



PSD/NSR Update



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Some PSD/NSR History

- 1970 CAA - “Prevention of Significant Deterioration”
- 1975 - Supreme Court
- 1977 CAA – Congress “Agrees” and adds NSR for Non-attainment Areas
- 1982 – Reagan Campaign Promise
- 1990 CAA – Few Changes

PSD/NSR Reform Effort

- | | |
|----------------------------------|----------------|
| • Emissions Calculation | Promulgated |
| • Plantwide Applicability Limits | Promulgated |
| • Pollution Control Projects | Court rejected |
| • Clean Unit Provision | Court rejected |
| • RRMR | Vacated |
| • Debottlenecking | Proposed |
| • Project Aggregation | Proposed |
| • Reasonable Possibility | Promulgated |
| • Project Netting | Proposed |

PSD/NSR Reform Effort

- NSR for Utilities Proposed
- Indian Country Proposed
- Nonattainment NSR Promulgated
- PM2.5 Rule Proposed
- Modeling Procedures Proposed
- Flexible Permit Rule Proposed

New Administration Responses

- Executive Order on all Proposed Regulations
- Stay and Intent to Revise Debottlenecking
- Stay and Intent to Revise Aggregation Rule
- Stay and Intent to Revise PM_{2.5} Rule
- Intent to Reconsider Reasonable Possibility and Fugitive Emissions
- Intent to Finalize Flexible Air Permits
- PSD/NSR Letters by Administrator

Current Status

Massachusetts

Delegated

Region

New Hampshire

SIP

Revised

Connecticut

SIP

No Revision

Rhode Island

SIP

No Revision

Vermont

SIP

No Revision

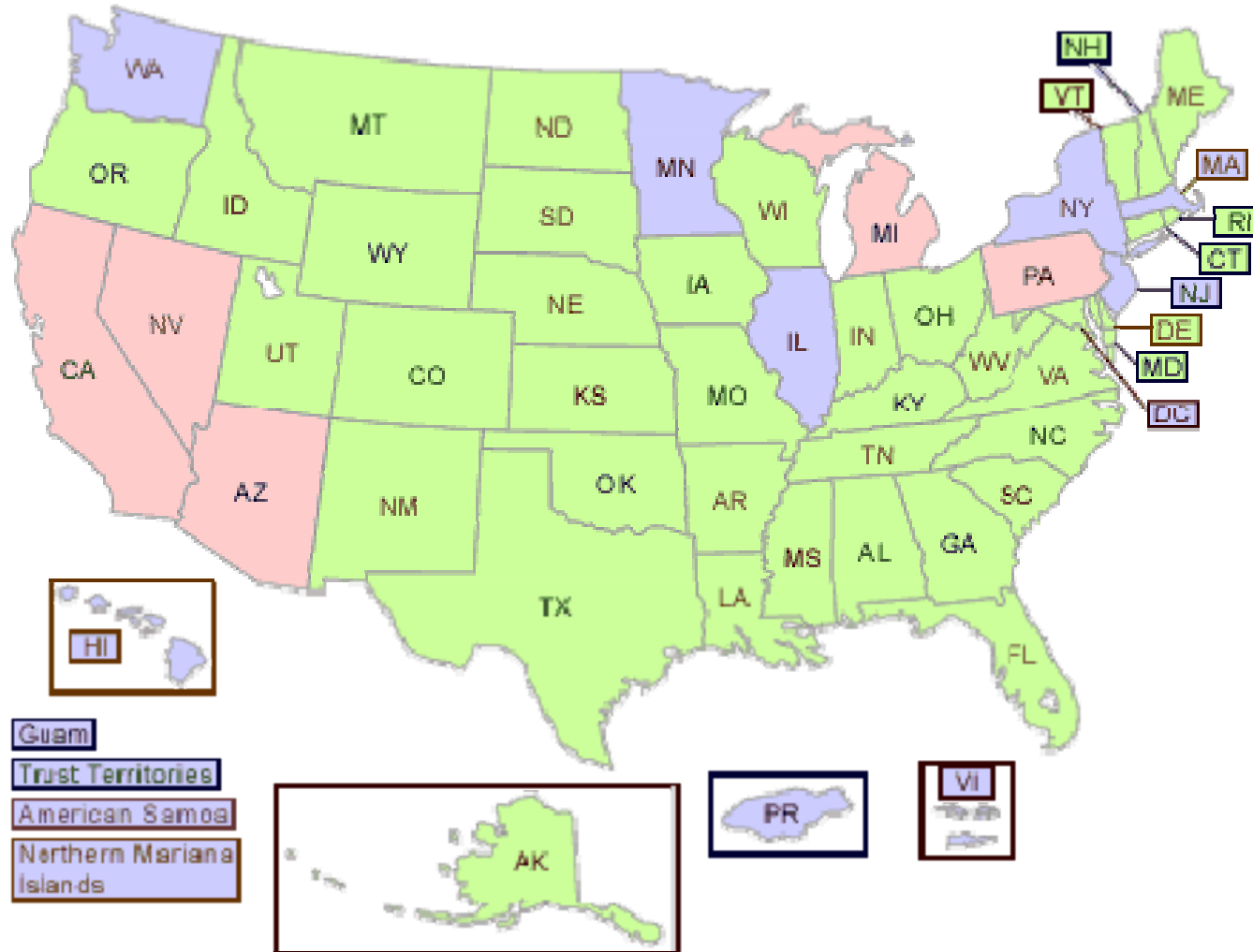
Maine

SIP

No Revision

Nation Wide Program Status

Prevention of Significant Deterioration (PSD) Permit Program Status September 2009



Proposed GHG Permit Rule

- September 30, 2009 Proposed Rule
- “Tailoring” means not 100 TPY
- Major Source = 25,000 TPY CO₂e (also Title V)
- Significance Level = 10,000 to 25,000 TPY CO₂e
- For Title V (emissions data at renewal and existing sources now subject to Title V)
- BACT and “Energy Efficiency Measures”
- Intent to Force Rule on SIP States

Proposed GHG Permit Rule

- What Sources are Subject ?
 - Boilers
 - Gas Fired ~47 MMBTU/Hour
 - Oil Fired ~ 35 MMBTU/Hour
 - Coal Fired ~24 MMBTU/Hour
 - Process Sources (e. g. Ammonia Plants)
- EPA has No Idea of Who is Affected (mentions landfills)

Proposed GHG Permit Rule

- Flying Blind
- 5 year Review of Effectiveness
- Promise of Guidance for States
- Promise of Evaluation of Streamlining the Process
- Expects 14,000 Sources for Title V portion
- Expects 400 NSR Sources/ Year
- Hearings November 18 and 19