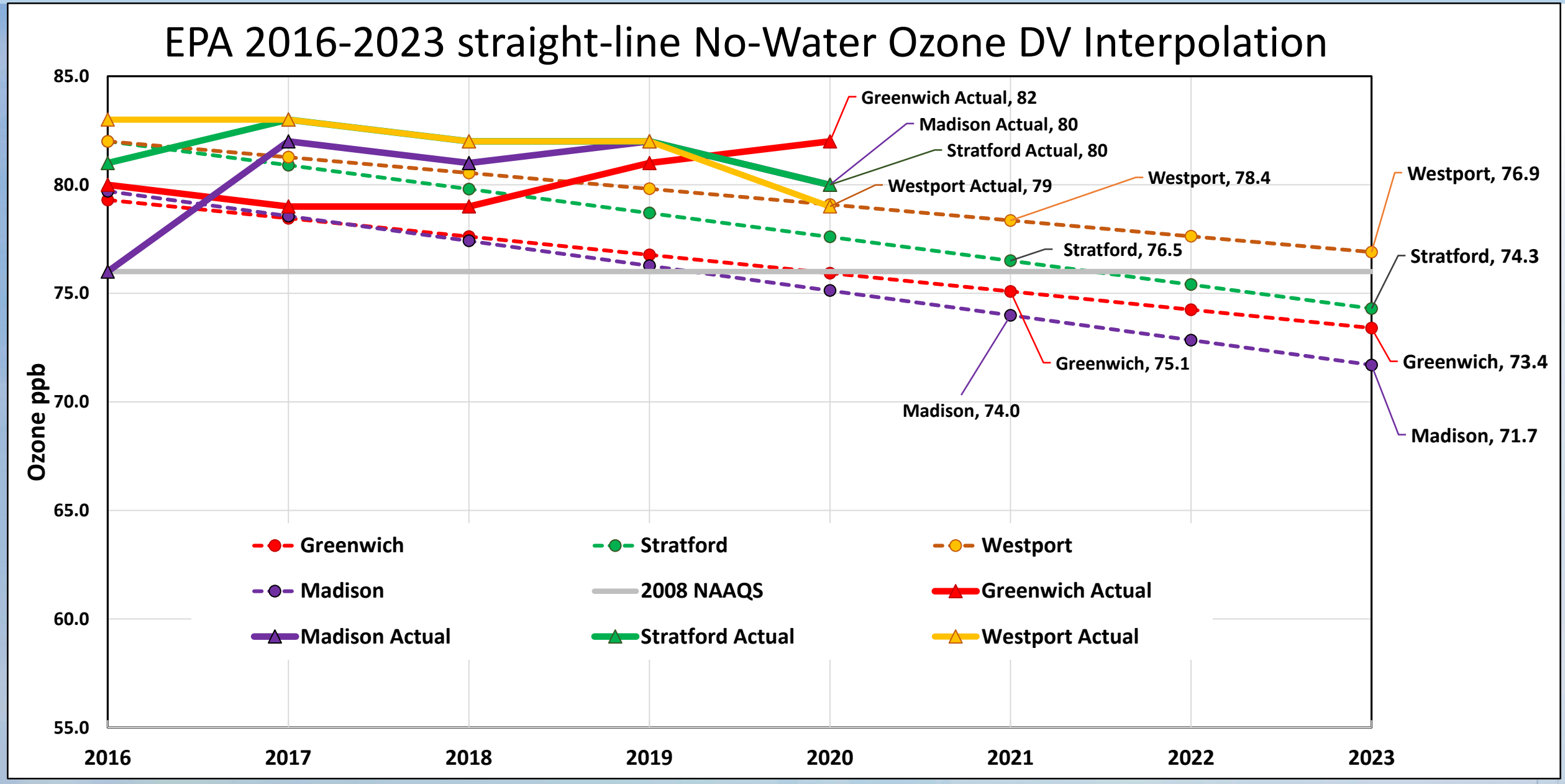
# Major Provisions for EGUs

- **Mitigation strategies:** Evaluated emission reduction potential from the same suite of technologies considered by EPA in the CSAPR Update: Low NOx Burners (LNB); optimizing existing selective catalytic reduction (SCR) and selective non-catalytic reduction (SNCR) controls; and installing new SCR and SNCR controls.
- **Proposed control strategy**: EPA proposes to identify required emissions reductions based on the $1,600 per ton level control strategy associated with optimizing existing SCRs and upgrades to state-of-the-art combustion controls.
- New FIPs and new emissions budgets are proposed for the 12 linked states.
- Ozone season budgets are established for each year decreasing from 106,280 tons in 2021 to 93,092 tons 2024 and beyond.
- **2021:** Optimization of existing SCR controls; **2022 –2024:** Continued optimization of existing SCR controls plus upgrade of combustion control.


Ozone Season NOx Baseline and Aggregated Budgets for 12 Linked States (tons)
250,000
200,000
150,000
100,000
50,000
0
2016
2017
2018
2019
2020
2021
2022
2023
2024
CSAPR Update Aggregated Budget
Baseline
Revised CSAPR Update Aggregated Budget


Southwest CT Non-Attainment Area
SW_CT_area
2020 Preliminary Ozone Design Values

# Connecticut Monitored and Modeled Ozone DVs



| Monitor | EPA Predicted Design Values (by method) | | | | Preliminary 2020 Design Value from Monitored Data | 4th High Monitored Component of Design Value | | | Necessary 2021 4th High to attain 2021 No Water Average |
|---|---|---|---|---|---|---|---|---|---|
| | 2021 3x3 Average | 2021 3x3 Maximum | 2021 No Water Average | 2021 No Water Maximum | | 2018 | 2019 | 2020 | |
| Greenwich | 75.7 | 76.3 | 75.0 | 75.7 | 82 | 86 | 84 | 77 | 64.0 |
| Stratford | 77.0 | 78.0 | 76.5 | 77.4 | 80 | 83 | 82 | 76 | 71.5 |
| Westport | 77.7 | 78.0 | 78.5 | 78.8 | 79 | 84 | 81 | 73 | 81.5 |
| Madison | 73.4 | 75.5 | 73.9 | 76.1 | 80 | 77 | 84 | 80 | 57.7 |

# Connecticut Comments to EPA

- EPA's cost effectiveness threshold of $1,600 per ton is extremely low.
- Process for implementing contingency measures should be established.
- Non-EGU emissions should continue to be evaluated.
- Controls to be optimized and run on a daily basis.
- Performance standards are preferable to trading programs.