Department of Environmental Conservation
Division of Air Resources

NEW YORK STATE IMPLEMENTATION PLAN FOR OZONE (8-HOUR NAAQS)

ATTAINMENT DEMONSTRATION FOR NEW YORK METRO AREA

APPENDIX F

FINAL PROPOSED REVISION FEBRUARY 2008

New York State Department of Environmental Conservation
ELIOT SPITZER, GOVERNOR ***ALEXANDER GRANNIS, COMMISSIONER***

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Final Report

Future Year Electricity Generating Sector Emission Inventory Development Using the Integrated Planning Model (IPM®) in Support of Fine Particulate Mass and Visibility Modeling in the VISTAS and Midwest RPO Regions

Prepared for

Visibility Improvement State and Tribal Association of the Southeast (VISTAS)

Prepared by

ICF Resources, L.L.C.
9300 Lee Highway
Fairfax, VA 22031

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A. Overview

In order to model regional haze, visibility and other air quality issues, Visibility Improvement State and Tribal Association of the Southeast (VISTAS) awarded a contract to ICF Resources, L.L.C. (ICF) in August 2004, seeking ICF's services to generate future year emission inventory for the electric generating sector of the contiguous United States using the Integrated Planning Model (IPM®).

IPM is a dynamic linear optimization model that can be used to examine air pollution control policies for various pollutants throughout the contiguous U.S. for the entire electric power system. The dynamic nature of IPM enables the projection of the behavior of the power system over a specified future period. The optimization logic determines the least-cost means of meeting electric generation and capacity requirements while complying with specified constraints including air pollution regulations, transmission bottlenecks, and plant-specific operational constraints. The versatility of IPM allows users to specify which constraints to exercise and populate IPM with their own datasets.

This report summarizes the analysis that ICF has performed in generating the future year electricity generating sector emission inventory by using IPM (hereafter, the analysis is referred to as the VISTAS analysis). The model assumptions and data used in this analysis are presented in Section B and the Appendix. The results are presented in Section C and the analysis limitations are presented in Section D.

Since the modeling is based on the EPA's prior analyses for which detailed public documentation is available, we have summarized only the incremental changes that were proposed by VISTAS and MRPO as part of this analysis. For detailed documentation on EPA's prior modeling using IPM, please visit www.epa.gov/airmarkets/epa-ipm.

B. Modeling Assumptions

The VISTAS analysis is based on the USEPA Modeling Applications Using IPM (V.2.1.6). As per the analytical needs of VISTAS and MRPO, the following changes were made to the underlying assumptions in the US EPA Base Case (V2.1.6) in this analysis:

i) The underlying database in the VISTAS analysis is US EPA's National Electric Energy Data System (NEEDS[1]) NODA Database, with changes based upon the comments and technical directions from VISTAS and MRPO's stakeholders. The changes focused on existing installations of NO_x, SO_2 and particulate matter (PM) controls, NO_x emission rates, SO_2 emission limits, capacity of existing units, heat rate and unit identifications of selected units in the VISTAS and MRPO regions. These changes are summarized in detail in Appendix 1.

[1] The NEEDS database contains the existing and planned/committed unit data in EPA modeling applications of IPM. NEEDS includes basic geographic, operating, air emissions, and other data on these generating units. For data sources underlying NEEDS and description of fields as well as the documentation on EPA Modeling Applications Using IPM (V.2.1.6), please visit website http://www.epa.gov/airmarkets/epa-ipm/index.html

ii) The analysis covers the period between 2007 and 2030. To make the model size and run time tractable, IPM is run for a number of selected years within the study horizon known as run years. Each run year represents several calendar years in the study horizon, and all calendar years within the study horizon are mapped to their representative run years. Although results are only reported for the run years, IPM takes into account all years in the study horizon while developing the projections. Table 1 summarizes the mapping between the run years and the calendar years. Model results are available for all run years; the last run year (2026) results are, however, not recommended to be used because of end-year effects.

Table 1: IPM Run Years

Run Year	Calendar Years
2007	2007-2007
2009	2008-2009
2010	2010-2012
2015	2013-2017
2018	2018-2018
2020	2019-2022
2026	2023-2030

iii) The Duke Power and Progress Energy SO_2 and NO_x control technology investment strategies for complying with North Carolina's Clean Smokestacks Rule were explicitly hardwired in the analysis.

iv) The CAIR rule implemented as part of this analysis is broadly consistent with the Environmental Protection Agency 40 CFR Parts 51, et al. Supplemental Proposal for the Rule to Reduce Interstate Transport of Fine Particulate Matter and Ozone (Clean Air Interstate Rule), proposed on June 10, 2004. Alabama, Arkansas, Delaware, District of Columbia, Florida, Georgia, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, New Jersey, New York, North Carolina, Ohio, Pennsylvania, South Carolina, Tennessee, Texas, Virginia, West Virginia, Wisconsin are the states affected by the CAIR SO_2 and the CAIR annual NO_x policies starting 2010. Connecticut is affected by an ozone season NO_x policy. The CAIR plants affected by the annual NO_x policy are capped at 1.6 million tons starting 2010 and 1.33 million tons starting 2015. The power plants affected by the CAIR SO_2 policy have to surrender 2 Title IV SO_2 allowances for every ton of SO_2 emitted starting 2010 and 3 Title IV SO_2 allowances for every ton of SO_2 emitted starting 2015.

C. Analysis Results

ICF ran IPM under two future scenarios – Base Case and CAIR Case. The Base Case represents the current operation of the power system under currently known laws and regulations, including those that come into force in the study horizon. The CAIR Case is the Base Case with the proposed CAIR rule superimposed. The run results were parsed at the unit level for the 2009 and 2018 run years. Appendix 2 summarizes the SO_2 and NO_x emission results on a state level. The following paragraphs discuss the results from the two runs.

1. Emissions

Table 2 presents the emissions from the Base Case and the CAIR Case in the VISTAS analysis.

Table 2: SO_2 and NO_x Emissions from the Electric Power Sector (Million Tons)

		Base Case		CAIR Case	
		2009	2018	2009	2018
CAIR Affected Region	SO_2	9.1	8.2	5.3	4.1
	NO_x*	2.9	3.0	2.8	1.4
VISTAS States	SO_2	3.44	2.96	2.28	1.42
	NO_x	1.09	1.09	1.07	0.44
Midwest RPO States	SO_2	3.05	2.61	1.51	1.33
	NO_x	0.83	0.88	0.83	0.34

*Note: Excludes Connecticut

In the CAIR region, compared with the Base Case, SO_2 emissions would be reduced by 3.8 million tons in 2009 and by 4.1 million tons in 2018. The NO_x emissions would be cut by 1.6 million tons annually in 2018, compared with the Base Case.

Total projected state-level emissions for SO_2 and NO_x for both the Base Case and the CAIR Case are included in Tables A11, A12, A13, and A14 in the Appendix.

2. Projected Costs

For the proposed CAIR region, the analysis projects the annualized incremental cost for the US to be $2.1 billion in 2009 and $3.6 billion in 2018. This represents a 3.3% increase in production cost in 2009 and a 4.6% increase in 2018 over the base case. The production cost as projected by IPM includes the capital costs of new investment decisions, fuel costs and the operation and maintenance costs of power plants. The marginal costs of emission reductions (allowance prices) in the CAIR case are shown in Table 3.

Table 3: Marginal Costs of Emission Reductions in CAIR Case (1999 $)

		2009	2018
Marginal Cost ($/ton)	SO_2	700	1,100
	NO_x	1,500	1,700

3. Projected Control Technology Retrofits

In the VISTAS analysis, the proposed CAIR policy requires the installation of an additional 67 GW of SO_2 scrubbers and an additional 35 GW of selective catalytic reduction (SCR) on existing coal capacity by 2018 (see Table 4). The pool of existing SCR's that are used during the ozone season in the NO_x SIP call region in the Base Case are allowed to operate year-round in the CAIR Case.

Table 4: Pollution Control Installations by Technology in 2018 (GW)

Technology	Base Case (Cumulative)	CAIR Case (Cumulative)
Scrubber	19	86
SCR	33	67

4. Projected Generation Mix

Table 5 shows the generation mix under the proposed CAIR policy. Coal-fired generation and natural gas-fired generation are projected to remain relatively unchanged due to the phased-in nature of the proposed CAIR.

Relative to the Base Case, in 2009, 2.7 GW of coal-fired capacity is projected to be uneconomic to maintain (approximately 1%) and 90 MW of coal-fired capacity is projected to repower to natural gas in the CAIR Case.

Table 5: National Generation Mix (BkWh's)

Generating Fuel Use	2009		2018	
	Base Case	CAIR Case	Base Case	CAIR Case
Coal	2,115	2,072	2,219	2,154
Oil/Natural Gas	821	862	1,301	1,364
Other	1,197	1,197	1,196	1,194

5. Projected Coal Production for the Electric Power Sector

Coal production for electricity generation is expected to increase with or without the proposed CAIR (Table 6). The reductions in emissions from the power sector will be met through the installation of pollution controls for SO_2 and NO_x.

Table 6: Coal Production in the Electric Power Sector (Million Tons)

Supply Area	2009		2018	
	Base Case	CAIR Case	Base Case	CAIR Case
Appalachia	327	296	297	306
Interior	182	184	189	212
West	528	545	611	550
National	1,038	1,025	1,096	1,067

6. Projected Retail Electricity Prices

National average retail electricity prices in the CAIR Case are projected to increase 2.4 percent in 2009 and 1.6 percent in 2018. Table 7 and Table 8 summarize the national and regional level retail electricity prices. These estimates were developed using the Retail Electricity Price Model.

Table 7: National Average Retail Electricity Prices (1999 Mills/kWh)

	Base Case	CAIR Case	Percent Change
2009	59.4	60.9	2.4%
2018	63.2	64.3	1.6%

Source: Retail Electricity Price Model as documented in http://www.epa.gov/clearskies/tech_sectiong.pdf

Retail electricity prices by NERC region are in Table 8

Table 8: Retail Electricity Prices by NERC Region (1999 Mills/kWh)

Power Region	Primary States Included	Base Case		CAIR Case	
		2009	2018	2009	2018
ECAR	OH,MI,IN,KY,WV,PA	51.3	56.7	53.8	58.7
ERCOT	TX	53.0	65.0	54.8	65.3
MAAC	PA,NJ,MD,DC,DE	56.9	69.3	59.5	71.6
MAIN	IL,MO,WI	51.9	60.3	53.6	61.7
MAPP	MN,IA,SD,ND,NE	54.6	49.4	54.7	49.8
NY	NY	80.0	88.1	81.8	89.6
NE	VT,NH,ME,MA,CT,RI	73.8	82.8	75.4	83.5
FRCC	FL	70.8	68.8	71.7	69.6
STV	VA,NC,SC,GA,AL,MS,TN,AR,LA	56.4	54.1	57.4	55.3
SPP	KS,OK,MO	52.8	57.4	53.7	58.0
PNW	WA,OR,ID	50.1	48.0	50.6	48.0
RM	MT,WY,CO,UT,NM,AZ,NV,ID	61.5	65.1	62.1	65.2
CALI	CA	96.8	98.2	97.6	98.3

Source: Retail Electricity Price Model as documented in http://www.epa.gov/clearskies/tech_sectiong.pdf

7. Projected Fuel Price Impacts

The impacts of the CAIR on mine mouth coal prices and natural gas prices at the Henry Hub are summarized in Table 9.

Table 9: Average Coal Mine Mouth and Henry Hub Natural Gas Prices (1999$/MMBtu)

Fuel	Base Case		CAIR Case	
	2009	2018	2009	2018
Coal	0.62	0.55	0.60	0.55
Natural Gas	2.77	2.97	2.9	2.99

D. Limitations of Analysis

VISTAS modeling using IPM is based on various economic and engineering input assumptions that are inherently uncertain, such as assumptions for future fuel prices, electricity demand growth and the cost and performance of control technologies. As configured, IPM does not take into account demand response (i.e., consumer reaction to changes in electricity prices).

E. Appendix

1. Changes made to the NEEDS NODA Database for the VISTAS Analysis

NEEDS NODA is the most recent version of the NEEDS database that EPA has made public. It contains existing and planned/committed generation unit data in the contiguous United States. In Appendix 1, the changes suggested by VISTAS and MRPO stakeholders are presented side by side against the values in the original NEEDS NODA for comparison. For description of the items changed, please visit website http://www.epa.gov/airmarkets/epa-ipm/index.html.

Table A1 Changes made to NO_x Post Combustion Control Installations on Existing Units

Plant Name	Unique ID	Post Combustion NO_x Control (NEEDS NODA)	Post Combustion NO_x Control (VISTAS)	Data Source*
ASHEVILLE	2706_B_1	SNCR	None	Progress Energy **
BARRY	3_B_1	SNCR	None	Southern Company
BARRY	3_B_2	SNCR	None	Southern Company
BARRY	3_B_3	SNCR	None	Southern Company
BARRY	3_B_4	SNCR	None	Southern Company
Barry	3_G_A1	None	SCR	Southern Company
Barry	3_G_A2ST	None	SCR	Southern Company
MT STORM	3954_B_3	None	SCR	NC-WV-SC
PLEASANTS	6004_B_1	None	SCR	NC-WV-SC
PLEASANTS	6004_B_2	None	SCR	NC-WV-SC
Victor J Daniel Jr	6073_G_3	None	SCR	Southern Company
Victor J Daniel Jr	6073_G_3CT	None	SCR	Southern Company
Victor J Daniel Jr	6073_G_4CT	None	SCR	Southern Company

* Data Source shows the names of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

** Progress Energy Compliance Plan for NC Clean Smokestacks Rule shows the existing NO_x control as AEFLGR and not SNCR.

Table A2 Changes made to NO_x Emission Rates (lbs/MMBtu)

Plant Name	Unique ID	Mode1 Rate** (VISTAS)	Mode2 Rate** (VISTAS)	Mode3 Rate** (VISTAS)	Mode4 Rate** (VISTAS)	Data Source*
GREENE COUNTY	10_B_1	0.718	0.718	0.468	0.468	Southern Company
GREENE COUNTY	10_B_2	0.416	0.416	0.380	0.380	Southern Company
Greene County	10_G_GT10	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT2	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT3	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT4	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT5	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT6	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT7	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT8	0.090	0.090	0.090	0.090	Southern Company
Greene County	10_G_GT9	0.090	0.090	0.090	0.090	Southern Company
CROSS	130_B_1	0.100	0.100	0.100	0.100	SC
CROSS	130_B_2	0.100	0.100	0.100	0.100	SC
EATON	2046_B_1	0.280	0.280	0.280	0.280	Southern Company
EATON	2046_B_2	0.280	0.280	0.280	0.280	Southern Company
EATON	2046_B_3	0.280	0.280	0.280	0.280	Southern Company
Chevron Oil	2047_G_1	0.320	0.320	0.320	0.320	Southern Company
Chevron Oil	2047_G_2	0.320	0.320	0.320	0.320	Southern Company
Chevron Oil	2047_G_3	0.320	0.320	0.320	0.320	Southern Company
Chevron Oil	2047_G_4	0.320	0.320	0.320	0.320	Southern Company
Chevron Oil	2047_G_5	0.064	0.064	0.064	0.064	Southern Company
SWEATT	2048_B_1	0.280	0.280	0.280	0.280	Southern Company
SWEATT	2048_B_2	0.280	0.280	0.280	0.280	Southern Company
Sweatt	2048_G_A	0.320	0.320	0.320	0.320	Southern Company
JACK WATSON	2049_B_1	0.280	0.280	0.280	0.280	Southern Company
JACK WATSON	2049_B_2	0.280	0.280	0.280	0.280	Southern Company
JACK WATSON	2049_B_3	0.280	0.280	0.280	0.280	Southern Company
JACK WATSON	2049_B_4	0.470	0.470	0.415	0.415	Southern Company
JACK WATSON	2049_B_5	0.590	0.590	0.415	0.415	Southern Company
Jack Watson	2049_G_A	0.880	0.880	0.880	0.880	Southern Company
E C GASTON	26_B_1	0.473	0.473	0.473	0.473	Southern Company
E C GASTON	26_B_2	0.473	0.473	0.473	0.473	Southern Company
E C GASTON	26_B_3	0.457	0.457	0.457	0.457	Southern Company
E C GASTON	26_B_4	0.457	0.457	0.457	0.457	Southern Company
E C GASTON	26_B_5	0.429	0.060	0.429	0.060	Southern Company
E C Gaston	26_G_GT4	0.880	0.880	0.880	0.880	Southern Company
ASHEVILLE	2706_B_1	0.491	0.319	0.491	0.319	-
CLIFFSIDE	2721_B_5	0.294	0.070	0.294	0.070	NC-WV-SC
BARRY	3_B_1	0.500	0.500	0.500	0.500	Southern Company
BARRY	3_B_2	0.500	0.500	0.500	0.500	Southern Company
BARRY	3_B_3	0.300	0.300	0.300	0.300	Southern Company
BARRY	3_B_4	0.290	0.290	0.290	0.290	Southern Company
BARRY	3_B_5	0.380	0.380	0.380	0.380	Southern Company
Barry	3_G_A1	0.013	0.013	0.013	0.013	Southern Company
Barry	3_G_A1CT	0.013	0.013	0.013	0.013	Southern Company
Barry	3_G_A1ST	0.013	0.013	0.013	0.013	Southern Company
Barry	3_G_A2C1	0.013	0.013	0.013	0.013	Southern Company
Barry	3_G_A2C2	0.013	0.013	0.013	0.013	Southern Company
Barry	3_G_A2ST	0.013	0.013	0.013	0.013	Southern Company
W S LEE	3264_B_1	0.393	0.393	0.250	0.250	NC-WV-SC
W S LEE	3264_B_2	0.415	0.415	0.250	0.250	NC-WV-SC
W S Lee	3264_G_4	0.320	0.320	0.320	0.320	SC
W S Lee	3264_G_5	0.320	0.320	0.320	0.320	SC
W S Lee	3264_G_6	0.320	0.320	0.320	0.320	SC
MCMEEKIN	3287_B_MC	0.350	0.350	0.350	0.350	SC

Plant Name	Unique ID	Mode1 Rate** (VISTAS)	Mode2 Rate** (VISTAS)	Mode3 Rate** (VISTAS)	Mode4 Rate** (VISTAS)	Data Source*
	M1					
MCMEEKIN	3287_B_MCM2	0.350	0.350	0.350	0.350	SC
MT STORM	3954_B_3	0.604	0.060	0.604	0.060	NC-WV-SC
JAMES H MILLER JR	6002_B_1	0.275	0.060	0.275	0.060	Southern Company
JAMES H MILLER JR	6002_B_2	0.247	0.060	0.247	0.060	Southern Company
JAMES H MILLER JR	6002_B_3	0.306	0.070	0.306	0.070	Southern Company
JAMES H MILLER JR	6002_B_4	0.275	0.070	0.275	0.070	Southern Company
PLEASANTS	6004_B_1	0.302	0.060	0.302	0.060	NC-WV-SC
PLEASANTS	6004_B_2	0.335	0.060	0.335	0.060	NC-WV-SC
WANSLEY	6052_B_1	0.405	0.070	0.405	0.070	Southern Company
WANSLEY	6052_B_2	0.390	0.070	0.390	0.070	Southern Company
Wansley	6052_G_5A	0.880	0.880	0.880	0.880	Southern Company
VICTOR J DANIEL JR.	6073_B_1	0.310	0.310	0.310	0.310	Southern Company
VICTOR J DANIEL JR.	6073_B_2	0.350	0.350	0.350	0.350	Southern Company
Victor J Daniel Jr	6073_G_3	0.013	0.013	0.013	0.013	Southern Company
Victor J Daniel Jr	6073_G_3CT	0.013	0.013	0.013	0.013	Southern Company
Victor J Daniel Jr	6073_G_3ST	0.013	0.013	0.013	0.013	Southern Company
Victor J Daniel Jr	6073_G_4	0.013	0.013	0.013	0.013	Southern Company
Victor J Daniel Jr	6073_G_4CT	0.013	0.013	0.013	0.013	Southern Company
Victor J Daniel Jr	6073_G_4ST	0.013	0.013	0.013	0.013	Southern Company
MCINTOSH	6124_B_1	0.613	0.613	0.410	0.410	Southern Company
McIntosh	6124_G_CT1	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT2	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT3	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT4	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT5	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT6	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT7	0.090	0.090	0.090	0.090	Southern Company
McIntosh	6124_G_CT8	0.090	0.090	0.090	0.090	Southern Company
WINYAH	6249_B_1	0.100	0.100	0.100	0.100	SC
WINYAH	6249_B_2	0.120	0.120	0.120	0.120	SC
WINYAH	6249_B_3	0.120	0.120	0.120	0.120	SC
WINYAH	6249_B_4	0.120	0.120	0.120	0.120	SC
SCHERER	6257_B_1	0.450	0.450	0.150	0.150	Southern Company
SCHERER	6257_B_2	0.450	0.450	0.150	0.150	Southern Company
SCHERER	6257_B_3	0.300	0.300	0.150	0.150	Southern Company
SCHERER	6257_B_4	0.300	0.300	0.150	0.150	Southern Company
Wilson	6258_G_5A	0.880	0.880	0.880	0.880	Southern Company
Wilson	6258_G_5B	0.880	0.880	0.880	0.880	Southern Company
Wilson	6258_G_5C	0.880	0.880	0.880	0.880	Southern Company
Wilson	6258_G_5D	0.880	0.880	0.880	0.880	Southern Company
Wilson	6258_G_5E	0.880	0.880	0.880	0.880	Southern Company
Wilson	6258_G_5F	0.880	0.880	0.880	0.880	Southern Company
Wilson	6258_G_IC1	0.880	0.880	0.880	0.880	Southern Company
CRIST	641_B_2	0.280	0.280	0.280	0.280	Southern Company
CRIST	641_B_3	0.280	0.280	0.280	0.280	Southern Company
CRIST	641_B_4	0.400	0.400	0.240	0.240	Southern Company

Plant Name	Unique ID	Mode1 Rate** (VISTAS)	Mode2 Rate** (VISTAS)	Mode3 Rate** (VISTAS)	Mode4 Rate** (VISTAS)	Data Source*
CRIST	641_B_5	0.400	0.400	0.240	0.240	Southern Company
CRIST	641_B_7	0.482	0.060	0.482	0.060	Southern Company
SCHOLZ	642_B_1	0.540	0.540	0.320	0.320	Southern Company
SCHOLZ	642_B_2	0.570	0.570	0.320	0.320	Southern Company
SMITH	643_B_1	0.490	0.490	0.240	0.240	Southern Company
SMITH	643_B_2	0.410	0.410	0.410	0.410	Southern Company
Lansing Smith	643_G_CT1	0.880	0.880	0.880	0.880	Southern Company
GADSDEN	7_B_1	0.544	0.544	0.544	0.544	Southern Company
GADSDEN	7_B_2	0.544	0.544	0.544	0.544	Southern Company
Atkinson	700_G_5A	0.320	0.320	0.320	0.320	Southern Company
Atkinson	700_G_5B	0.320	0.320	0.320	0.320	Southern Company
BOWEN	703_B_1BLR	0.405	0.070	0.405	0.070	Southern Company
BOWEN	703_B_2BLR	0.405	0.070	0.405	0.070	Southern Company
BOWEN	703_B_3BLR	0.409	0.070	0.409	0.070	Southern Company
BOWEN	703_B_4BLR	0.419	0.070	0.419	0.070	Southern Company
Bowen	703_G_6	0.880	0.880	0.880	0.880	Southern Company
HAMMOND	708_B_1	0.800	0.800	0.410	0.410	Southern Company
HAMMOND	708_B_2	0.800	0.800	0.410	0.410	Southern Company
HAMMOND	708_B_3	0.800	0.800	0.410	0.410	Southern Company
HAMMOND	708_B_4	0.404	0.070	0.404	0.070	Southern Company
HARLLEE BRANCH	709_B_1	0.800	0.800	0.519	0.519	Southern Company
HARLLEE BRANCH	709_B_2	0.800	0.800	0.374	0.374	Southern Company
HARLLEE BRANCH	709_B_3	0.800	0.800	0.381	0.381	Southern Company
HARLLEE BRANCH	709_B_4	0.800	0.800	0.381	0.381	Southern Company
JACK MCDONOUGH	710_B_MB1	0.450	0.450	0.230	0.230	Southern Company
JACK MCDONOUGH	710_B_MB2	0.450	0.450	0.230	0.230	Southern Company
Jack McDonough	710_G_3A	0.320	0.320	0.320	0.320	Southern Company
Jack McDonough	710_G_3B	0.320	0.320	0.320	0.320	Southern Company
MCMANUS	715_B_1	0.310	0.310	0.310	0.310	Southern Company
MCMANUS	715_B_2	0.310	0.310	0.310	0.310	Southern Company
McManus	715_G_3A	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_3B	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_3C	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_4A	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_4B	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_4C	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_4D	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_4E	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_4F	0.880	0.880	0.880	0.880	Southern Company
McManus	715_G_IC1	3.200	3.200	3.200	3.200	Southern Company
MITCHELL	727_B_3	0.625	0.625	0.625	0.625	Southern Company
Mitchell	727_G_4A	0.880	0.880	0.880	0.880	Southern Company
Mitchell	727_G_4B	0.880	0.880	0.880	0.880	Southern Company
Mitchell	727_G_4C	0.880	0.880	0.880	0.880	Southern Company

* Data Source shows the names of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories. “SC” reflects the spreadsheet CopyofSCIPMdata.xls. Rate changes include VISTAS interpretation of stakeholder submitted data.

**

Mode 1 Rate (Uncontrolled Base Rate) – This emission rate reflects current configuration of combustion controls. If a post combustion NO_x control such as a SCR or a SNCR exists, it is assumed that it is not operating.

Mode 2 Rate (Controlled Base Rate) – This emission rate reflects current configuration of combustion controls. If a post combustion NO_x control such as a SCR or a SNCR exists, it is assumed that it is operating.

Mode 3 Rate (Uncontrolled Policy Rate) – This emission rate reflects a state of the art configuration of combustion controls. If a post combustion NO_x control such as a SCR or a SNCR exists, it is assumed that it is not operating.
Mode 4 Rate (Controlled Policy Rate) – This emission rate reflects a state of the art configuration of combustion controls. If a post combustion NO_x control such as a SCR or a SNCR exists, it is assumed that it is operating.

For more details on the development of these rates please refer to
http://www.epa.gov/airmarkets/epa-ipm/section3powsysop.pdf

Table A3 Changes made to SO_2 Scrubber Installations on Existing Units

Plant Name	Unique ID	Wet/DryScrubber (NEEDS NODA)	Wet/DryScrubber (VISTAS)	Data Source*
NORTH BRANCH POWER STATION	7537_B_1A	Dry Scrubber	-	NC-WV-SC
NORTH BRANCH POWER STATION	7537_B_1B	Dry Scrubber	-	NC-WV-SC
Morgantown Energy Facility	10743_G_GEN1	Dry Scrubber	-	NC-WV-SC

* Data Source shows the name of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

Table A4 Changes made to SO_2 Emission Rate Limits (lbs/MMBtu)

Plant Name	Unique ID	SO_2 Rate (NEEDS NODA)	SO_2 Rate (VISTAS)	Data Source*
GREENE COUNTY	10_B_1	4.000	1.197	Southern Company
GREENE COUNTY	10_B_2	4.000	1.197	Southern Company
EATON	2046_B_1	4.800	0.001	Southern Company
EATON	2046_B_2	4.800	0.001	Southern Company
EATON	2046_B_3	4.800	0.001	Southern Company
SWEATT	2048_B_1	4.800	0.001	Southern Company
SWEATT	2048_B_2	4.800	0.001	Southern Company
JACK WATSON	2049_B_1	4.800	0.001	Southern Company
JACK WATSON	2049_B_2	4.800	0.001	Southern Company
JACK WATSON	2049_B_3	4.800	0.001	Southern Company
JACK WATSON	2049_B_4	4.800	0.885	Southern Company
JACK WATSON	2049_B_5	4.800	0.885	Southern Company
E C GASTON	26_B_1	3.800	1.667	Southern Company
E C GASTON	26_B_2	3.800	1.667	Southern Company
E C GASTON	26_B_3	3.800	1.667	Southern Company
E C GASTON	26_B_4	3.800	1.667	Southern Company
E C GASTON	26_B_5	3.800	1.667	Southern Company
BUCK	2720_B_5	2.300	1.630	NC-WV-SC
BUCK	2720_B_6	2.300	1.630	NC-WV-SC
BUCK	2720_B_7	2.300	1.630	NC-WV-SC
BUCK	2720_B_8	2.300	1.630	NC-WV-SC
BUCK	2720_B_9	2.300	1.630	NC-WV-SC
CLIFFSIDE	2721_B_1	2.300	2.200	NC-WV-SC
CLIFFSIDE	2721_B_2	2.300	2.200	NC-WV-SC
CLIFFSIDE	2721_B_3	2.300	2.200	NC-WV-SC
CLIFFSIDE	2721_B_4	2.300	2.200	NC-WV-SC
CLIFFSIDE	2721_B_5	2.300	2.200	NC-WV-SC
DAN RIVER	2723_B_1	2.300	1.810	NC-WV-SC
DAN RIVER	2723_B_2	2.300	1.810	NC-WV-SC
DAN RIVER	2723_B_3	2.300	1.810	NC-WV-SC
BARRY	3_B_1	1.800	1.197	Southern Company
BARRY	3_B_2	1.800	1.197	Southern Company
BARRY	3_B_3	1.800	1.197	Southern Company
BARRY	3_B_4	1.800	1.197	Southern Company
BARRY	3_B_5	1.800	1.197	Southern Company
JAMES H MILLER JR	6002_B_1	1.800	0.795	Southern Company
JAMES H MILLER JR	6002_B_2	1.800	0.795	Southern Company
JAMES H MILLER JR	6002_B_3	1.800	0.795	Southern Company
JAMES H MILLER JR	6002_B_4	1.800	0.795	Southern Company
VICTOR J DANIEL JR.	6073_B_1	4.800	0.885	Southern Company
VICTOR J DANIEL JR.	6073_B_2	4.800	0.885	Southern Company
SCHERER	6257_B_1	1.200	0.796	Southern Company
SCHERER	6257_B_2	1.200	0.796	Southern Company
SCHERER	6257_B_3	1.200	0.796	Southern Company
SCHERER	6257_B_4	1.200	0.796	Southern Company
CRIST	641_B_2	0.740	0.001	Southern Company

Plant Name	Unique ID	SO_2 Rate (NEEDS NODA)	SO_2 Rate (VISTAS)	Data Source*
CRIST	641_B_3	0.740	0.001	Southern Company
CRIST	641_B_4	5.900	1.197	Southern Company
CRIST	641_B_5	5.900	1.197	Southern Company
CRIST	641_B_6	5.900	1.197	Southern Company
CRIST	641_B_7	5.900	1.197	Southern Company
SCHOLZ	642_B_1	6.170	1.200	Southern Company
SCHOLZ	642_B_2	6.170	1.200	Southern Company
SMITH	643_B_1	6.170	1.197	Southern Company
SMITH	643_B_2	6.170	1.197	Southern Company
GADSDEN	7_B_1	4.000	2.500	Southern Company
GADSDEN	7_B_2	4.000	2.500	Southern Company
BOWEN	703_B_1BLR	4.580	1.667	Southern Company
HAMMOND	708_B_1	4.580	1.667	Southern Company
HAMMOND	708_B_2	4.580	1.667	Southern Company
HAMMOND	708_B_3	4.580	1.667	Southern Company
HAMMOND	708_B_4	4.580	1.667	Southern Company
HARLLEE BRANCH	709_B_1	4.580	1.667	Southern Company
HARLLEE BRANCH	709_B_2	4.580	1.667	Southern Company
HARLLEE BRANCH	709_B_3	4.580	1.667	Southern Company
HARLLEE BRANCH	709_B_4	4.580	1.667	Southern Company
JACK MCDONOUGH	710_B_MB1	4.580	1.667	Southern Company
JACK MCDONOUGH	710_B_MB2	4.580	1.667	Southern Company
MCMANUS	715_B_1	3.159	2.620	Southern Company
MCMANUS	715_B_2	3.159	2.620	Southern Company
MITCHELL	727_B_3	4.580	2.500	Southern Company
YATES	728_B_Y2BR	4.580	1.667	Southern Company
YATES	728_B_Y3BR	4.580	1.667	Southern Company
YATES	728_B_Y4BR	4.580	1.667	Southern Company
YATES	728_B_Y5BR	4.580	1.667	Southern Company
KRAFT	733_B_1	4.580	1.270	Southern Company
KRAFT	733_B_2	4.580	1.270	Southern Company
KRAFT	733_B_3	4.580	1.270	Southern Company
KRAFT	733_B_4	0.800	0.001	Southern Company
RIVERSIDE	734_B_11	2.632	0.001	Southern Company
RIVERSIDE	734_B_12	3.159	0.001	Southern Company
RIVERSIDE	734_B_4	2.632	0.001	Southern Company
RIVERSIDE	734_B_5	2.632	0.001	Southern Company
RIVERSIDE	734_B_6	2.632	0.001	Southern Company
GORGAS	8_B_10	4.000	1.667	Southern Company
GORGAS	8_B_6	4.000	2.500	Southern Company
GORGAS	8_B_7	4.000	2.500	Southern Company
GORGAS	8_B_8	4.000	1.667	Southern Company
GORGAS	8_B_9	4.000	1.667	Southern Company

- Data Source shows the names of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

Table A5 Changes made to Particulate Matter (PM) Control Installations on Existing Units

Plant Name	Unique ID	PM Control (NEEDS NODA)	PM Control (VISTAS)	Data Sources *
G G ALLEN	2718_B_3	Hot-side ESP	Cold-side ESP	NC-WV-SC
G G ALLEN	2718_B_5	Hot-side ESP	Cold-side ESP	NC-WV-SC
WESTON	4078_B_3	Hot-side ESP + Fabric Filter	Fabric Filter	Wisconsin

* Data Sources shows the name of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

Table A6 Changes made to Summer Net Dependable Capacity (MW)

Plant Name	Unique ID	Capacity (NEEDS NODA)	Capacity (VISTAS)	Data Source*
VACA_SC_Combined Cycle	077_C_077	1317	807	SC
CRIST	641_B_1	24	0 **	Southern Company
Lansing Smith	A274_G_A274	500	530	Southern Company
Atkinson	700_G_5A	32	15.3	Southern Company
Atkinson	700_G_5B	32	15.3	Southern Company
Dahlberg	7709_G_10	75	80	Southern Company
Dahlberg	7709_G_9	75	80	Southern Company
FRANKLIN	A7840_G_A331	570	630	Southern Company
Mill Creek	A294_G_A294	320	326.8	NC-WV-SC
Mill Creek	A295_G_A295	240	245.1	NC-WV-SC
Mill Creek	A296_G_A296	80	81.7	NC-WV-SC
SCE&G Hardeeville	3286_C_2		170	SC
SCE&G Hardeeville	3286_C_3		170	SC
SCE&G Hardeeville	3286_C_4		170	SC
Cross 3	130_C_3		660	SC

* Data Source shows the name of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories. “SC” reflects the spreadsheet CopyofSCIPMdata.xls.

** Zero capacity denotes that the unit was retired in 2002.

Table A7 Changes made to Heat Rate (Btu/kWh)

Plant Name	Unique ID	ORIS Code	BGCI	Unit ID	Heat Rate (NEEDS NODA)	Heat Rate (VISTAS)	Data Source*
ALLEN S KING	1915_B_1	1915	B	1	8879	9229	Minnesota

* Data Source shows the name of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

Table A8 Changes made to Unit ID

Plant Name	Unique ID	ORIS Code	BGCI	Unit ID (NEEDS NODA)	Unit ID (VISTAS)	Data Source*
Talbot County Energy	A397_G_A397	7916	G	397	1	Oglethorpe
Talbot County Energy	A398_G_A398	7916	G	398	2	Oglethorpe
Talbot County Energy	A399_G_A399	7916	G	399	3-4	Oglethorpe
Talbot County Energy	A400_G_A400	7916	G	400	5-6	Oglethorpe
Mill Creek	A294_G_A294	7981	G	294	1-4	NC-WV-SC
Mill Creek	A295_G_A295	7981	G	295	5-7	NC-WV-SC
Mill Creek	A296_G_A296	7981	G	296	8	NC-WV-SC

* Data Source shows the name of sheets in NEEDS-NODA-VISTAS-Aug18Rev.xls, provided by Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

Table A9 Duke and Progress Energy SO_2 Control Plan for North Carolina Clean Smokestacks Rule

Unit	Technology	Operation Date	Company
Asheville 1	Scrubber	2005	Progress Energy
Asheville 2	Scrubber	2006	Progress Energy
Cape Fear 5	Scrubber	2012	Progress Energy
Cape Fear 6	Scrubber	2011	Progress Energy
Mayo 1	Scrubber	2008	Progress Energy
Roxboro 1	Scrubber	2009	Progress Energy
Roxboro 2	Scrubber	2007	Progress Energy
Roxboro 3	Scrubber	2007	Progress Energy
Roxboro 4	Scrubber	2007	Progress Energy
Sutton 3	Scrubber	2012	Progress Energy
Allen 1	Scrubber	2011	Duke Power
Allen 2	Scrubber	2011	Duke Power
Allen 3	Scrubber	2011	Duke Power
Allen 4	Scrubber	2012	Duke Power
Allen 5	Scrubber	2012	Duke Power
Belews Creek 1	Scrubber	2008	Duke Power
Belews Creek 2	Scrubber	2008	Duke Power
Cliffside 5	Scrubber	2009	Duke Power
Marshall 1	Scrubber	2007	Duke Power
Marshall 2	Scrubber	2007	Duke Power
Marshall 3	Scrubber	2006	Duke Power
Marshall 4	Scrubber	2006	Duke Power

Source: Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

Table A10 Duke and Progress Energy NO_x Control Plan for North Carolina Clean Smokestacks Rule

Unit	Technology	Operation Date	Company
Asheville 1	SCR	2009	Progress Energy
Lee 2	ROFA	2007	Progress Energy
Lee 3	SCR	2010	Progress Energy
Sutton 2	ROFA	2006	Progress Energy
Allen 1	SNCR	2003	Duke Power
Allen 2	SNCR	2007	Duke Power
Allen 3	SNCR	2005	Duke Power
Allen 4	SNCR	2006	Duke Power
Allen 5	SNCR	2008	Duke Power
Belews Creek 1	SCR	2003	Duke Power
Belews Creek 2	SCR	2004	Duke Power
Buck 3	SNCR	2009	Duke Power
Buck 4	SNCR	2008	Duke Power
Buck 5	SNCR	2006	Duke Power
Buck 6	SNCR	2007	Duke Power
Cliffside 1	SNCR	2009	Duke Power
Cliffside 2	SNCR	2009	Duke Power
Cliffside 3	SNCR	2008	Duke Power
Cliffside 4	SNCR	2008	Duke Power
Cliffside 5	SCR	2002	Duke Power
Dan River 1	SNCR	2009	Duke Power
Dan River 2	SNCR	2009	Duke Power
Dan River 3	SNCR	2007	Duke Power
Marshall 1	SNCR	2007	Duke Power
Marshall 2	SNCR	2006	Duke Power
Marshall 3	SNCR	2005	Duke Power
Marshall 4	SNCR	2008	Duke Power
Riverbend 4	SNCR	2007	Duke Power
Riverbend 5	SNCR	2008	Duke Power
Riverbend 6	SNCR	2008	Duke Power
Riverbend 7	SNCR	2007	Duke Power

Source: Gregory Stella, VISTAS Technical Advisor for Emissions Inventories.

2. Emission Results

Tables A11, A12, A13 and A14 present the Base Case and the CAIR Case NO_x and SO_2 emissions by state and season in 2009 and 2018 run years.

Table A11 State Level Base Case NO_x Emissions by Season (Thousand Tons)

NO_x Emission (Base Case)	Winter		Summer	
	2009	2018	2009	2018
CAIR Affected States				
Alabama	97.93	100.12	34.06	34.89
Arkansas	23.92	24.68	19.73	19.96
District Of Columbia	0.00	0.03	0.00	0.05
Delaware	6.09	7.30	2.78	3.42
Florida	80.78	86.48	67.84	72.61
Georgia	92.95	94.65	38.95	34.29
Iowa	39.67	47.64	30.90	36.59
Illinois	101.87	119.29	27.74	37.91
Indiana	176.21	183.22	61.12	61.74
Kansas	46.35	50.19	36.58	39.32
Kentucky	131.21	132.43	47.76	49.80
Louisiana	27.55	28.46	22.92	23.26
Massachusetts	9.80	11.69	5.64	8.74
Maryland	48.93	50.40	9.07	9.88
Michigan	80.77	85.49	35.64	34.26
Minnesota	39.60	44.65	30.21	34.14
Missouri	84.20	86.01	33.32	30.67
Mississippi	20.98	21.97	17.68	18.21
North Carolina	40.99	39.94	25.74	24.73
New Jersey	10.93	13.57	4.76	5.79
New York	31.75	30.74	18.00	18.79
Ohio	221.12	234.60	50.99	47.99
Pennsylvania	139.63	144.99	58.57	54.52
South Carolina	33.44	35.53	17.06	19.70
Tennessee	88.26	88.30	18.75	24.15
Texas	91.74	91.77	92.76	102.30
Virginia	44.06	37.63	21.15	19.35
Wisconsin	44.08	44.81	35.52	35.59
West Virginia	146.12	147.16	27.86	23.37
Total	2,000.92	2,083.74	893.12	926.01
Non CAIR States				
Arizona	43.51	45.10	35.05	35.71
California	21.46	18.71	13.13	12.91
Colorado	38.20	39.43	30.04	30.90
Connecticut	3.56	4.49	2.63	2.81
Idaho	0.85	0.76	0.65	0.34
Maine	1.03	1.04	0.81	0.82
Montana	21.40	21.42	16.92	17.01
North Dakota	39.97	39.97	31.67	31.67
Nebraska	27.26	27.49	21.75	21.96
New Hampshire	1.33	1.65	0.74	1.18
New Mexico	40.80	40.90	32.70	32.97
Nevada	18.94	21.12	10.94	16.55
Oklahoma	41.56	41.86	36.02	38.41

NO_x Emission (Base Case)	Winter		Summer	
	2009	2018	2009	2018
Oregon	7.54	7.79	5.89	6.07
Rhode Island	0.29	0.32	0.23	0.30
South Dakota	8.10	8.11	6.44	6.44
Utah	33.87	33.83	26.88	26.43
Vermont	0.01	0.01	0.01	0.02
Washington	16.48	14.94	12.19	11.79
Wyoming	45.24	45.24	35.93	35.93
Total	411.39	414.19	320.62	330.23
National Total	2,412.31	2,497.93	1,213.74	1,256.23

Table A12 State Level Base Case SO_2 Emissions by Season (Thousand Tons)

SO_2 Emission (Base Case)	Winter		Summer	
	2009	2018	2009	2018
CAIR Affected States				
Alabama	279.95	209.76	185.64	165.55
Arkansas	45.95	45.95	36.49	36.49
District Of Columbia	0.00	0.00	0.00	0.00
Delaware	22.94	26.88	15.11	17.45
Florida	122.20	120.04	97.19	95.45
Georgia	328.97	310.23	253.11	243.79
Iowa	86.91	101.85	66.32	78.32
Illinois	215.50	242.21	130.41	177.13
Indiana	434.76	300.46	291.49	228.01
Kansas	45.06	47.83	36.59	37.99
Kentucky	279.82	241.21	203.42	188.21
Louisiana	55.29	55.29	43.92	43.92
Massachusetts	9.55	10.21	2.21	6.86
Maryland	179.99	187.19	129.98	143.59
Michigan	219.48	227.46	160.86	177.17
Minnesota	52.19	53.20	39.47	39.43
Missouri	153.41	158.24	110.96	119.58
Mississippi	47.72	47.72	37.90	37.90
North Carolina	109.66	80.15	72.83	53.68
New Jersey	31.74	19.49	22.99	14.08
New York	100.81	89.14	48.13	53.50
Ohio	860.12	647.74	584.09	460.62
Pennsylvania	525.90	503.94	359.82	361.58
South Carolina	93.19	99.82	70.44	79.21
Tennessee	274.69	184.91	161.76	138.75
Texas	221.74	231.04	184.26	188.83
Virginia	133.86	103.85	87.09	77.75
Wisconsin	87.01	85.93	69.31	67.53
West Virginia	349.02	274.96	249.54	208.00
Total	5,367.45	4,706.71	3,751.31	3,540.37
Non CAIR States				
Arizona	33.81	28.38	26.85	22.54
California	3.64	3.64	2.88	2.88
Colorado	51.13	51.13	40.59	40.61
Connecticut	3.62	3.62	2.85	2.85
Idaho	0.03	0.03	0.02	0.02
Maine	3.01	3.01	2.42	2.42
Montana	11.32	12.90	8.95	10.28
North Dakota	74.59	74.54	58.98	58.94
Nebraska	39.52	39.92	31.48	31.63
New Hampshire	5.20	4.62	2.26	2.98
New Mexico	29.49	29.49	23.42	23.42
Nevada	12.09	13.32	6.14	10.25
Oklahoma	65.56	65.56	52.08	52.08

SO_2 Emission (Base Case)	Winter		Summer	
	2009	2018	2009	2018
Oregon	5.67	5.67	4.50	4.50
Rhode Island	0.00	0.00	0.00	0.00
South Dakota	6.74	6.74	5.35	5.35
Utah	29.65	20.86	23.43	15.04
Vermont	0.02	0.02	0.01	0.01
Washington	6.63	6.65	5.15	5.17
Wyoming	41.73	28.93	33.14	22.98
Total	423.46	399.05	330.53	313.96
National Total	5,790.90	5,105.76	4,081.84	3,854.33

Table A13 State Level CAIR Case NO_x Emissions by Season (Thousand Tons)

NO_x Emission (CAIR Case)	Winter		Summer	
	2009	2018	2009	2018
CAIR Affected States				
Alabama	96.01	21.06	36.32	18.89
Arkansas	24.01	17.81	19.73	14.41
District Of Columbia	0.00	0.05	0.02	0.04
Delaware	4.92	3.86	0.92	3.01
Florida	80.05	30.71	67.84	28.83
Georgia	88.13	33.33	31.30	32.22
Iowa	39.36	23.69	30.64	16.83
Illinois	108.01	38.49	33.62	30.78
Indiana	174.47	49.88	64.17	37.28
Kansas	46.51	17.41	36.48	14.84
Kentucky	129.41	36.28	47.90	28.43
Louisiana	27.80	16.91	22.92	14.01
Massachusetts	10.03	8.38	6.43	6.23
Maryland	46.83	7.76	11.25	6.58
Michigan	80.25	39.64	35.94	30.88
Minnesota	40.35	21.80	30.79	17.02
Missouri	82.31	50.25	36.39	27.68
Mississippi	20.98	5.68	17.78	5.11
North Carolina	40.69	33.56	26.50	26.49
New Jersey	11.08	6.73	4.27	5.64
New York	25.18	22.18	19.25	17.99
Ohio	214.10	47.83	43.53	34.32
Pennsylvania	129.93	42.08	54.03	33.21
South Carolina	34.01	20.39	16.20	16.00
Tennessee	87.13	15.77	17.44	16.68
Texas	91.58	82.32	92.49	90.41
Virginia	39.54	23.15	23.53	17.15
Wisconsin	41.88	21.25	33.52	16.56
West Virginia	145.07	24.52	29.50	17.70
Total	1,959.60	762.79	890.73	625.24
Non CAIR States				
Arizona	43.50	45.11	35.04	35.68
California	20.40	18.52	13.00	12.91
Colorado	38.14	39.55	30.05	30.88
Connecticut	3.90	5.06	3.00	3.50
Idaho	0.85	0.78	0.65	0.34
Maine	1.03	1.08	0.76	0.85
Montana	21.40	21.42	16.98	17.01
North Dakota	38.73	39.97	29.27	31.76
Nebraska	27.43	27.52	21.83	22.08
New Hampshire	0.97	1.71	0.75	1.35
New Mexico	40.80	40.92	32.70	32.98
Nevada	19.96	22.36	11.06	17.60
Oklahoma	41.64	42.42	36.06	40.57

NO_x Emission (CAIR Case)	Winter		Summer	
	2009	2018	2009	2018
Oregon	7.54	7.79	5.89	6.07
Rhode Island	0.29	0.34	0.21	0.30
South Dakota	8.10	8.11	6.44	6.45
Utah	33.87	33.83	26.86	26.43
Vermont	0.01	0.02	0.01	0.02
Washington	16.48	14.94	12.19	11.78
Wyoming	45.24	45.24	35.93	35.93
Total	410.29	416.69	318.68	334.51
National Total	2,369.89	1,179.48	1,209.41	959.75

Table A14 State Level CAIR Case SO_2 Emissions by Season (Thousand Tons)

SO_2 Emission (CAIR Case)	Winter		Summer	
	2009	2018	2009	2018
CAIR Affected States				
Alabama	190.85	125.61	124.00	100.91
Arkansas	45.95	45.95	36.49	36.49
District Of Columbia	0.00	0.00	0.00	0.00
Delaware	16.78	9.84	5.14	7.09
Florida	110.87	70.51	89.28	56.09
Georgia	244.73	117.05	149.70	104.56
Iowa	89.51	97.92	68.86	71.77
Illinois	141.81	149.61	93.99	113.51
Indiana	200.81	182.52	140.39	139.08
Kansas	44.63	40.60	35.76	32.84
Kentucky	197.05	127.58	145.63	98.20
Louisiana	34.59	18.80	27.47	14.93
Massachusetts	10.70	9.48	2.93	6.73
Maryland	41.64	14.40	25.23	10.01
Michigan	216.30	221.63	157.75	174.22
Minnesota	45.46	47.48	35.48	35.41
Missouri	148.86	151.22	110.16	118.11
Mississippi	47.72	28.96	37.90	23.00
North Carolina	80.70	41.41	51.49	36.93
New Jersey	19.09	11.35	15.17	8.65
New York	57.16	26.70	37.60	20.71
Ohio	259.36	122.94	144.93	88.31
Pennsylvania	128.67	74.04	77.16	57.49
South Carolina	85.48	85.74	58.09	66.81
Tennessee	168.50	53.32	111.44	50.29
Texas	216.76	195.36	178.90	159.08
Virginia	89.83	66.57	51.09	49.68
Wisconsin	83.88	78.63	66.32	62.03
West Virginia	154.15	64.86	92.70	47.07
Total	3,171.82	2,280.08	2,171.02	1,789.98
Non CAIR States				
Arizona	33.81	28.38	26.85	22.54
California	3.64	3.64	2.88	2.88
Colorado	50.79	51.16	40.28	40.61
Connecticut	3.62	3.62	2.58	2.85
Idaho	0.03	0.03	0.02	0.02
Maine	3.01	3.01	2.10	2.42
Montana	11.32	13.00	9.01	10.33
North Dakota	71.08	74.54	54.63	59.20
Nebraska	39.82	39.92	31.63	31.70
New Hampshire	0.92	4.47	0.70	3.52
New Mexico	29.49	29.49	23.42	23.42
Nevada	12.90	14.33	6.23	11.09
Oklahoma	65.56	65.56	52.08	52.08

SO_2 Emission (CAIR Case)	Winter		Summer	
	2009	2018	2009	2018
Oregon	5.67	5.67	4.50	4.50
Rhode Island	0.00	0.00	0.00	0.00
South Dakota	6.74	6.74	5.35	5.35
Utah	29.65	20.86	23.35	15.04
Vermont	0.02	0.02	0.01	0.01
Washington	6.11	6.65	4.80	5.17
Wyoming	39.68	28.93	31.52	22.98
Total	413.87	400.02	321.96	315.72
National Total	3,585.68	2,680.10	2,492.97	2,105.71

3. Generation Results

Tables A15 and A16 present the generation in the Base Case and the CAIR Case by state and season in 2009 and 2018 run years.

Table A15 State Level Base Case Generation by Season (GWh)

Base Case Generation	Winter		Summer	
	2009	2018	2009	2018
CAIR Affected States				
Alabama	89,306	107,340	71,273	89,828
Arkansas	27,458	35,937	27,331	29,377
District Of Columbia	-	70	-	113
Delaware	3,688	4,873	2,754	4,030
Florida	103,348	140,092	91,525	117,000
Georgia	93,099	103,667	73,028	86,929
Iowa	26,718	32,128	20,016	23,757
Illinois	111,860	120,671	79,329	91,331
Indiana	78,544	86,210	57,036	65,667
Kansas	26,507	27,819	21,332	22,583
Kentucky	61,480	62,605	46,396	48,451
Louisiana	35,891	48,346	35,855	38,090
Massachusetts	31,527	37,098	22,173	27,421
Maryland	31,487	33,118	22,747	26,002
Michigan	61,566	75,353	45,410	54,723
Minnesota	27,529	31,431	21,104	23,976
Missouri	51,304	54,766	38,644	42,737
Mississippi	20,631	32,250	24,165	29,593
North Carolina	72,173	77,731	54,210	58,315
New Jersey	31,669	38,312	26,922	29,698
New York	86,175	90,403	66,311	69,245
Ohio	98,345	111,448	69,610	80,018
Pennsylvania	129,591	140,974	93,686	101,509
South Carolina	57,536	66,909	47,731	54,364
Tennessee	57,630	59,073	40,526	43,453
Texas	175,132	192,596	176,889	210,649
Virginia	44,517	55,805	34,038	42,987
Wisconsin	37,353	40,072	29,408	31,217
West Virginia	60,407	61,029	45,922	47,604
Total	1,732,468	1,968,124	1,385,371	1,590,666
Non CAIR States				
Arizona	68,796	84,020	58,556	66,427
California	153,862	193,482	115,891	148,755
Colorado	24,277	29,820	17,665	22,200
Connecticut	18,145	20,347	12,832	13,661
Idaho	6,535	6,859	5,123	4,814
Maine	4,510	4,554	3,259	3,284
Montana	14,651	15,017	11,972	12,277
North Dakota	15,999	15,999	12,683	12,688
Nebraska	17,523	17,985	14,926	15,717
New Hampshire	19,201	18,995	14,611	14,436
New Mexico	16,508	17,492	13,485	14,417
Nevada	21,432	24,996	15,590	20,097
Oklahoma	42,002	45,145	36,058	40,794

Base Case Generation	Winter		Summer	
	2009	2018	2009	2018
Oregon	34,193	37,710	25,959	28,498
Rhode Island	2,822	3,045	1,865	2,474
South Dakota	5,103	5,116	4,200	4,210
Utah	18,558	18,525	14,807	14,561
Vermont	3,328	3,284	2,102	1,985
Washington	61,086	64,342	43,874	47,400
Wyoming	24,650	24,627	19,574	19,555
Total	573,182	651,360	445,030	508,249
National Total	2,305,650	2,619,484	1,830,401	2,098,915

Table A16 State Level CAIR Case Generation by Season (GWh)

CAIR Case Generation	Winter		Summer	
	2009	2018	2009	2018
CAIR Affected States				
Alabama	94,570	114,813	74,254	91,185
Arkansas	28,520	38,336	27,342	30,538
District Of Columbia	-	164	27	140
Delaware	4,109	4,888	1,395	3,816
Florida	103,047	134,673	91,525	114,079
Georgia	90,975	106,074	68,713	87,944
Iowa	26,654	32,155	20,160	22,069
Illinois	113,576	118,442	83,009	91,406
Indiana	77,812	85,811	59,219	64,105
Kansas	26,553	25,090	21,262	21,729
Kentucky	60,623	61,425	45,949	47,837
Louisiana	39,178	47,708	35,792	37,296
Massachusetts	32,086	35,865	22,315	26,056
Maryland	30,432	33,919	22,226	26,140
Michigan	61,409	77,361	45,712	55,464
Minnesota	28,657	31,549	22,190	24,725
Missouri	50,909	54,005	38,878	43,636
Mississippi	20,654	38,386	26,053	31,804
North Carolina	72,011	76,972	54,051	59,626
New Jersey	32,728	37,732	26,430	30,620
New York	86,621	90,452	67,306	70,406
Ohio	94,457	109,773	66,893	80,432
Pennsylvania	125,813	135,339	93,940	100,257
South Carolina	59,092	67,948	47,929	54,154
Tennessee	57,255	55,011	40,017	42,531
Texas	174,956	188,405	176,614	205,557
Virginia	42,300	55,560	34,556	41,982
Wisconsin	37,205	41,005	28,850	31,286
West Virginia	59,826	59,948	43,305	46,823
Total	1,732,029	1,958,806	1,385,910	1,583,642
Non CAIR States				
Arizona	68,764	84,088	58,527	66,182
California	153,862	193,060	115,905	148,764
Colorado	23,897	29,789	17,750	22,086
Connecticut	17,851	20,146	12,783	13,817
Idaho	6,535	6,907	5,123	4,809
Maine	4,510	5,032	3,213	3,605
Montana	14,651	15,018	11,996	12,275
North Dakota	15,380	15,999	11,862	12,738
Nebraska	17,566	18,061	14,947	15,816
New Hampshire	18,921	19,856	14,663	15,201
New Mexico	16,514	17,636	13,485	14,519
Nevada	21,896	25,564	15,641	20,582
Oklahoma	42,459	50,227	36,383	45,539

CAIR Case Generation	Winter		Summer	
	2009	2018	2009	2018
Oregon	34,193	37,678	25,959	28,474
Rhode Island	2,822	3,032	1,651	2,410
South Dakota	5,103	5,116	4,200	4,220
Utah	18,558	18,525	14,796	14,561
Vermont	3,328	3,446	2,102	2,096
Washington	61,086	64,281	43,874	47,356
Wyoming	24,650	24,627	19,574	19,555
Total	572,547	658,087	444,434	514,605
National Total	2,304,577	2,616,893	1,830,343	2,098,247

4. Cost Results

Tables A17, A18, A19 and A20 present the fixed operation and maintenance cost (FOM), variable operation and maintenance cost (VOM), fuel cost and the capital cost in the Base Case and the CAIR Case by IPM model region and season in 2009 and 2018 run years respectively.

Table A17 FOM Cost by IPM Model Region (Million 1999$)

FOM Cost by Region	Base Case		CAIR Case	
	2009	2018	2009	2018
AZNM	999.8	1,173.9	999.8	1,173.9
CALI	1,399.3	1,767.7	1,397.1	1,767.6
DSNY	554.3	365.1	559.0	386.4
ECAO	3,163.2	3,282.9	3,310.1	3,583.2
ENTG	1,172.8	1,351.0	1,177.5	1,361.8
ERCT	1,905.2	2,084.9	1,905.2	2,097.9
FRCC	1,500.1	1,570.0	1,504.2	1,595.8
LILC	71.1	89.7	79.1	92.5
MACE	1,712.7	1,859.8	1,698.8	1,850.0
MACS	474.3	504.5	503.3	548.3
MACW	843.0	961.8	849.6	989.5
MANO	2,462.9	2,942.4	2,466.9	2,949.6
MAPP	1,282.3	1,352.2	1,276.4	1,347.3
MECS	525.5	625.8	525.5	631.5
NENG	1,230.3	1,246.7	1,233.3	1,247.1
NWPE	512.5	539.5	518.4	545.3
NYC	145.0	162.1	145.0	167.5
PNW	906.4	988.3	906.4	988.1
RMPA	295.2	305.0	295.5	305.3
SOU	1,490.9	1,674.5	1,510.6	1,777.1
SPPN	477.7	564.3	477.7	566.9
SPPS	651.9	715.0	656.3	722.2
TVA	1,380.2	1,469.9	1,384.2	1,508.4
UPNY	726.7	792.6	713.3	782.1
VACA	2,764.7	3,099.6	2,756.4	3,096.6
WUMS	461.8	494.1	461.8	495.5
National Total	29,109.7	31,983.2	29,311.5	32,577.6

Table A18 VOM Cost by IPM Model Region (Million 1999$)

VOM Cost by Region	Base Case		CAIR Case	
	2009	2018	2009	2018
AZNM	301.4	349.7	301.3	349.7
CALI	525.1	677.9	523.7	677.6
DSNY	41.0	34.1	41.4	51.4
ECAO	1,218.5	1,316.6	1,378.1	1,883.4
ENTG	158.6	195.1	170.2	228.0
ERCT	493.4	602.5	492.9	621.6
FRCC	303.2	404.1	307.8	466.1
LILC	24.9	39.5	24.4	33.6
MACE	140.5	166.4	137.6	174.4
MACS	70.6	83.1	97.8	141.1
MACW	188.1	203.1	226.7	300.4
MANO	313.9	359.5	335.8	408.4
MAPP	306.1	337.8	309.5	353.1
MECS	146.3	181.0	145.8	211.6
NENG	174.5	205.0	176.8	205.3
NWPE	235.2	249.6	236.7	252.7
NYC	12.1	25.5	12.1	30.0
PNW	93.3	126.3	93.3	126.0
RMPA	117.5	128.0	117.2	127.9
SOU	409.5	512.1	431.8	720.1
SPPN	147.0	158.1	147.4	161.5
SPPS	201.2	231.2	204.0	242.3
TVA	286.2	312.0	290.1	400.3
UPNY	81.8	90.4	85.0	91.1
VACA	570.6	679.9	602.2	720.4
WUMS	110.0	138.3	111.4	143.2
National Total	6,670.4	7,807.0	7,001.0	9,121.3

Table A19 Fuel Cost by IPM Model Region (Million 1999$)

Fuel Cost by Region	Base Case		CAIR Case	
	2009	2018	2009	2018
AZNM	2,231.5	2,884.8	2,296.0	2,912.2
CALI	3,804.4	5,249.7	3,883.0	5,266.9
DSNY	512.8	531.4	537.3	642.6
ECAO	5,452.7	6,207.7	5,346.3	5,844.2
ENTG	1,700.8	2,398.6	1,817.2	2,388.2
ERCT	4,950.1	5,835.0	5,121.9	5,812.3
FRCC	2,979.2	4,480.9	3,045.0	4,282.9
LILC	400.7	530.3	407.5	454.6
MACE	1,106.4	1,453.7	1,195.5	1,461.6
MACS	528.2	599.7	502.4	599.4
MACW	1,039.5	1,258.4	1,039.9	1,176.8
MANO	2,073.1	2,192.0	2,133.0	2,158.4
MAPP	1,560.0	1,666.6	1,561.8	1,676.2
MECS	1,070.6	1,322.5	1,075.2	1,434.1
NENG	1,868.1	2,291.3	1,915.8	2,297.8
NWPE	679.2	643.8	687.8	659.6
NYC	313.2	459.5	326.0	512.2
PNW	1,078.6	1,326.2	1,126.8	1,333.3
RMPA	429.3	596.2	426.8	595.4
SOU	3,933.6	5,195.6	4,146.3	5,399.1
SPPN	678.0	731.7	683.1	726.5
SPPS	1,908.5	2,197.0	1,952.0	2,287.2
TVA	1,633.0	1,868.4	1,675.8	1,972.9
UPNY	599.3	758.0	655.3	703.8
VACA	3,057.0	3,800.8	3,135.3	3,928.7
WUMS	625.4	748.5	632.9	732.9
National Total	46,213.0	57,228.2	47,325.9	57,259.8

Table A20 Capital Cost by IPM Model Region (Million 1999$)

Capital Cost by Region	Base Case		CAIR Case	
	2009	2018	2009	2018
AZNM	0.0	114.8	0.0	114.8
CALI	375.3	1287.1	454.1	1290.4
DSNY	0.0	0.7	0.0	73.3
ECAO	97.2	226.9	505.9	1164.9
ENTG	3.3	4.4	10.3	36.7
ERCT	0.9	978.4	0.6	1029.3
FRCC	13.3	455.4	25.2	540.3
LILC	54.0	167.9	62.4	143.9
MACE	4.2	22.1	4.2	33.8
MACS	18.2	134.0	94.7	261.9
MACW	0.0	0.3	80.9	162.8
MANO	2.7	21.6	35.4	71.3
MAPP	52.9	52.9	52.9	68.7
MECS	0.0	212.4	0.0	237.9
NENG	76.3	160.0	87.3	163.9
NWPE	0.0	23.0	0.0	23.0
NYC	0.0	103.9	0.0	137.1
PNW	5.5	183.8	5.5	182.2
RMPA	0.0	0.0	0.0	0.0
SOU	4.6	412.9	55.5	770.0
SPPN	5.3	28.0	5.3	51.0
SPPS	0.0	142.9	12.2	171.8
TVA	0.0	10.4	11.8	135.2
UPNY	0.0	4.1	11.6	23.2
VACA	232.6	647.5	221.1	667.1
WUMS	10.3	138.8	10.2	149.8
National Total	956.6	5,534.2	1,747.2	7,704.1

Department of Environmental Conservation
Division of Air Resources

NEW YORK
STATE IMPLEMENTATION PLAN
FOR
OZONE
(8-HOUR NAAQS)

ATTAINMENT DEMONSTRATION
FOR
NEW YORK METRO AREA

APPENDIX G

FINAL PROPOSED REVISION FEBRUARY 2008

New York State Department of Environmental Conservation
ELIOT SPITZER, GOVERNOR ***ALEXANDER GRANNIS, COMMISSIONER***

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Identification and Evaluation of Candidate Control Measures

Final
Technical Support Document

Prepared for:

Seth Barna
Ozone Transport Commission (OTC)
444 North Capitol Street, NW, Suite 638
Washington, DC 20001
(202) 508-3840

Prepared by:

MACTEC Federal Programs, Inc.
560 Herndon Parkway, Suite 200
Herndon, VA 20170
(703) 471-8383

February 28, 2007

Edward Sabo
Principal Scientist

Douglas A. Toothman
Principal Engineer

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Acronyms and Abbreviations

Acronym	Description
BOTW	Beyond-on-the-Way – refers to additional emission controls that are being considered
CAIR	Clean Air Interstate Rule
EGAS 5.0	Economic Growth Analysis System Version 5.0
EGU	Electric Generating Unit
EPA	U.S. Environmental Protection Agency
IPM	Integrated Planning Model
MANE-VU	Mid-Atlantic/Northeast Visibility Union
MARAMA	Mid-Atlantic Regional Air Management Association
MOBILE6	U.S. EPA's emission model for onroad sources
NESCAUM	Northeast States for Coordinated Air Use Management
NH3	Ammonia
NIF3.0	National Emission Inventory Input Format Version 3.0
NONROAD	U.S. EPA's emission model for certain types of nonroad equipment
NOx	Oxides of nitrogen
OTB/W	On-the-Books/On-the-Way – refers to emission control programs already adopted and proposed emission controls that will result in post-2002 emission reductions
OTC	Ozone Transport Commission
OTC 2001 model rules	Model rules developed by the OTC in 2001
OTC 2006 model rules	Model rules developed by the OTC in 2006
PM10-PRI	Particulate matter less than or equal to 10 microns in diameter that includes both the filterable and condensable components of particulate matter
PM25-PRI	Particulate matter less than or equal to 2.5 microns in diameter that includes both the filterable and condensable components of particulate matter
SIC	Standard Industrial Classification code
SIP	State Implementation Plan
SCC	Source Classification Code
SO2	Sulfur dioxide
VOC	Volatile organic compounds

1.0 EXECUTIVE SUMMARY

The States of the Ozone Transport Region (OTR) are faced with the requirement to submit attainment demonstration plans for the 8-hour ozone National Ambient Air Quality Standards (NAAQS). To accomplish this, most of the states will need to implement additional measures to reduce emissions that either directly impact their nonattainment status, or contribute to the nonattainment status in other states. As such, the Ozone Transport Commission (OTC) undertook an exercise to identify a suite of additional control measures that could be used by the OTR states in attaining their goals.

The OTC staff and member states formed several workgroups to identify and evaluate candidate control measures. Initially, the Workgroups compiled and reviewed a list of approximately 1,000 candidate control measures. These control measures were identified through published sources such as the U.S. Environmental Protection Agency's (EPA's) Control Technique Guidelines, STAPPA/ALAPCO "Menu of Options" documents, the AirControlNET database, emission control initiatives in member states as well as other states including California, state/regional consultations, and stakeholder input. The Workgroups developed a preliminary list of 30 candidate control measures to be considered for more detailed analysis. These measures were selected to focus on the pollutants and source categories that are thought to be the most effective in reducing ozone air quality levels in the Northeastern and Mid-Atlantic States.

The Workgroups discussed the candidate control measures during a series of conference calls and workshops held periodically from the spring of 2004 through the autumn of 2006. The Workgroups collected and evaluated information regarding emission benefits, cost-effectiveness, and implementation issues. Each of the candidate control measures were summarized in a series of "Control Measure Summary Sheets". Stakeholders were provided multiple opportunities to review and comment on the Control Measure Summary Sheets.

Based on the analyses by the OTC Workgroups, the OTC Commissioners made several recommendations at the June 2006 Commissioners' meeting in Boston (OTC 2006a-d) and at the November 2006 Commissioners' meeting in Richmond (OTC 2006e-g). The Commissioners recommended that States consider emission reductions from the following source categories:

- Consumer Products
- Portable Fuel Containers
- Adhesives and Sealants Application
- Diesel Engine Chip Reflash
- Cutback and Emulsified Asphalt Paving

- Asphalt Production Plants
- Cement Kilns
- Glass Furnaces
- Industrial, Commercial, and Institutional (ICI) Boilers
- Regional Fuels

Additionally, the Commissioners directed the OTC to evaluate control measures for Electric Generating Units (EGUs) and high electric demand day units (these measures will be addressed in a separate OTC report) Finally, the Commissioners requested that EPA pursue federal regulations and programs designed to ensure national development and implementation of control measures for the following categories: architectural and maintenance coatings, consumer products, ICI boilers over 100 mmBtu/hour heat input, portable fuel containers, municipal waste combustors, regionally consistent and environmentally sound fuels, small offroad engine emission regulation, and gasoline vapor recovery (OTC 2006d).

See Appendix A for a full description of the process used by the OTC to identify and evaluate candidate control measures.

Table 1-1 summarizes information about the control measures identified by the OTC Commissioners at the June 2006 and November OTC meetings. Table 1-1 identifies the sector, the source category, and a brief description of the control measure. Next is a column that identifies the recommended approach for implementing the rule, such as an OTC model rule or updates to existing state-specific rules. The next two columns show the percent reduction from 2009 emission levels. The final column provides the cost effectiveness estimate in units of dollars per ton of pollutant removed.

Table 1-2 summarizes the expected emission reductions by pollutant, control measure and State. The emission reductions listed in Table 1-2 are for 2009, and take into account only the incremental reductions from the control measures listed in Table 1-1. Figures 1-1 and 1-2 show the anticipated emission reductions by state for VOC and NOx, respectively.

Table 1-1 Summary of OTC 2006 Control Measures

Sector	Source Category	Control Measure	Implementation Method	Percent Reduction from 2009 OTB/W Emission Levels		Cost Effectiveness ($/ton)
				NOx	VOC	
Area	Adhesives, Sealants, Adhesive Primers, and Sealant Primers (Industrial)	Enact VOC content limits similar to those contained in the CARB RACT/BARCT document for adhesives and sealants (Dec. 1998)	Model Rule	---	64	VOC: 2,500
Area	Cutback and Emulsified Asphalt Paving	Prohibits the use of cutback asphalt during the ozone season Limits the use of emulsified asphalt during the ozone season to that which contains not more than 0.5 mL of oil distillate from a 200 mL sample as determined using ASTM Method D244	State Rule Update	---	State specific depending on current rules	VOC: minimal
Area	Consumer Products	Adopt the CARB 7/20/05 Amendments which sets new or revises existing VOC limits on 12 consumer product categories (does not include reductions for Tier2 shaving gels and antistatic aerosols since they have a later compliance date).	Model Rule	---	2	VOC: 4,800
Area	Portable Fuel Containers	Adopt the CARB 2006 Amendments broadening the definition of PFCs to include kerosene and diesel containers and utility jugs used for fuel, and other changes to make OTC Model Rule consistent with CARB requirements.	Model Rule	---	State specific	VOC: 800 to 1,400
Area and Point	Asphalt Production Plants	Area/Point Sources Batch Natural Gas 0.02 lb/ton or equivalent ppm Batch Distillate 0.09 lb/ton or equivalent ppm Drum Natural Gas 0.02 lb/ton or equivalent ppm Drum Distillate 0.04 lb/ton or equivalent ppm or Low NOx Burners, Best Management Practices	State Rule Update	10 - 35	---	NOx: <500 to 1,250

Sector	Source Category	Control Measure	Implementation Method	Percent Reduction from 2009 OTB/W Emission Levels		Cost Effectiveness ($/ton)
				NOx	VOC	
Area and Point	Industrial/ Commercial/ Institutional (ICI) Boilers >250 mmBtu/hour	Option 1 – Purchase current year NOx allowances equal to reductions needed to achieve the required emission rates Option 2 – Phase I 2009 emission rate equal to EGUs of similar size; Phase II 2013 emission rate equal to EGUs of similar size	Model Rule	Boiler and State specific	---	NOx: 600 to 18,000
Area and Point	ICI Boilers 100-250 mmBtu/hour	NOx Strategy #1: Nat gas: 0.10 lb/mmBtu #2, #4, #6 Oil: 0.20 lb/mmBtu Coal: 0.08 to 0.22 lb/mmBtu, depending on boiler type NOx Strategy #2: Reductions achievable through LNB/SNCR, LNB/FGR, SCR or some combination of these controls NOx Strategy #3: 60% reduction from uncontrolled NOx Strategy #4: Purchase current year CAIR allowances	State Rule Update	Boiler and State specific	---	NOx: 600 to 18,000
Area and Point	ICI Boilers 25-100 mmBtu/hour	NOx Strategy #1: Nat gas: 0.05 lb/mmBtu #2 Oil: 0.08 lb/mmBtu #4, #6 Oil: 0.20 lb/mmBtu Coal: 0.30 lb/mmBtu NOx Strategy #2: 50% reduction from uncontrolled NOx Strategy #3: Purchase current year CAIR allowances	State Rule Update	Boiler and State specific	---	NOx: 600 to 18,000
Area and Point	ICI Boilers <25 mmBtu/hour	Annual boiler tune-up	State Rule Update	State specific	---	

Sector	Source Category	Control Measure	Implementation Method	Percent Reduction from 2009 OTB/W Emission Levels		Cost Effectiveness ($/ton)
				NOx	VOC	
Point	Glass Furnaces	Require furnace operators to meet the emission limits in the San Joaquin Valley rule by 2009. These limits are achievable through implementation of "oxyfiring" technology for each furnace at furnace rebuild. If the operator does not rebuild the furnace by 2009 or implement measures to meet the limits in the San Joaquin Valley rule, the operator would be required to purchase NOx allowances equal to the difference between actual emissions and the limits in the San Joaquin Valley rule. Compliance with Rule 4354 will allow manufacturers to use a mix of control options to meet the suggested limits. Manufacturers may propose alternative compliance methods to meet the specified limits, including emissions averaging.	State Rule or Permit	Source specific	---	NOx: 1,254 to 2,500
Point	Cement Plants	Require existing kilns to meet a NOx emission rate of 3.88 lbs/ton clinker for wet kiln 3.44 lbs/ton clinker for long dry kiln 2.36 lbs/ton clinker for pre-heater kiln 1.52 lbs/ton clinker for pre-calciner kiln	State Rule Update	Source specific	---	NOx: <2,500
Onroad Mobile	Diesel Truck Chip Reflash	Mandatory program to upgrade the version of software in engine electronic control module (ECM), (also known as "chip reflash) to reduce off-cycle NOx emissions.	Model Rule	10	---	NOx: 20-30
Onroad Mobile	Regional Fuel based on Reformulated Gasoline Options	Extend RFG requirements to counties in OTC that currently do not have RFG.	Memorandum of Understanding - OTC	State specific	State specific	VOC: 5,200 NOx: 3,700

Table 1-2 Estimated Emission Benefits in 2009 by State Resulting from the OTC 2006 Control Measures

	VOC Emission Reduction Benefit (summer tpd)							NOx Emission Reduction Benefit (summer tpd)							
State	**Adhesives & Sealants**	**Cutback\Emulsified Asphalt Paving**	**Consumer Products**	**PFC (Area)[a]**	**PFCs (Nonroad)[a]**	**Regional Fuels**	**Total VOC Reduction**	**Diesel Engine Chip Reflash**	**Regional Fuels**	**Asphalt Production**	**Cement Kilns**	**Glass/Fiberglass[b]**	**ICI Boilers Area Sources**	**ICI Boilers Point Sources**	**Total NOx Reduction**
CT	4.2	4.3	0.7	0.4	0.1	0.0	9.7	3.5	0.0	0.0	0.0	0.0	2.8	2.1	8.4
DE	1.0	0.0	0.1	0.1	<0.1	0.0	1.4	0.6	0.0	0.2	0.0	0.0	1.2	0.1	2.1
DC	0.1	0.0	0.1	0.1	<0.1	0.0	0.4	0.8	0.0	0.0	0.0	0.0	0.4	0.4	1.6
ME	2.5	10.6	0.2	0.1	<0.1	9.1	22.6	1.4	0.2	0.7	0.0	0.0	1.1	2.8	6.2
MD	5.8	0.0	1.0	1.4	0.4	3.2	11.8	5.6	0.0	0.1	13.1	0.3	1.2	2.4	22.7
MA[d]	8.9	8.1	10.2	1.7	0.5	0.0	29.3	6.7	0.0	0.6	0.0	1.5	6.6	6.8	22.2
NH	2.3	4.4	0.3	0.2	0.1	4.3	11.5	2.0	0.2	0.0	0.0	0.0	3.4	1.9	7.5
NJ	9.2	4.7	1.4	1.0	0.3	0.0	16.7	9.7	0.0	1.0	0.0	4.9	0.0	3.4	19.0
NY	21.5	16.4	3.7	2.6	0.8	56.9	101.9	16.1	2.1	0.0	15.3	5.8	33.8	7.0	80.1
PA	21.9	8.4	2.1	1.6	0.5	58.0	92.3	12.4	2.0	0.2	14.0	24.3	12.2	9.8	73.9
RI	1.5	1.1	0.2	0.2	<0.1	0.0	3.0	0.8	0.0	0.0	0.0	0.5	2.1	0.5	3.9
VT	2.2	1.8	0.1	0.1	<0.1	7.9	12.1	0.9	0.3	0.0	0.0	0.0	0.9	0.4	2.5
No. VA[c]	1.0	<0.1	0.5	0.4	0.1	0.0	1.9	2.5	0.0	0.1	0.0	0.0	3.9	0.1	6.6
OTR	**82.3**	**59.8**	**20.5**	**9.9**	**3.0**	**139.4**	**314.8**	**63.0**	**4.8**	**3.0**	**42.5**	**37.3**	**69.5**	**37.7**	**257.8**

a) The table shows the estimated emission reduction that will occur in 2009; additional reductions will occur in later years as new, less-emitting PFCs that comply with the OTC 2006 control measure penetrate the market.

b) The table show the maximum emission reduction from glass/fiberglass furnaces when the OTC 2206 control measure is fully implemented. No all of the reduction shown will be achieved by 2009.

c) The following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

d) MA proposed rule has a January 1, 2009 effective date and includes the VOC limits from the OTC 2001 model rule and those in the OTC 2006 model rule. The 2009 benefit MA shows the benefit from both sets of limits. For all other States, the 2009 benefit shows the change in emissions from the OTC 2006 model rule only.

Figure 1-1 VOC Emission Reduction Benefits from OTC 2006 Control Measures in 2009

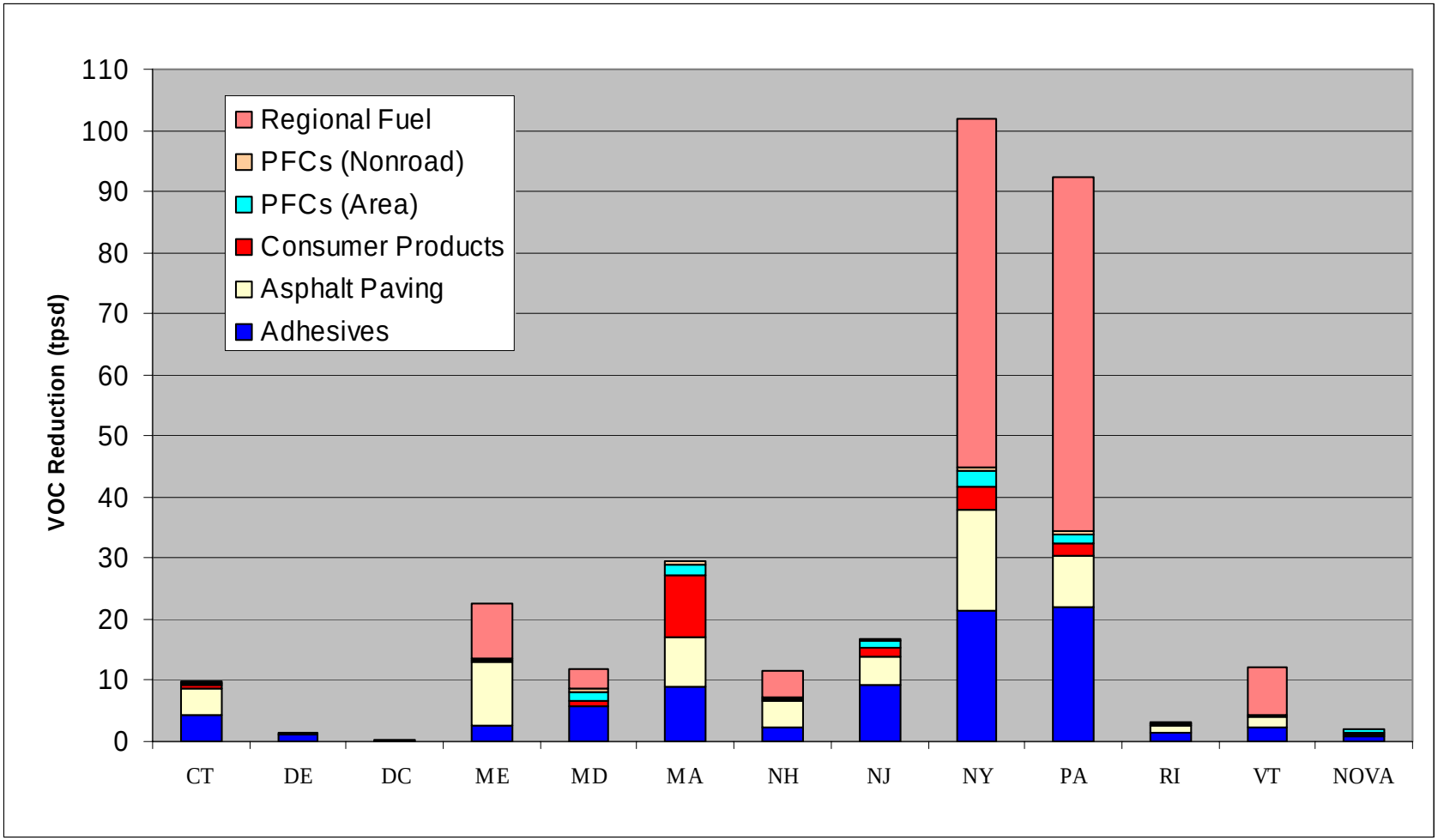
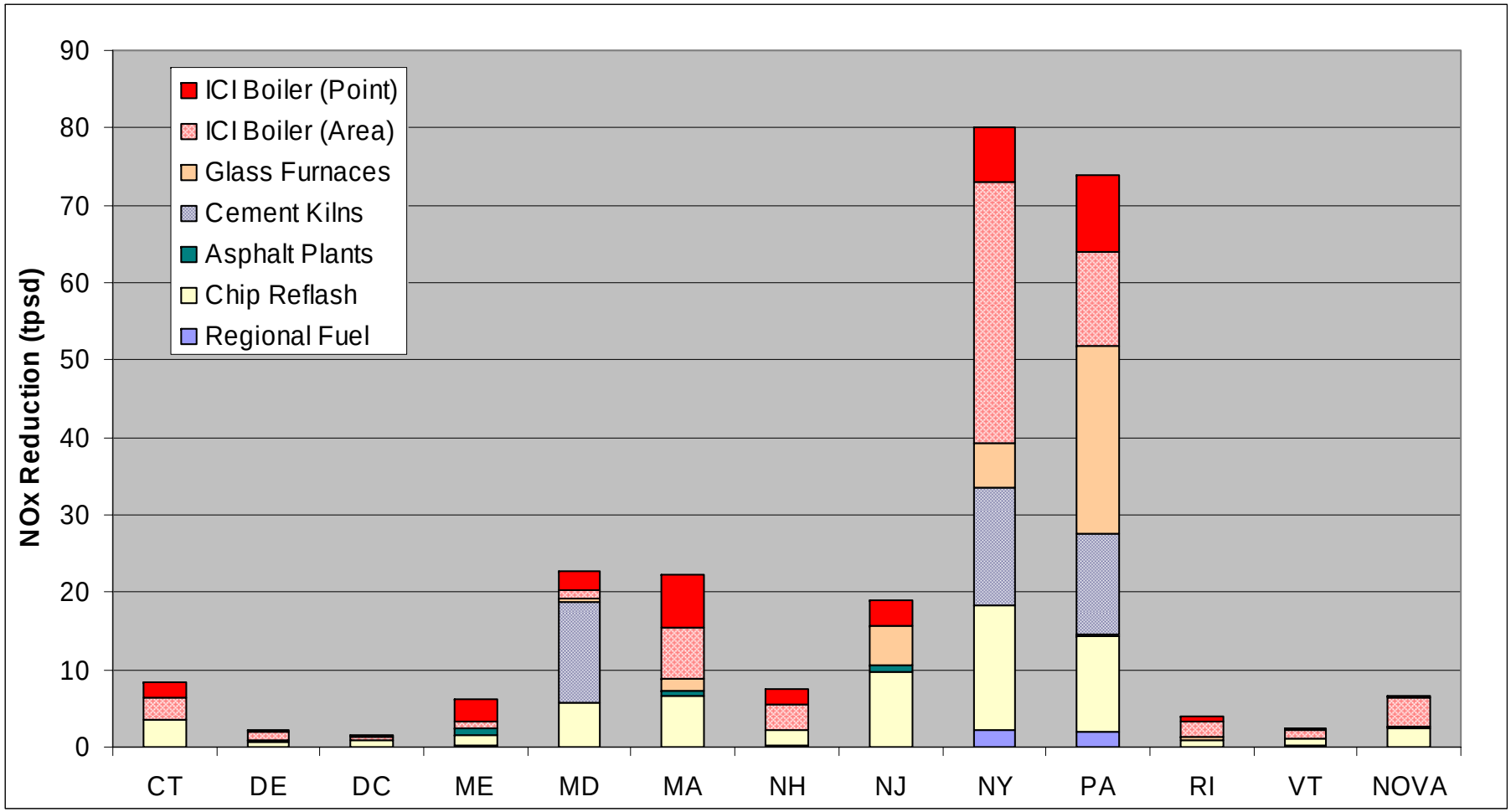


Figure 1-2 NOx Emission Reduction Benefits from OTC 2006 Control Measures in 2009



2.0 INTRODUCTION

The Ozone Transport Commission (OTC) is a multi-state organization created under the Clean Air Act (CAA). The OTC is responsible for advising EPA on transport issues and for developing and implementing regional solutions to the ground-level ozone problem in the Northeast and Mid-Atlantic regions. To supplement local and state-level efforts to reduce ozone precursor emissions, which may not alone be sufficient to attain federal standards, the OTC member states are considering control measures appropriate for adoption by all states in the region as part of their planning to attain and maintain the 8-hour ozone National Ambient Air Quality Standards (NAAQS).

The development of the control measures described in this document parallels a prior effort. The OTC developed a series of model rules in 2001 for the States to consider in adopting control measures to reduce volatile organic compound (VOC) emissions and oxide of nitrogen (NOx), which are ozone precursors, to (1) assist in the attainment of the one-hour ozone health standard, (2) address the VOC and NOx emission reduction shortfalls identified by EPA, and (3) implement the State Implementation Plans (SIP) commitments to EPA. These model rules, which have been adopted in many OTC states, will be referred to as the "OTC 2001 model rules" in this document.

The analysis in this report provides a description of the control measures identified by the OTC to help states attain the 8-hour ozone NAAQS. It also describes the associated incremental emission reductions and costs associated with each measure. The control measures analyzed in this report are those that were identified by the OTC Commissioners at the June 2006 OTC annual meeting in Boston (OTC 2006a, OTC 2006b, OTC 2006c) and at the November 2006 OTC fall meeting in Richmond (OTC 2006d, OTC 2006e, OTC 2006f). These control measures will be referred to as the "OTC 2006 control measures" in this document. For some source categories, the OTC has amended the OTC 2001 model rules or developed new model rules. These model rules will be referred to as the "OTC 2006 model rules" in this document.

The OTC 2006 model rules for volatile organic compounds (VOC) will reduce emissions from adhesives, sealants, adhesive primer, and sealant primer application; cutback and emulsified asphalt paving; consumer products; regional fuels; and portable fuel containers. The OTC 2006 control measures for oxides of nitrogen (NOx) will reduce emissions from asphalt production plants, cement kilns, diesel engine chip reflash, regional fuels, electric generating units (EGUs), glass and fiberglass furnaces, and industrial, commercial, institutional (ICI) boilers.

Section 3 describes the methods used to estimate the emission benefits of the VOC control measures. For each source category, there are subsections that describe the existing Federal and OTC State

regulations that affect the VOC emissions, summarize the major elements of the control measures, discuss how the emission benefits were quantified, and present information on anticipated costs and cost-effectiveness. VOC emissions and reductions by State and source category in 2002 and 2009 are presented at the end of Section 3. Section 4 presents similar information for the NOx source categories. Section 5 presents similar information for the SO2 source categories. Section 6 provides a list of references used in developing this report.

Appendix A presents a brief description of the process that the OTC followed in identifying and evaluating candidate control measures. Appendix B lists the approximately 1,000 control measures that were initially analyzed. Appendix C contains the control measure summary sheets that were developed during this analysis. Appendices D, E, and F present the emission benefits by county for VOC, NOx, and SO2 respectively. Each appendix contains a tabulation of the 2002 base emissions, the projected 2009/2012/2018 emissions and expected emission reduction benefit from the additional control measures in 2009/2012/2018). Appendix G contains a listing of State ICI boiler regulations.

3.0 VOC ANALYSIS METHODS

This Section describes the analysis of the 2006 OTC control measures to reduce VOC emissions from five source categories: adhesives, sealants, adhesive primer, and sealant primer application; cutback and emulsified asphalt paving; consumer products; regional fuels; and portable fuel containers. For each of the five categories, there are separate subsections that discuss existing Federal/state rules, summarize the requirements of the 2006 OTC control measure, describe the methods used to quantify the emission benefit, and provide an estimate of the anticipated costs and cost-effectiveness of the control measure. At the end of Section 3, we provide the estimated emissions for 2002 and 2009 by source category and State. Appendix D provides county-by-county summaries of the emission reductions for each of the categories and projection years.

3.1 ADHESIVES, SEALANT, ADHESIVE PRIMER, AND SEALANT PRIMER APPLICATION

Adhesives, sealants, adhesive primer, and sealant primer are used in product manufacturing, packaging, construction, and installation of metal, wood, rubber, plastic, ceramics, or fiberglass materials. In general, an adhesive is any material used to bond two surfaces together. In general, a sealant is a material with adhesive properties that is used primarily to fill, seal, waterproof or weatherproof gaps or joints between two surfaces.

VOC emissions from this category result from evaporation of solvents during transfer, drying, surface preparation and cleanup operations. These solvents are the media used to solubilize the adhesive, sealant, or primer material so that it can be applied. The solvent is also used to completely wet the surface to provide a stronger bond. In plastic pipe bonding, the solvent dissolves the polyvinyl chloride pipe and reacts with the pipe to form a bond. Solvents used to clean the surface before bonding and to clean the application equipment after bonding also contribute to VOC emissions.

VOC emissions in this category are primarily from industrial and commercial operations such as wood product manufacturers, upholstery shops, adhesives retailers and architectural trades, such as building construction, floor covering installation and roof repair.

3.1.1 Existing Federal and State Rules

EPA published the consumer and commercial products rule on September 11, 1998 (40 CFR Part 59 Subpart D) under authority of Section 183(e) of the Clean Air Act. The Federal Part 59

Subpart C requirements for consumer products regulate five types of "household" adhesives (aerosols, contact, construction and panel, general purpose and structural waterproof). The VOC content limits for these products apply only to "household products", defined as "any consumer product that is primarily designed to be used inside or outside of living quarters or residences, including the immediate surroundings, that are occupied or intended for occupation by individuals." Thus, the Part 59 rule applies only to adhesives used in household settings and not to adhesives used in industrial or commercial applications.

The OTC developed a model rule for consumer and commercial products in 2001 (referred to as the "OTC 2001 model rule for consumer products" in this document) to regulate additional consumer product categories by requiring more stringent VOC content limits than the Federal rule. The OTC 2001 model rule for consumer products contains VOC limits for adhesives and sealants. However, with the exception of aerosol adhesives, the definitions of these products generally exempt products sold in larger containers. Specifically, the OTC 2001 model rule includes the following definitions (italics added for emphasis):

- Section 2(8) Adhesive. "Adhesive" means any product that is used to bond one surface to another by attachment. "Adhesive" does not include products used on humans and animals, adhesive tape, contact paper, wallpaper, shelf liners, or any other product with an adhesive incorporated onto or in an inert substrate. For "Contact Adhesive," *adhesive does not include units of product, less packaging, which consist of more than one gallon*. For "Construction, Panel, and Floor Covering Adhesive," and "General Purpose Adhesive", *adhesive does not include units of product, less packaging, which weigh more than one pound and consist of more than 16 fluid ounces*. This limitation does not apply to aerosol adhesives.

- Section 2(148) Sealant and Caulking Compound. "Sealant and Caulking Compound" means any product with adhesive properties that is designed to fill, seal, waterproof, or weatherproof gaps or joints between two surfaces. "Sealant and Caulking Compound" does not include roof cements and roof sealants; insulating foams; removable caulking compounds; clear/paintable/water resistant caulking compounds; floor seam sealers; products designed exclusively for automotive uses; or sealers that are applied as continuous coatings. *"Sealant and Caulking Compound" also does not include units of product, less packaging, which weigh more than one pound and consist of more than 16 fluid ounces.* For the purposes of this definition only, "removable caulking compounds" means a compound which temporarily seals windows or doors for three to six month time intervals, and "clear/paintable/water resistant caulking compounds" means a compound which contains no appreciable level of opaque fillers or pigments; transmits most or all visible light through the caulk when cured; is paintable; and is immediately resistant to precipitation upon application.

Thus, the same products sold in containers larger than the above thresholds are not covered by the OTC 2001 model rule for consumer products.

3.1.2 Description of the OTC 2006 Model Rule

The OTC 2006 model rule for adhesives and sealants is based on the reasonably available control technology (RACT) and best available retrofit control technology (BARCT) determination by the California Air Resources Board (CARB) developed in 1998. The OTC 2006 model rule has the following requirements:

A. Regulates the application of adhesives, sealants, adhesive primers and sealant primers by providing options for appliers to either to use a product with a VOC content equal to or less than a specified limit or to use add-on controls;

B. Limits the VOC content of aerosol adhesives to 25 percent by weight;

C. Requirements for cleanup solvents;

D. A VOC limit for surface preparation solvents;

E. An alternative add-on control system requirement of at least 85 percent overall control efficiency (capture and destruction efficiency), by weight;

F. VOC containing materials must be stored or disposed of in closed containers;

G. Prohibits the sale of any adhesive, sealant, adhesive primer or sealant primer which exceeds the VOC content limits listed in the model rule;

H. Manufacturers must label containers with the maximum VOC content as supplied, as well as the maximum VOC content on an as-applied basis when used in accordance with the manufacturer's recommendations regarding thinning, reducing, or mixing with any other VOC containing material; and

I. Prohibits the specification of any adhesive, primer, or sealant that violates the provisions of the model rule.

Several adhesive and sealant applications and products are exempt from this model rule: tire repair, assembly and manufacturing of undersea-based weapon systems, testing and evaluation associated with research and development, solvent welding operations for medical devices, plaque laminating operations, products or processes subject to other state rules, low-VOC products (less than 20 g/l), and adhesives subject to the state rules based on the OTC 2001 consumer products model rule. Additionally, the model rule provides an exemption for adhesive application operations at stationary sources that use less than 55 gallons per calendar year of noncomplying adhesives and for stationary sources that emit not more than 200 pounds of VOCs per year from adhesives operations.

3.1.3 Emission Benefit Analysis Methods

Emissions from this category are classified as both point sources and area sources. About 96 percent of adhesive and sealant VOC emissions in the OTC states fall into the area source category. The remaining four percent of the VOC emissions are included in the point source inventory.

The emission reduction benefit estimation methodology for area sources is based on information developed and used by CARB for their RACT/BARCT determination in 1998. CARB estimates that the total industrial adhesive and sealant emissions in California to be about 45 tons per day (tpd). Solvent-based emissions are estimated to be about 35 tpd of VOC and water-based adhesive and sealant emissions are about 10 tpd of VOC. CARB indicated that the emission reductions would be achieved mainly due to the switch from high-VOC to low-VOC products rather than from the use of add-on control devices. CARB estimated that emission reductions achieved by statewide compliance with the VOC limits in the RACT/BARCT determination will range from approximately 29 to 35 tpd (CARB 1998, pg. 18). These emission reductions correspond to a 64.4 to 77.8 percent reduction from uncontrolled levels. For OTC modeling purposes, we used the lower end of this range (i.e., 64.4 percent reduction) to estimate the emission benefit for area sources due to the OTC 2006 model rule.

For point sources, we first identified those sources that were applying adhesives and sealants (using the source classification code of 4-02-007-xx, adhesives application). Next, we reviewed the MANEVU inventory to determine whether sources had existing capture and control systems. Several sources reported capture and destruction efficiencies in the 70 to 99 percent range. A few sources reported capture and destruction efficiencies of 99+ percent. Most of the controlled sources reported capture and destruction efficiencies in the 90-98 percent range. Sources with existing control systems that exceed an 85 percent overall capture and destruction efficiency would meet the OTC 2006 model rule provision for add-on air pollution control equipment; no additional reductions were calculated for these sources. For point sources without add-on control equipment, we used the 64.4 percent reduction discussed in the previous paragraph based on the CARB determination.

3.1.4 Cost Estimates

The cost of complying with the new requirements includes the cost of using alternative formulations of low-VOC or water-based adhesives, sealants, adhesive primers, and sealant primers and cleanup products. Based on information provided by the Ventura County Air Pollution Control District, CARB determined that the cost-effectiveness of their adhesives rule

ranges from a savings of $1,060 per ton to a cost of $2,320 per ton of VOC reduced (CARB 1998, pg. 17). These costs are likely to be less in the OTR, because some of the one-time research and reformulation costs incurred for products sold in California will not have to be incurred again for products sold in the OTR. CARB also reports a cost-effectiveness of $9,000 to $110,000 per ton of VOC reduced for the use of add-on control equipment to comply with the requirements.

3.2 CUTBACK AND EMULSIFIED ASPHALT PAVING

Asphalt paving is used to pave, seal and repair surfaces such as roads, parking lots, drives, walkways and airport runways. Asphalt paving is grouped into three general categories: hot-mix, cutback, and emulsified. Hot-mix asphalt is the most commonly used paving asphalt. Hot-mix asphalt produces minimal VOC emissions because its organic components have high molecular weights and low vapor pressures. Cutback asphalt is used in tack and seal operations, in priming roadbeds for hot-mix application and for paving operations for pavements up to several inches thick. In preparing cutback asphalt, asphalt cement is blended or "cut back" with a diluent, typically from 25 to 45 percent by volume of petroleum distillates, depending on the desired viscosity. Emulsified asphalt is used in most of the same applications as cutback asphalt but is a lower emitting alternative to cutback asphalt. Instead of blending asphalt cement with petroleum distillates, emulsified asphalts use a blend of asphalt cement, water and an emulsifying agent, such as soap. Some emulsified asphalts contain virtually no VOC diluents; however, some emulsified asphalts may contain up to 12 percent VOC by volume.

3.2.1 Existing Federal and State Rules

The EPA published a Control Technique Guideline (CTG) for the use of cutback asphalt in December 1977. The CTG recommended replacing cutback asphalt binders with emulsified asphalt during the ozone season. In 1979, EPA added a specification for emulsified asphalt to the CTG recommendations to limit the content of oil distillate in emulsified asphalt to no higher than 7 percent oil distillate.

Table 3-1 summarizes the current asphalt paving rules for the 13 OTR states. Most of the states in the OTR have adopted the CTG banning cutback asphalt in the ozone season. Some states have exemptions to this rule, allowing the use of cutback asphalt with up to 5 percent VOC. For emulsified asphalt, the requirements vary greatly. The VOC content of emulsified asphalt is limited to 0-12 percent, depending on the State and the type of emulsified asphalt. Delaware completely bans the use of emulsified asphalt that contains any VOC.

Table 3-1 Summary of OTC State Rules for Cutback and Emulsified Asphalt

State	Cutback Asphalt	Emulsified Asphalt
CT	22a-174-20 (k): VOC content limited to 5% during June, July, August, and September	Nothing specified
DE	Reg. No. 24, Section 34: Ban during ozone season	Reg. No. 24, Section 34: Ban on use of emulsified asphalt that contains any VOC
DC	Chapter 7 Section 8-2:707(k): Ban during the months of April, May, June, July, August, and September	Nothing specified
ME	Chapter 131: Ban during the period May 1 through September 15, with some exceptions	Chapter 131: VOC content limited to 3-12%, depending on the type of use
MD	COMAR 26.11.11.02: Ban during the period April 16 through October 14	COMAR 26.11.11.02: Allowed upon approval of the Department; no VOC content limit specified
MA	310 CMR 7.18(9): Ozone season ban on cutback asphalt with VOC content greater than 5% by weight with exemptions including use as prime coat	Nothing Specified
NH	Env-A 1204.42: Ban during the months of June through September; cutback with up to 5% VOC allowed upon approval of Department	Env-A 1204.42: VOC content limited to 3-12%, depending on the type of use
NJ	7:27-16.19: Ban from April 16 through October 14, with some exemptions	7:27-16.19: VOC content limited to 8% by volume
NY	Part 211: Ban from May 2 through October 15	Part 211: VOC content limited to 2-12%, depending on the type of ASTM grade
PA	25 Pa. Code Section 129.64: Ban from May 1 to October 30	25 Pa. Code Section 129.64: VOC content limited to 0-12%, depending on type
RI	Reg. No. 25: Ban from April 1 to September 30, with some exemptions	Reg No. 25: VOC content limited to 3-12%, depending on application/use
VT	5-253.15: Ban on cutback asphalt with VOC content greater than 5% by weight, with some exemptions	5-253.15: Ban on emulsified asphalt with VOC content greater than 5% by weight
VA	Chapter 40, Article 39: Ban during April through October	Chapter 40, Article 39: VOC content limited to 6% by volume

3.2.2 Description of the OTC 2006 Model Rule

The OTC 2006 model rule for the asphalt paving control measure prohibits the use of cutback asphalt during the ozone season and limits the use of emulsified asphalt to that which contains not more than 0.5 mL of oil distillate from a 200 mL sample (as determined using American Society for Testing and Materials {ASTM} Method D244 - Test Methods for Emulsified Asphalts) regardless of application. This is equivalent to a VOC content of 0.25 percent. Exemptions may be granted under certain circumstances upon the approval of the State commissioner.

3.2.3 Emission Benefit Analysis Methods

The OTC 2006 control measure for asphalt paving calls for a complete ban on the use of cutback asphalt during the ozone season. As shown in Table 3-1, current state regulations generally ban the use of cutback asphalt during the ozone season. However, there are exemptions from the ban and as a result there are VOC emissions from the use of cutback asphalt during the ozone season. The OTC 2006 control measure eliminates any exemptions and totally eliminates any VOC emissions from the use of cutback asphalt during the ozone season.

The emission reductions resulting from OTC 2006 control measure for emulsified asphalt vary by State. The two percent VOC content limit on emulsified asphalt depend on the baseline VOC content of emulsified asphalt. The control measure limits emulsified asphalt to not more than 0.5 mL of oil distillate from a 200 mL sample as determined using ASTM Method D244. This is equivalent to a VOC content of 0.25 percent. The baseline VOC content may range from 0 to 12 percent. New Jersey used a VOC content of 8 percent in their baseline emission calculations (based on the 8 percent limit in their current rule). Reducing the VOC content to 0.25 percent in New Jersey will result in a 96.9 percent reduction. Delaware already bans the use of emulsified asphalt that contains any VOC, so there is no reduction in Delaware. Several other states used an average VOC content of 2.5 percent when developing their emission inventory. Thus, reducing the average VOC content from 2.5 percent to 0.25 percent results in a 90 percent reduction in VOC emissions. For States that did not supply a baseline VOC content for asphalt paving, we used the 90 percent reduction in VOC emissions from emulsified asphalt paving during the ozone season.

3.2.4 Cost Estimates

Low-VOC alternatives are currently available and no additional costs are expected from their use.

3.3 CONSUMER PRODUCTS

Consumer and commercial products are those items sold to retail customers for personal, household, or automotive use, along with the products marketed by wholesale distributors for use in commercial or institutional settings such as beauty shops, schools and hospitals. VOC emissions from these products are the result of the evaporation of propellant and organic solvents during use. Consumer and commercial products include hundreds of individual products, including personal care products, household products, automotive aftermarket products, adhesives and sealants, FIFRA-related insecticides, and other miscellaneous products.

3.3.1 Existing Federal and State Rules

EPA published the Federal consumer and commercial products rule on September 11, 1998 (40 CFR Part 59 Subpart D) under authority of Section 183(e) of the Clean Air Act. This rule limits the VOC content of 24 product categories representing 48 percent of the consumer and commercial products inventory nationwide. According to EPA, VOC emissions from those 24 product categories were reduced by 20 percent. But since over half of the inventory is unaffected by the rule, the Federal rule is estimated to yield VOC reductions of 9.95 percent of the total consumer products inventory (Pechan 2001, pg 7).

Since over half of the inventory is unregulated by the Federal Part 59 rule, the OTC developed a model rule for consumer and commercial products in 2001 (referred to as the "OTC 2001 model rule for consumer products" in this document) to be used by the OTC jurisdictions to develop regulations for additional consumer product categories and to specify more stringent VOC content limits than the Federal rule. The VOC content limits and products covered in the OTC 2001 model rule are similar to the rules developed by CARB in the late 1990s. The OTC 2001 model rule for consumer products provides background for OTC jurisdictions to develop programs to regulate approximately 80 consumer product categories and includes technologically feasible VOC content limits. The emission reductions for state programs based on the OTC 2001 model rule are estimated to be 14.2 percent of the total consumer product inventory beyond the national rule reduction (Pechan 2001, pg. 8).

Most, but not all, states in the OTR have adopted regulatory programs based on the OTC 2001 model rule for consumer products. Table 3-2 summarizes the adoption status for the 13 OTR jurisdictions.

Table 3-2 Status of OTC State's Promulgation of the OTC 2001 Model Rule for Consumer Products.

State	Effective Date of VOC Limits	Regulatory Citation
CT [a]	Initiated process to adopt in 2006	R.C.S.A. section 22a-174-40
DE	Effective January 1, 2005	Regulation Number 41
DC	Effective June 30, 2004	Regulation 719
ME	Effective May 1, 2005	Chapter 152
MD	Effective January 1, 2005	COMAR 26.11.32
MA [b]	In progress – proposed effective date is January, 2009	310 CMR 7.25(12)
NH	Effective January 1, 2007	Chapter Env-A 4100
NJ	Effective Janaury 1, 2005	Chapter 27, Subchapter 24
NY	Effective January 1, 2005	Chapter 3, Part 235
PA	Effective January 1, 2005	25 Pa. Code Chapter 130, Subchapter B
RI	Intend to develop in 2006	n/a
VT	Under Consideration	n/a
VA [c]	Effective July 1, 2005	Chapter 40, Article 50

a) Connecticut's proposed rule includes both the VOC limits from the OTC 2001 model rule and the new and revised VOC emissions limits and related provisions that were adopted by the California Air Resources Board on July 20, 2005. These new and revised VOC limits are identical to those in the OTC 2006 model rule.

b) Massachusett's proposed rule includes the VOC limits from the OTC 2001 model rule and those in the OTC 2006 model rule.

c) Virginia's rule applies only in Northern Virginia VOC Emission Control Area (10 northern Virginia jurisdictions in the OTR)

3.3.2 Description of the OTC 2006 Model Rule

The OTC 2001 model rule for consumer products closely mirrored a series of five CARB consumer products rules. CARB recently amended their consumer products rules in July 2005. As shown in Table 3-3, these amendments to the CARB rule affected 18 categories of consumer products (14 new categories, including subcategories, with new product category definitions and VOC limits; one previously regulated category with a more restrictive VOC limit; and two previously regulated categories with additional requirements).

Table 3-3 Consumer Products Affected by CARB's July 2005 Rule Amendments

New Categories with VOC Limits for Regulation	
Adhesive Remover	Footwear or Leather Care Product
– 4 subcategories	Hair Styling Product[a]
Anti-Static Product	Graffiti Remover
Electrical Cleaner	Shaving Gel
Electronic Cleaner	Toilet/Urinal Care Product
Fabric Refresher	Wood Cleaner
Previously Regulated Category with More Restrictive Limit	
Contact Adhesive[b]	
Previously Regulated Categories with Additional Requirements	
Air Fresheners	General Purpose Degreasers

a) This product category will incorporate Hair Styling Gel and include additional forms of hair styling products (i.e., liquid, semi-solid, and pump spray) but does not include Hair Spray Product or Hair Mousse.

b) This product category has been separated into 2 subcategories: General Purpose and Special Purpose

Most of these new CARB limits become effective in California by December 31, 2006. Two of the limits, anti-static products (aerosol) and shaving gels, have effective dates in either 2008 or 2009. For shaving gels, there is a VOC limit that becomes effective on December 31, 2006, with a more stringent second tier limit that becomes effective on December 31, 2009. The anti-static product (aerosol) limit becomes effective on December 31, 2008.

The OTC 2006 model rule will modify the OTC 2001 model rule based on the CARB July 20, 2005 amendments. The OTC is not including the anti-static aerosol products and the second tier shaving gel limit in its revisions to the OTC 2001 model rule because of industry concerns that meeting these limits may not be feasible. CARB acknowledged these concerns by requiring a technology review of these product categories in 2008 to determine whether the limits are achievable.

3.3.3 Emission Benefit Analysis Methods

The emission reduction benefit estimation methodology is based on information developed by CARB. CARB estimates 6.05 tons per day of VOC reduced in California from their July 2005 amendments (CARB 2004a, pg. 8), excluding the benefits from the two products (anti-static products and shaving gels) with compliance dates in 2008 or 2009. This equates to about 2,208 tons per year in California. The population of California as of July 1, 2005 is 36,132,147

(Census 2006). On a per capita basis, the emission reduction from the CARB July 2005 amendments equals 0.122 lbs/capita.

Since the OTC's 2006 control measure is very similar to the CARB July 2005 amendments (with the exclusion of the anti-static products and shaving gel 2008/2009 limits), the per capita emission reductions are expected to be the same in the OTR. The per capita factor after the implementation of the OTC 2001 model rule is 6.06 lbs/capita (Pechan 2001, pg. 8). The percentage reduction from the OTC's 2006 control measure was computed as shown below:

Current OTC Emission Factor	=	6.06 lbs/capita
Benefit from CARB 2005 amendments	=	0.122 lbs/capita
Percent Reduction	=	100%*(1 - (6.06 – 0.122)/6.06)
	=	2.0%

3.3.4 Cost Estimates

CARB estimates that the cost effectiveness of VOC limits with an effective date of December 31, 2006, to be about $4000 per ton of VOC reduced (CARB 2004, pg. 21). CARB further estimates that the average increase in cost per unit to the manufacturer to be about $0.16 per unit. Assuming CARB's estimates for the OTR provides a conservative estimate, because some of the one-time research and reformulation costs incurred for products sold in California will not have to be incurred again for products sold in the OTR.

3.4 PORTABLE FUEL CONTAINERS

Portable fuel containers (PFCs) are designed for transporting and storing fuel from a retail distribution point to a point of use and the eventual dispensing of the fuel into equipment. Commonly referred to as "gas cans," these products come in a variety of shapes and sizes with nominal capacities ranging in size from less than one gallon to over six gallons. Available in metal or plastic, these products are widely used to refuel residential and commercial equipment and vehicles when the situation or circumstances prohibits direct refueling at a service station. PFCs are used to refuel a broad range of small off-road engines and other equipment (e.g., lawnmowers, chainsaws, personal watercraft, motorcycles, etc.). VOC emissions from PFCs are classified by five different activities:

- **Transport-spillage** emissions from PFCs occur when fuel escapes from PFCs that are in transit.
- **Diurnal** emissions result when stored fuel vapors escape to the air through any possible openings while the container is subjected to the daily cycle of increasing and decreasing

ambient temperatures. Diurnal emissions depend on the closed- or open- storage condition of the PFC.

- **Permeation** emissions are produced after fuel has been stored long enough in a container for fuel molecules to infiltrate and saturate the container material, allowing vapors to escape through the walls of containers made from plastic.
- Equipment refueling **vapor displacement** and **spillage** emissions result when fuel vapor is displaced from nonroad equipment (e.g., lawnmowers, chainsaws, personal watercraft, motorcycles, etc.) and from gasoline spillage during refueling of the equipment with PFCs. These VOC emissions are already taken into account in the nonroad equipment emission inventory by the NONROAD model.

Diurnal evaporative emissions are the largest category.

3.4.1 Existing Federal and State Rules

The OTC developed a model rule for PFCs in 2001. The OTC 2001 model rule was very similar to a rule adopted by CARB in 2000. The OTC 2001 model rule provides background for OTC jurisdictions to develop regulatory programs that require spill-proof containers to meet performance standards that reduce VOC emissions. The performance standards include a requirement that all PFCs to have an automatic shut-off feature preventing overfilling and an automatic closing feature so the can will be sealed when it is not being used. The performance standards also eliminate secondary venting holes and require new plastics to reduce vapor permeation through container walls. There is no requirement for owners of conventional PFCs to modify their PFCs or to scrap them and buy new ones. Compliance will be accomplished primarily through attrition. As containers wear out, are lost, damaged, or destroyed, consumers will purchase new spill-proof containers to replace the conventional containers. CARB determined that the average useful life of a PFC is five years. The OTC chose to assume a more conservative ten-year turnover rate, with 100 percent rule penetration occurring 10 years after adoption of the rule.

CARB estimated that the performance standards would reduce VOC emissions by 75 percent. CARB's 2004 analysis (CARB 2004b) reevaluated the estimate reductions due to some unforeseen issues with the new cans and new survey information. Based on CARB's updated data, CARB estimated that VOC emissions would be reduced by 65 percent from the first set of amendments.

CARB has also adopted a second set of amendments in two phases. The first phase was filed on January 13, 2006, effective February 12, 2006. For Phase I, CARM amended their PFC regulation to address the use of utility jugs and kerosene containers that are sometimes used by

consumers for gasoline. The second phase of the amendments was filed on September 11, 2006, effective October 11, 2006. These amendments (CARB 2006) will:

- Establish a mandatory certification program and accompanying test procedures;
- Amend the existing performance standards to eliminate the automatic shutoff performance standard effective July 1, 2007;
- Amend the existing performance standards to eliminate the fill height and flow rate performance standards;
- Amend the existing PFC pressure standard;
- Amend the current test methods;
- Change the permeability standard from 0.4 to 0.3 grams/gallon-day;
- Establish a voluntary consumer acceptance-labeling program that allows participating manufacturers to label their PFCs with an ARB "Star Rating" indicating how consumers rate their products' ease of use; and
- Combine the currently separate evaporation requirement and permeation standard and test method into a single diurnal standard and test method.

In February 2007, EPA finalized a national regulation to reduce hazardous air pollutant emissions from mobile sources. Included in the final rule are standards that would reduce PFC emissions from evaporation, permeation, and spillage. EPA included a performance-based standard of 0.3 grams per gallon per day of hydrocarbons, determined based on the emissions from the can over a diurnal test cycle specified in the rule. The standard applies to containers manufactured on or after January 1, 2009. The standards are based on the performance of best available control technologies, such as durable permeation barriers, automatically closing spouts, and cans that are well-sealed.

3.4.2 Description of the OTC 2006 Model Rule

As shown in Table 3-4, most states in the OTR have already adopted PFC regulations based on the OTC 2001 model rule. The OTC 2001 model rule for PFCs closely mirrors the 2000 version of CARB's PFC rule. CARB recently amended their gas can regulation as discussed above in Section 3.4.1. The OTC 2006 model rule closely mirrors these CARB amendments. The 2006 amendments are estimated to reduce VOC emissions by 18.4 tons per day in California at full implementation in the year 2015, in addition to the benefits from the existing regulation. The OTC 2006 model rule will modify the OTC 2001 model rule based on the recent CARB amendments.

Table 3-4 Status of OTC State's Promulgation of the OTC 2001 Model Rule for Portable Fuel Containers

State	Date When New Containers are Required	Regulatory Citation
CT	Effective May 1, 2004	Section 22a-174-43
DE	Effective January 1, 2004	Reg. No. 41, Section 3
DC	Effective November 15, 2003	Rule 720
ME	Effective January 1, 2004	Chapter 155
MD	Effective January 1, 2003	COMAR 26.11.13.07
MA[a]	In progress (effective date will be January 1, 2009)	n/a
NH	Effective March 1, 2006	Env-A 4000
NJ	Effective January 1, 2005	Subchapter 24 (7:27-24.8)
NY	Effective January 1, 2003	Part 239
PA	Effective January 1, 2003	25 Pa. Code Chapter 130, Subchapter A
RI	In progress (late 2006 target date for final rule)	n/a
VT	Under Consideration	n/a
VA[b]	Effective January 1, 2005	Chapter 40, Article 42

a) Massachusetts' proposed rule will be based only on the OTC 2006 model rule; Massachessetts will not adopt the OTC 2001 model rule.

b) Virginia's rule applies only in Northern Virginia VOC Emission Control Area (10 northern Virginia jurisdictions in the OTR)

3.4.3 Emission Benefit Analysis Methods

Emissions from PFCs are accounted for in both the area and nonroad source inventories. The NONROAD model accounts for equipment refueling vapor displacement and spillage emissions result when fuel vapor is displaced from nonroad equipment (e.g., lawnmowers, chainsaws, personal watercraft, motorcycles, etc.) and from gasoline spillage during refueling of the equipment with PFCs. The area source inventory accounts for diurnal and permeation emissions associated with the fuel present in stored PFCs and transport-spillage emissions associated with refueling of a gas can at the gasoline pump. Based on the OTC 2001 model rule (Pechan 2001, pg. 11) roughly 70 percent of the VOC emissions are accounted for in the area source inventory, while the remaining 30 percent is from equipment refueling vapor displacement and spillage that is accounted for in the nonroad inventory.

The emission benefits have been calculated for the emissions accounted for in both the area and nonroad source inventory. Emissions from the nonroad category were estimated to be 30 percent of the PFC emissions accounted for in the area source inventory.

Also note that the OTC baseline emissions (i.e., 2002 emissions) do not include changes to the emission estimation methodology made by CARB in 2004. CARB conducted a new survey of PFCs in 2004, which included kerosene containers and utility jugs. Using this survey data, CARB adjusted their baseline emissions; a similar adjustment to the OTC baseline inventory has not been made.

Estimated emission reductions were based on information compiled by CARB to support their recent amendments. CARB estimated that PFC emissions in 2015 will be 31.9 tpd in California with no additional controls or amendments to the 2000 PFC rules (CARB 2005a, pg. 10). CARB further estimates that the 2006 amendment will reduce emission from PFCs by 18.4 tpd in 2015 in California compared to the 2000 PFC regulations (CARB 2005a, pg. 23). Thus, at full implementation, the expected incremental reduction is approximately 58 percent, after an estimated 65 percent reduction from the original 2000 rule.

The OTC calculations assume that States will adopt the rule by July 2007 (except in Massachusetts) and provide manufacturers one year from the date of the rule to comply. Thus, new compliant PFCs will not be on the market until July 2008. Assuming a 10-year turnover to compliant cans, only 10 percent of the existing inventory of PFCs will comply with the new requirements in the summer of 2009. Therefore, only 10 percent of the full emission benefit estimated by CARB will occur by 2009 – the incremental reduction will be 5.8 percent in 2009.

3.4.4 Cost Estimates

CARB estimates that the cost-effectiveness of the 2005/2006 amendments will range from $0.40 to $0.70 per pound of VOC reduced, or $800 to $1,400 per ton of VOC reduced (CARB 2005a, pg. 27). Assuming CARBs costs for the OTR provides a conservative estimate, because some of the one-time research and reformulation costs incurred for products sold in California will not have to be incurred again for products sold in the OTR.

3.5 REGIONAL FUELS

The Clean Air Act Amendments of 1990 required significant changes to conventional fuels used by motor vehicles. Beginning in 1995, “reformulated” gasoline must be sold in certain non-attainment areas and other states with non-attainment areas are permitted to opt-in.

Reformulated gasoline results in lower VOC emissions than would occur from the use of normal "baseline" gasoline.

3.5.1 Existing Federal and State Rules

All but two states in the OTR are participating, in whole or in part, with the federal reformulated gasoline program. However, nearly one-third of the gasoline sold in the OTR is not reformulated gasoline. NESCAUM has estimated the following fraction of gasoline that is reformulated by State:

State	Current RFG Fraction	State	Current RFG Fraction
CT	100%	NJ	100%
DC	100%	NY	54%
DE	100%	PA	24%
MA	100%	RI	100%
MD	86%	NoVA	100%
ME	0%	VT	0%
NH	64%		

3.5.2 Description of the OTC 2006 Control Measure

The Energy Policy Act of 2005 provides the opportunity for the OTR to achieve a single clean-burning gasoline and is consistent with what OTR states have promoted through the long debate over MTBE/ethanol/RFG. Approximately one-third of the gasoline currently sold in the OTR is not reformulated. The new authority plus the potential for emission reductions from the amount of non-reformulated gasoline sold in the OTR provides an opportunity for additional emission reductions in the region as well as for a reduced number of fuels, and possibly a single fuel, to be utilized throughout the region. The OTC Commissioners recommended that the OTC member states pursue a region fuel program consistent with the Energy Act of 2005 (OTC 2006b).

3.5.3 Emission Benefit Analysis Methods

Emission benefits resulting from extending reformulated gasoline to all areas of the OTR have been calculated for 2006 by NESCAUM (NESCAUM 2006a).

3.5.4 Cost Estimates

According to USEPA's regulatory impact analysis for reformulated gasoline (USEPA 1993), the cost per ton of VOC reduced for Phase I RFG is $5,200 to $5,900. USEPA also estimated the

cost of Phase II RFG was $600 per ton of VOC reduced – this reflects the incremental cost over the cost of implementing Phase I of the RFG program.

3.6 VOC EMISSION REDUCTION SUMMARY

The results of the emission benefit calculations for the OTC states are described in this subsection. The starting point for the quantification of the emission reduction benefits is the MANEVU emission inventory, Version 3 (Pechan 2006, MACTEC 2006a) and the VISTAS emission inventory, BaseG (MACTEC 2006b), for the northern Virginia counties that are part of the OTR. The MANEVU and VISTAS inventories include a 2002 base year inventory as well as projection inventories for 2009 and 2018 (MANEVU also has projections for 2012, but VISTAS does not). The projection inventories account for growth in emissions based on growth indicators such as population and economic activity. The projection inventories also account for "on-the-books/on-the-way" (OTB/W) emission control regulations that have (or will) become effective between 2003 and 2008 that will achieve post-2002 emission reductions. For example, many States have already adopted the 2001 OTC model rules for consumer products and portable fuel containers. The emission reduction benefit from the 2001 OTC model rules are already accounted for in the MANEVU and VISTAS projection inventories. Emission reductions from existing regulations are already accounted for to ensure no double counting of emission benefits occurs.

Note that the emission reductions contained in this Section are presented in terms of tons per summer day. The MANEVU base and projection emission inventories do not contain summer day emissions for all States and source categories; the VISTAS inventory only contains annual values. When States provided summer day emissions in the MANEVU inventory, these values were used directly to quantify the emission benefit from the 2006 OTC control measure. When summer day emissions were missing from the MANEVU or VISTAS inventories, the summer day emissions were calculated using the annual emissions and the seasonal throughput data from the NIF Emission Process table. If the seasonal throughput data was missing, the summer day emissions were calculated using the annual emissions and a summer season adjustment factor derived from the monthly activity profiles contained in the SMOKE emissions modeling system.

Tables 3-5 to 3-10 show State summaries of the emission benefits from the OTC 2006 VOC control measures described previously in this Section. For each of the source categories, the Tables show four columns: (1) the actual 2002 summer daily emissions; (2) the summer daily emissions for the 2009 OTB/W scenario that accounts for growth and for the emission control regulations that have (or will) become effective between 2003 and 2008 that will achieve post-2002 emission reductions; (3) the summer daily emissions for 2009 with the implementation of

the OTC 2006 control measures identified in this Section, and (4) the emission benefit in 2009 resulting from the OTC 2006 control measure. Table 3-11 shows the same information for the total of all six source categories.

The largest estimated VOC emission reductions are in the most populous States – New York and Pennsylvania. The emission benefits listed for Virginia just include the Virginia counties in the northern Virginia area that are part of the OTR. Benefit estimates for all other States include the entire state. The emission benefits also assume that all OTC members will adopt the rules as described in the previous sections.

The requirement for a regional fuel throughout the OTR provides the largest emission benefit, about 139.4 tons per day across the OTR. The adhesives and sealants application model rule provides the second largest emission benefit in 2009 – 82.3 tons per day across the OTR. The incremental benefits accrued from the amendments to State's existing consumer products and portable fuel container model rules are not as large, since the States already have accrued substantial benefits from the adoption of these rules.

Appendix D provides county-by-county summaries of the VOC emission benefits from the OTC 2006 VOC model rules described previously in this Section. Appendix D also provides additional documentation regarding the data sources and emission benefit calculations that were performed. These tables can be used by the States to create additional summaries, for example, by nonattainment area.

Table 3-5 OTC 2006 VOC Model Rule Benefits by State for 2009 Adhesives and Sealants Application

State	Adhesives/Sealants Application Summer VOC Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	4.8	6.6	2.4	4.2
DE	1.4	1.6	0.6	1.0
DC	0.2	0.2	0.1	0.1
ME	3.1	3.9	1.4	2.5
MD	6.9	9.1	3.3	5.8
MA	10.6	14.7	5.8	8.9
NH	2.5	3.6	1.3	2.3
NJ	14.9	15.2	6.0	9.2
NY	24.7	33.4	11.9	21.5
PA	25.5	34.0	12.2	21.8
RI	1.8	2.4	0.9	1.5
VT	2.4	3.4	1.2	2.2
NOVA	1.2	1.6	0.6	1.0
OTR	**99.8**	**129.8**	**47.5**	**82.3**

2002 Actual emissions based on the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are based on the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Table 3-6 OTC 2006 VOC Model Rule Benefits by State for 2009 Cutback and Emulsified Asphalt Paving

State	Cutback and Emulsified Asphalt Paving Summer VOC Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT*	4.5	4.5	0.3	4.3
DE	0.1	0.1	0.1	0.0
DC	0.0	0.0	0.0	0.0
ME	8.6	10.6	0.0	10.6
MD	0.0	0.0	0.0	0.0
MA*	8.4	8.6	0.5	8.1
NH	3.8	4.8	0.5	4.4
NJ	4.9	4.8	0.1	4.7
NY	15.4	18.3	1.8	16.4
PA	7.7	9.3	0.9	8.4
RI	1.0	1.2	0.1	1.1
VT	1.4	1.8	0.0	1.8
NOVA	<0.1	<0.1	<0.1	<0.1
OTR	**55.9**	**64.0**	**4.3**	**59.8**

2002 Actual emissions based on the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are based on the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

* CT and MA provided revised emission estimates that differ from those in the MANEVU Version 3 inventories.

Table 3-7 OTC 2006 VOC Model Rule Benefits by State for 2009 Consumer Products

State	Consumer Products Summer VOC Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	40.1	35.4	34.7	0.7
DE	7.3	6.7	6.5	0.1
DC	5.7	5.1	5.0	0.1
ME	10.9	9.7	9.5	0.2
MD	52.8	48.4	47.4	1.0
MA*	62.2	64.1	53.9	10.2
NH	13.7	12.6	12.4	0.3
NJ	82.9	71.9	70.5	1.4
NY	209.6	183.3	179.6	3.7
PA	119.6	104.4	102.4	2.1
RI	10.6	9.3	9.1	0.2
VT	6.1	5.6	5.5	0.1
NOVA	21.5	23.0	22.5	0.5
OTR	**642.9**	**579.5**	**559.0**	**20.5**

2002 Actual emissions based on the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are based on the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

* MA proposed rule has a January 1, 2009 effective date and includes the VOC limits from the OTC 2001 model rule and those in the OTC 2006 model rule. The 2009 benefit for MA shows the benefit from both sets of limits. For all other States, the 2009 benefit shows the change in emissions from the OTC 2006 model rule only.

Table 3-8 OTC 2006 VOC Model Rule Benefits by State for 2009

Portable Fuel Containers – Area Sources

State	Portable Fuel Containers Summer VOC Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	9.7	6.5	6.1	0.4
DE	3.0	2.1	1.9	0.1
DC	3.6	2.5	2.4	0.1
ME	3.6	2.4	2.3	0.1
MD	39.6	24.5	23.1	1.4
MA*	18.1	18.6	16.9	1.7
NH	3.6	3.0	2.8	0.2
NJ	24.4	17.7	16.7	1.0
NY	76.6	45.0	42.4	2.6
PA	47.0	27.6	26.0	1.6
RI	3.0	2.7	2.5	0.2
VT	1.7	1.5	1.5	0.1
NOVA	8.6	6.1	5.7	0.4
OTR	**242.5**	**160.1**	**150.3**	**9.9**

2002 Actual emissions based on the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are based on the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Note: The table shows the estimated emission reduction that will occur in 2009; additional reductions will occur in later years as new, less-emitting PFCs that comply with the OTC 2006 control measure penetrate the market.

* MA PFC regulation will be based on only the OTC 2006 model rule (which updates the provisions of the OTC 2001 model rule) and will have an effective date of January 1, 2009. The 2009 base emissions in MA are uncontrolled emissions. The 2009 emission benefits represent the total emission reductions from the MA rule.

Table 3-9 OTC 2006 VOC Model Rule Benefits by State for 2009

Portable Fuel Containers – Nonroad Sources

State	Portable Fuel Containers Summer VOC Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	2.9	1.9	1.8	0.1
DE	0.9	0.6	0.6	0.0
DC	1.1	0.8	0.7	0.0
ME	1.1	0.7	0.7	0.0
MD	11.9	7.4	6.9	0.4
MA*	5.4	5.6	5.1	0.5
NH	1.1	0.9	0.8	0.1
NJ	7.3	5.3	5.0	0.3
NY	23.0	13.5	12.7	0.8
PA	14.1	8.3	7.8	0.5
RI	0.9	0.8	0.8	0.0
VT	0.5	0.5	0.4	0.0
NOVA	2.6	1.8	1.7	0.1
OTR	**72.8**	**48.0**	**45.1**	**3.0**

2002 Actual emissions estimated to be 30 percent of area source emissions (based on Pechan 2001, pg. 11)

2009 Base Inventory emissions estimated to be 30 percent of area source emissions, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Note: The table shows the estimated emission reduction that will occur in 2009; additional reductions will occur in later years as new, less-emitting PFCs that comply with the OTC 2006 control measure penetrate the market.

* MA PFC regulation will be based on only the OTC 2006 model rule (which updates the provisions of the OTC 2001 model rule) and will have an effective date of January 1, 2009. The 2009 base emissions in MA are uncontrolled emissions. The 2009 emission benefits represent the total emission reductions from the MA rule.

Table 3-10 OTC 2006 VOC Model Rule Benefits by State for 2009 Regional Fuels

State	Regional Fuels Summer VOC Emissions (tpd)			
	2006 Actual	2006 Base	2006 Control	2006 Benefit
CT	87.9	87.9	87.9	0.0
DE	26.6	26.6	26.6	0.0
DC	9.1	9.1	9.1	0.0
ME	56.2	56.2	47.1	9.1
MD	158.7	158.7	155.6	3.2
MA	148.6	148.6	148.6	0.0
NH	45.3	45.3	41.0	4.3
NJ	219.6	219.6	219.6	0.0
NY	465.0	465.0	408.1	56.9
PA	363.0	363.0	305.0	58.0
RI	22.2	22.2	22.2	0.0
VT	35.9	35.9	27.9	7.9
NOVA	54.9	54.9	54.9	0.0
OTR	**1693.1**	**1693.1**	**1553.7**	**139.4**

Note: NESCAUM analysis was only completed for 2006. Data for 2002 and 2009 are not currently available

Table 3-11 OTC 2006 VOC Model Rule Benefits by State for 2009
All Six VOC Categories

State	All Six Categories Summer VOC Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	149.9	142.9	133.2	9.7
DE	39.3	37.7	36.3	1.4
DC	19.6	17.6	17.2	0.4
ME	83.5	83.6	60.9	22.6
MD	270.0	248.1	236.3	11.8
MA	253.3	260.1	230.8	29.3
NH	70.0	70.3	58.8	11.5
NJ	354.1	334.6	317.9	16.7
NY	814.2	758.4	656.5	101.9
PA	576.8	546.7	454.3	92.3
RI	39.5	38.6	35.6	3.0
VT	48.0	48.7	36.5	12.1
NOVA	88.8	87.4	85.4	1.9
OTR	**2,807.0**	**2,674.6**	**2,359.8**	**314.8**

2002 Actual emissions based on the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions based on the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section. Assumes that 2009 reductions from RFG are the same as those calculated for 2006.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions). Assumes that 2009 reductions from RFG are the same as those calculated for 2006.

4.0 NOx ANALYSIS METHODS

This Section describes the analysis of the 2006 OTC control measures to reduce NOx emissions from six source categories: diesel engine chip reflash, regional fuels, asphalt production plants, cement kilns, glass/fiberglass furnaces, ICI boilers. For each of the categories, there are separate subsections that discuss existing Federal/state rules, summarize the requirements of the 2006 OTC control measure, describe the methods used to quantify the emission benefit, and provide an estimate of the anticipated costs and cost-effectiveness of the control measure. At the end of Section 4, we provide the estimated emissions for 2002 and 2009 by source category and State. Appendix E provides county-by-county summaries of the emission reductions for each of the categories.

4.1 HEAVY-DUTY TRUCK DIESEL ENGINE CHIP REFLASH

In the mid-1990s, the U.S. Department of Justice (DOJ), EPA, and CARB determined that seven major engine manufacturers had designed their 1993 through 1998 model heavy-duty diesel engines to operate with advanced electronic engine controls that resulted in excessive NOx emissions. when these engines were operated in the vehicle under "real world" conditions, the electronic calibration would change, altering the fuel delivery characteristics and resulting in elevated NOx levels. DOJ, EPA and ARB developed Consent Decrees that required the manufacturers to provide software (the "Low-NOx Rebuild Kit" or "chip reflash") that modifies the injection timing adjustment that caused the excess NOx emissions. The kits are to be installed at the time the vehicle is brought in for a major engine rebuild/overhaul. The rate of rebuild has been considerably lower than what was envisioned under the Consent Decrees; the primary reasons being that engine rebuilds occur at considerably higher elapsed vehicle mileage than what was contemplated when the Consent Decrees were negotiated, and there is no federal oversight program to ensure that individual rebuilds are occurring at the time of rebuild. In response to this low rebuild rate, CARB has adopted a mandatory program, not tied to the time of rebuild, but rather to a prescribed period of time, within which owners must bring their vehicles into the dealer to have the reflash operation performed, with all costs borne by the engine manufacturers. (NESCAUM 2006b).

4.1.1 Existing Federal and State Rules

California entered into Settlement Agreements, separate from the federal Consent Decrees, but with analogous requirements for low-NOx rebuilds. The slow rate of progress in

California mirrored the progress nationally. Accordingly, California embarked upon its own program, by rule, to accelerate and ultimately complete the rebuilds for trucks registered in California and for out-of-state registered trucks traveling on roadways within the state. The ARB rule, effective March 21, 2005, mandates that rebuilds occur over a prescribed time period, with a final rebuild compliance date of December 31, 2006. The CARB mandatory program faced two separate legal challenges, alleging that CARB has breached its settlement agreement and alleging that CARB is illegally establishing different emissions standards on "new engines". The Sacramento County Superior Court ruled that the Low NOx Software Upgrade Regulation is invalid. CARB indicates that it will not appeal that ruling and is suspending further enforcement of this regulation.

4.1.2 Description of the OTC 2006 Control Measure

NESCAUM developed a model rule for consideration by its member states to implement a low-NOx rebuild program, similar California's program. The regulation applies to the engine manufacturers and to owners, lessees, and operators of heavy-duty vehicles powered by the engines that are required to have the low-NOx rebuild. Consistent with the Consent Decrees, the engine manufacturers are required to provide the rebuild kits at no cost to dealers, distributors, repair facilities, rebuild facilities, owners, lessees, and operators, upon their request and to reimburse their authorized dealers, distributors, repair facilities and rebuild facilities for their labor costs.

4.1.3 Emission Benefit Analysis Methods

NESCUAM estimated potential NOx emissions reductions (tons per day) if the Northeast States were to adopt a rebuild program similar to the California program. These estimates are based on the ratio of Northeast to California in-state heavy-duty vehicle registrations, and ARB-estimated California NOx reductions of 35 TPD (NESCAUM 2006b, pg. 5). NESCAUM also estimated potential NOx emissions reductions for the Mid-Atlantic States by scaling the NESCAUM projections based on population. For the Mid-Atlantic States, the NOx benefit was calculated based on the per capita factors of a one ton per day reduction for each one million people (NESCAUM 2005).

4.1.4 Cost Estimates

The cost associated with the reflash has been estimated at $20-$30 per vehicle, which is borne by the engine manufacturer. There may be costs associated with potential downtime to the trucking firms, and record-keeping requirements on the dealer performing the reflash

and the vehicle owner. The MRPO estimated cost effectiveness to be $1,800 to $2,500 (depending on vehicle size) due to incremental "fuel penalty" of 2 percent increase in fuel consumption (ENVIRON 2006).

4.2 REGIONAL FUELS

The Clean Air Act Amendments of 1990 required significant changes to conventional fuels used by motor vehicles. Beginning in 1995, "reformulated" gasoline (RFG) must be sold in certain non-attainment areas and other states with non-attainment areas are permitted to opt-in. Reformulated gasoline results in lower VOC emissions than would occur from the use of normal "baseline" gasoline. Phase II of the RFG program began in 2000.

4.2.1 Existing Federal and State Rules

All but two states in the OTR are participating, in whole or in part, with the federal RFG program. However, nearly one-third of the gasoline sold in the OTR is not RFG. NESCAUM has estimated the following fraction of gasoline that is reformulated by State:

State	Current RFG Fraction	State	Current RFG Fraction
CT	100%	NJ	100%
DC	100%	NY	54%
DE	100%	PA	24%
MA	100%	RI	100%
MD	86%	NoVA	100%
ME	0%	VT	0%
NH	64%		

4.2.2 Description of the OTC 2006 Control Measure

The Energy Policy Act of 2005 provides the opportunity for the OTR to achieve a single clean-burning gasoline and is consistent with what OTR states have promoted through the long debate over MTBE/ethanol/RFG. Approximately one-third of the gasoline currently sold in the OTR is not reformulated. The new authority plus the potential for emission reductions from the amount of non-reformulated gasoline sold in the OTR provides an opportunity for additional emission reductions in the region as well as for a reduced number of fuels, and possibly a single fuel, to be utilized throughout the region. The OTC Commissioners recommended that the OTC member states pursue a region fuel program consistent with the Energy Act of 2005 (OTC 2006b).

4.2.3 Emission Benefit Analysis Methods

Emission benefits resulting from extending reformulated gasoline to all areas of the OTR have been calculated for 2006 by NESCAUM (NESCAUM 2006a).

4.2.4 Cost Estimates

According to USEPA's regulatory impact analysis for reformulated gasoline (USEPA 1993), the cost per ton of NOx reduced for Phase II RFG is $5,200 to $3,700.

4.3 ASPHALT PAVEMENT PRODUCTION PLANTS

Hot mix asphalt (HMA) is created by mixing and heating size-graded, high quality aggregate (which can include reclaimed asphalt pavement) with liquid asphalt cement. HMA can be manufactured by batch mix, continuous mix, parallel flow drum mix, or counterflow drum mix plants. The dryer operation is the main source of pollution at hot mix asphalt manufacturing plants. Dryer burner capacities are usually less than 100 mmBtu/hr, but may be as large as 200 mmBtu/hr. Natural gas is the preferred source of heat used by the industry, although oil, electricity and combinations of fuel and electricity are used. The reaction of nitrogen and oxygen in the dryer creates nitrogen oxide (NOx) emissions in the combustion zone,

4.3.1 Existing Federal and State Rules

Only two of the OTR states have regulations that specifically address NOx emissions from asphalt pavement manufacturing plants. New Hampshire limits NOx emissions to 0.12 pound per ton of asphalt produced, or 0.429 lb per mmBtu {Chapter Env-A 1211.08 (c)} for units greater than 26 mmBTU/hour in size. New Jersey limits NOx emissions to 200 ppmvd at seven percent oxygen {7:27-19.9(a)}. Asphalt plants in other OTR states are subject to more general fuel combustion requirements or case-by-case RACT determinations.

4.3.2 Description of the OTC 2006 Control Measure

NOx emissions from asphalt plants can be reduced through installation of low-NOx burners and flue gas recirculation (FGR). The OTC Commissioners recommended that OTC member states pursue as necessary and appropriate state-specific rulemakings or other implementation methods to establish emission reduction percentages, emission rates or technologies that are consistent with the guidelines shown in Table 4.1 (OTC 2006b).

Table 4.1 Addendum to OTC Resolution 06-02 Emission Guidelines for Asphalt Plants

Plant Type	**Emission Rate (lbs NOx/ton asphalt produced)**	**% Reduction**
Area/Point Sources		
Batch Mix Plant – Natural Gas	0.02	35
Batch Mix Plant – Distillate/Waste Oil	0.09	35
Drum Mix Plant – Natural Gas	0.02	35
Drum Mix Plant – Distillate/Waste Oil	0.04	35
or Best Management Practices		

Industry leaders have identified a number of Best Management Practices that allow for substantial reduction in plant fuel consumption and the corresponding products of combustion including NOx. Best management practices include:

- **Burner tune-ups**: A burner tune-up may reduce NOx emissions by up to 10 percent and may also help reduce fuel consumption. In other words, there can be a direct pay-back to the business from regular burner tune-ups.

- **Effective stockpile management to reduce aggregate moisture content**: Current information indicates that effective stockpile management can reduce aggregate moisture content by about 25 percent, corresponding to a reduction in fuel consumption by approximately 10 - 15 percent. There are a number of ways to reduce aggregate moisture: covering stockpiles, paving under stockpiles, and sloping stockpiles are all ways that prevent aggregate from retaining moisture. Best Practices are plant- and geographic locale-specific.

- **Lowering mix temperature**: A Technical Working Group of FHWA is currently investigating a number of newer formulation technologies, to understand the practicality and performance of lowering mix temperatures. Substantial reductions in mix temperatures, on the order of 20 percent or more, appear to be plausible. Lowering mix temperatures, by this amount, may reduce fuel consumption, as less heat is needed to produce the mix.

- **Other maintenance and operational best practices**: Additional practices can be employed throughout the plant to help optimize production and operations. For example, regular inspection of drum mixing flites and other measures can be taken – all in the effort to make a plant operate more efficiently, thereby using less fuel.

4.3.3 Emission Benefit Analysis Methods

The emission rates and percent reductions estimates shown above for major sources were developed the state of New York based on the use of low-NOx burners and FGR. For minor sources, the requirement is the use of low-NOx burner technology. NOx emissions can be reduced by 35 to 50 percent with low-NOx burners and FGR, and by 25 to 40 percent with low-NOx burners alone. For modeling purposes, a 35 percent reduction was assumed to apply all types of asphalt plants.

The reductions estimated for this category only include emissions included in the MANEVU point source emission inventory. Only emissions from major point sources are typically included in the MANEVU point source database. Emissions from non-major sources are not explicitly contained in the area source inventory. The emissions from non-major asphalt plants are likely lumped together in the general area source industrial and commercial fuel use category. Reductions from area source emissions at asphalt production plants are included in the ICI boiler source category. Therefore, there is some uncertainty regarding the actual reductions that will occur as no accurate baseline exists for both major and minor facilities.

4.3.4 Cost Estimates

The anticipate costs for control are similar to those of small to midsize boilers or process heaters. Low NOx burners range from $500 to $1,250 per ton and low-NOx burners in combination with FGR range from $1,000 to $2,000 per ton. These cost-effectiveness data were provided by NYSDEC. These control efficiencies and cost-effectiveness estimates for low-NOx burners plus FGR are generally consistent EPA's published data for small natural gas-fired and oil-fired process heaters and boilers (Pechan 2005).

4.4 CEMENT KILNS

Portland cement manufacturing is an energy intensive process in which cement is made by grinding and heating a mixture of raw materials such as limestone, clay, sand and iron ore in a rotary kiln. Nationwide, about 82 percent of the industry's energy requirement is provided by coal. Waste-derived fuels (such as scrap tires, used motor oils, surplus printing inks, etc.) provide about 14 percent of the energy. NOx emissions are generated during fuel combustion by oxidation of chemically-bound nitrogen in the fuel and by thermal fixation of nitrogen in the combustion air.

There are four main types of kilns used to manufacture portlant cement: long wet kilns, long dry kilns, dry kilns with preheaters, dry kilns with precalciners. Wet kilns tend to be older units and are often located where the moisture content of feed materials from quarries tends to be high.

Cement kilns are located in Maine, Maryland, New York, and Pennsylvania. There are no cement kilns in the other OTR states. According to the MANEVU 2002 inventory (Pechan 2006), the number of cement kilns operating in 2002 by size and type was:

State	Number of Facilities	Number of Long Wet Kilns	Number of Long Dry Kilns	Number of Preheater or Precalciner Kilns
Maine	1	1	0	0
Maryland	3	2	2	0
New York	3	2	1	0
Pennsylvania	10	5	11	5

4.4.1 Existing Federal and State Rules

The NOx SIP Call required states to submit revisions to their SIPs to reduce the contribution of NOx from cement kilns. All kilns in the OTR, except for the one kiln in Maine, are subject to the NOx SIP Call. Based on its SIP Call analysis, EPA determined 30 percent reduction of baseline uncontrolled emission levels was highly cost-effective for cement kilns emitting greater than 1 ton/day of NOx. Some states elected to include cement kilns in their NOx Budget Trading Programs. For example, requirements in Pennsylvania's regulations in 25 Pa. Code Chapter 145 set a kiln allowable limit of 6 pounds per ton of clinker produced, and require sources to purchase NOx allowances for each ton of NOx actual emissions that exceed the allowable limits. Maryland did not include kilns in the trading program but instead provided two options for reducing NOx emissions:

- Option 1 – for long wet kilns, meet NOx emission limit of 6.0 pounds per ton of clinker produced; for long dry kilns, meet limit of 5.1 pounds per ton of clinker produced; and for pre-heater/pre-calciner or pre-calciner kilns, meet limit of 2.8 pounds per ton of clinker produced;
- Option 2 – install low NOx burners on each kiln or modify each kiln to implement mid-kiln firing.

The one kiln in Maine is a wet process cement kiln and has been licensed to modernize by converting to the more efficient dry cement manufacturing process. The new kiln is subject to BACT requirements.

4.4.2 Description of the OTC 2006 Control Measure

There is a wide variety of proven control technologies for reducing NOx emissions from cement kilns. Automated process control has been shown to lower NOx emissions by moderate amounts. Low-NOx burners have been successfully used, especially in the precalciner kilns. CemStarSM is a process that involves adding steel slag to the kiln, offering moderate levels of NOx reduction by reducing the required burn zone heat input. Mid-kiln firing of tires provides moderate reductions of NOx emissions while reducing fuel costs and providing an additional revenue stream from receipt of tire tipping fees. SNCR technology has the potential to offer significant reductions on some precalciner kilns. SNCR is being used in numerous cement kilns in Europe. A recent study (EC 2001a) indicates that there are 18 full-scale SNCR installations in Europe. Most SNCR installations are designed and/or operated for NOx reduction rates of 10-50% which is sufficient to comply with current legislation in some countries. Two Swedish plants installed SNCR in 1996/97 and have achieved a reduction of 80-85%. A second recent study (ERG 2005) of cement kilns in Texas has identified a variety of NOx controls for both wet and dry cement kilns, with reductions in the 40 to 85% range.

The OTC Commissioners recommended that OTC member states pursue, as necessary and appropriate, state-specific rulemakings or other implementation methods to establish emission reduction percentages, emission rates or technologies that are consistent with the guidelines shown in Table 4.2 (OTC 2006b). The guidelines were presented in terms of both an emission rate (lbs/ton of clinker by kiln type) as well as a percent reduction from uncontrolled levels.

Table 4.2 OTC Resolution 06-02 Emission Guidelines for Cement Kilns

Kiln Type	Emission Rate (lbs NOx/ton of clinker produced)	% Reduction from Uncontrolled
Wet Kiln	3.88	60
Long Dry Kiln	3.44	60
Pre-heater Kiln	2.36	60
Pre-calciner Kiln	1.52	60

4.4.3 Emission Benefit Analysis Methods

To calculate the additional reductions from the OTC 2006 Control Measure, MACTEC calculated the 2002 emission rate (lbs NOx per ton of clinker produced) for each kiln. The 2002 emission rate was compared to the OTC 2006 control measure emission rate list above to calculate a kiln-specific percent reduction. The kiln-specific percent reduction was then applied to the 2002 actual emissions to calculate the emissions remaining after implementation of the control measure.

4.4.4 Cost Estimates

The TCEQ study (ERG 2005) estimated a cost-effectiveness of $1,400-1,600 per ton of NOx removed for an SNCR system achieving a 50 percent reduction on modern dry preheat precalcination kilns. The study also estimate a cost-effectiveness of $2,200 per ton of NOx removed for SNCR systems achieving a 35 percent reduction on wet kilns. The most recent EPA report (EC/R 2000) shows data for two SNCR technologies, biosolids injection and NOXOUT®. These technologies showed average emission reductions of 50 and 40 percent, respectively. The cost effectiveness was estimated to be $1,000-2,500/ton depending on the size of the kiln. Costs and the cost effectiveness for a specific unit will vary depending on the kiln type, characteristics of the raw material and fuel, uncontrolled emission rate, and other source-specific factors.

4.5 GLASS/FIBERGLASS FURNACES

The manufacturing process requires raw materials, such as sand, limestone, soda ash, and cullet (scrap and recycled glass), be fed into a furnace where a temperature is maintained in the 2,700°F to 3,100°F range. The raw materials then chemically react creating a molten material, glass. The reaction of nitrogen and oxygen in the furnace creates NOx emissions.

The main product types are flat glass, container glass, pressed and blown glass, and fiberglass. In the OTR, the preponderance of glass manufacturing plants is in Pennsylvania. New York and New Jersey also have several plants. Massachusetts, Maryland, and Rhode Island each have one glass manufacturing plant.

4.5.1 Existing Federal and State Rules

Only Massachusetts and New Jersey have specific regulatory limits for NOx emissions from glass melting furnaces. Massachusetts has a 5.3 pound per ton of glass removed limit for container glass melting furnaces having a maximum production of 15 tons of glass per

day or greater. New Jersey has a 5.5 pound per ton of glass limit for commercial container glass manufacturing furnaces and an 11 pound per ton of glass for specialty container glass manufacturing furnaces. New Jersey also required borosilicate recipe glass manufacturing furnaces to achieve at least a 30 percent reduction from 1990 baseline levels by 1994. The regulations for other states with glass furnaces (Maryland, New York, Pennsylvania, and Rhode Island) do not contain specific emission limitation requirements, but rather require RACT emission controls as determined on a case-by-case basis.

4.5.2 Description of the OTC 2006 Control Measure

Several alternative control technologies are available to glass manufacturing facilities to limit NOx emissions (MACTEC 2005). These options include combustion modifications (low NOx burners, oxy-fuel firing, oxygen-enriched air staging), process modifications (fuel switching, batch preheat, electric boost), and post combustion modifications (fuel reburn, SNCR, SCR). Oxyfiring is the most effective NOx emission reduction technique and is best implemented with a complete furnace rebuild. This strategy not only reduces NOx emissions by as much as 85 percent, but reduces energy consumption, increases production rates by 10-15 percent, and improves glass quality by reducing defects. Oxyfiring is demonstrated technology and has penetrated into all segments of the glass industry.

The OTC Commissioners recommended that OTC member states pursue, as necessary and appropriate, state-specific rulemakings or other implementation methods to establish emission reduction percentages, emission rates or technologies that are consistent with the guidelines shown in Table 4.3 (OTC 2006g). The guidelines were presented in terms of both an emission rate (lbs/ton of glass produced) as well as a percent reduction from uncontrolled levels for the different types of glass manufactured.

Table 4.3 Addendum to OTC Resolution 06-02 Guidelines for Glass Furnaces

Type of Glass	**Emission Rate (lbs NOx/ton of glass pulled) Block 24-hr Ave.**	**Emission Rate (lbs NOx/ton of glass pulled) Rolling 30-day Ave.**
Container Glass	4.0	n/a
Flat Glass	9.2	7.0
Pressed/blown Glass	4.0	n/a
Fiberglass	4.0	n/a

Note: Compliance date is 2009. NOx allowances may be surrendered in lieu of meeting the emission rate based on a percentage of the excess emissions at the facility, at the discretion of the State.

4.5.3 Emission Benefit Analysis Methods

The NOx emission reduction benefit calculation varied by State depending upon the availability of data:

- New Jersey DEP evaluated the existing controls at each facility. NJDEP identified furnaces that have closed, indicated whether the facility requested banking of emissions, and specified whether the emissions from the closed furnace should remain in the projection year inventory. NJDEP also identified furnace-specific projected emission rates based on the use of oxyfuel technology.
- Pennsylvania DEP provided 2002 throughput (tons of glass pulled) and emission rate data (lbs NOx/ton of glass pulled). The 2002 emission rate was compared to the OTC 2006 control measure emission rate list above to calculate a furnace-specific percent reduction. The furnace-specific percent reduction was then applied to the 2002 actual emissions to calculate the emissions remaining after implementation of the control measure. If a furnace had an emission rate below the OTCC 2006 control measure emission rate, then no incremental reduction was calculated. PADEP also identified several furnaces that have shut down – emissions from these furnaces were set to zero in the projection year inventory.
- For all other States with glass furnaces (MA, MD, NY, and RI), furnace specific data were not available. The NOx emission reduction benefit was calculated by applying an 85 percent reduction for oxyfiring technology to the projected 2009 base inventory. This approach does not take into account existing controls at the facilities.

4.5.4 Cost Estimates

A recent study by the European Commission (EC 2001b) reports a 75 to 85 percent reduction in NOx based on oxyfiring technology, resulting in emission rates of 1.25 to 4.1 pounds of NOx per ton of glass produced. The cost effectiveness was determined to be $1,254 to $2,542 depending on the size of the furnace. EPA's Alternative Control Techniques Document (USEPA 1994) estimated an 85 percent reduction in NOx emissions for oxyfiring with a cost-effectiveness of $2,150 to $5,300.

Other technologies may be used to meet the limits in Table 4.3. The costs associated with meeting those limits are source-specific and depend on the existing controls in place and the emission rates being achieved. Site-specific factors greatly influence the actual achievable performance level and control costs at a particular facility.

4.6 ICI BOILERS

Industrial/commercial/institutional (ICI) boilers combust fuel to produce heat and process steam for a variety of applications. Industrial boilers are routinely found in applications the chemical, metals, paper, petroleum, food production and other industries. Commercial and institutional boilers are normally used to produce steam and heat water for space heating in office buildings, hotels, apartment buildings, hospitals, universities, and similar facilities. Industrial boilers are generally smaller than boilers in the electric power industry, and typically have a heat input in the 10-250 mmBtu/hr range; however, industrial boilers can be as large as 1,000 mmBtu/hr or as small as 0.5 mmBtu/hour. Most commercial and institutional boilers generally have a heat input less than 100 mmBtu/hour. It is estimated that 80 percent of the commercial/institutional population is smaller than 15 mmBtu/hour. The ICI boiler population is highly diverse – encompassing a variety of fuel types, boiler designs, capacity utilizations and pollution control systems – that result in variability in emission rates and control options.

For emission inventory purposes, emissions from ICI boilers are included in both the point and area source emission inventories. Generally, the point source emission inventory includes all ICI boilers at major facilities. The point source inventory lists individual boilers, along with their size and associated emissions. The area source inventory generally includes emissions for ICI boilers located at non-major facilities. It does not provide emissions by the size of boiler, as is done in the point source inventory. Area sources emissions are calculated based on the fuel use not accounted for in the point source inventory. This is done by taking the total fuel consumption for the state (by fuel type and category), as published by the U.S. Department of Energy, and subtracting out the fuel usage reported in the point source inventory. Emissions are then calculated on a county-by-county basis using the amount of fuel not accounted for in the point source inventory and average emission factors for each fuel type.

4.6.1 Existing Federal and State Rules

ICI boilers are subject to a variety of Clean Air Act programs. Emission limits for a specific source may have been derived from NSPS, NSR, NOx SIP Call, State RACT rules, case-by-case RACT determinations, or MACT requirements. Thus, the specific emission limits and control requirements for a given ICI boiler vary and depend on fuel type, boiler age, boiler size, boiler design, and geographic location.

The OTC developed a draft model rule in 2001 with the following thresholds and limits:

OTC 2001 Model Rule ICI Boiler Thresholds and Limits		
Applicability Threshhold	**Emission Rate Limit**	**Percent NOx Reduction**
5-50 mmBtu/hr	None	Tune-up Only
50-100 mmBtu/hr	Gas-fired: 0.10 lbs/mmBtu Oil-fired: 0.30 lbs/mmBtu Coal-fired: 0.30 lbs/mmBtu	50%
100-250 mmBtu/hr	Gas-fired: 0.10 lbs/mmBtu Oil-fired: 0.20 lbs/mmBtu Coal-fired: 0.20 lbs/mmBtu	50%
>250 mmBtu/hr*	Gas-fired: 0.17 lbs/mmBtu Oil-fired: 0.17 lbs/mmBtu Coal-fired: 0.17 lbs/mmBtu	50%

* Only for boilers not subject to USEPA's NOx SIP Call

Implementation of the OTC 2001 model rule limits varied by State – some OTC states adopted these limits while others did not. MACTEC researched current State regulations affecting ICI boilers and summarized the rules in Appendix F. The specific requirements for each state were organized into a common format to efficiently include the State-by-State differences by fuel type and boiler size. This organization oversimplifies the source categories and size limitations that differ from State-to-State. This simplification was necessary to match the rules to the organization of the emission data bases (i.e., Source Classification Codes) being used in the analysis.

4.6.2 Description of the OTC 2006 Control Measure

The OTC Commissioners recommended that OTC member states pursue as necessary and appropriate state-specific rulemakings or other implementation methods to establish emission reduction percentages, emission rates or technologies for ICI boilers (OTC 2006b). These guidelines have undergone revision based on a more refined analyses. Table 4.4 provides the current OTC proposal for ICI boilers.

4.6.3 Emission Benefit Analysis Methods

The emission reduction benefits resulting from the OTC ICI boiler control measure were calculated differently for point and area sources. For point sources, the emission reductions were estimated by comparing the emission limits in the existing (2006) state regulations with the limits contained in the OTC ICI boiler proposal.

Table 4.4 Addendum to OTC Resolution 06-02 Guidelines for ICI Boilers

ICI Boiler Size (mmBtu/hr)	Control Strategy/ Compliance Option	NOx Control Measure
5-25		Annual Boiler Tune-Up
25-100	Option #1	Natural Gas: 0.05 lb NOx/mmBtu #2 Fuel Oil: 0.08 lb NOx/mmBtu #4 or #6 Fuel Oil: 0.20 lb NOx/mmBtu Coal: 0.30 lb NOx/mmBtu**
	Option #2	50% reduction in NOx emissions from uncontrolled baseline
	Option #3	Purchase current year CAIR NOx allowances equal to reducted needed to acheiv the required emission rates
100-250	Option #1	Natural Gas: 0.10 lb NOx/mmBtu #2 Fuel Oil: 0.20 lb NOx/mmBtu #4 or #6 Fuel Oil: 0.20 lb NOx/mmBtu Coal: Wall-fired 0.14 lb NOx/mm Btu Tangential 0.12 lb NOx/mm Btu Stoker 0.22 lb NOx/mm Btu Fluidized Bed 0.08 lb NOx/mm Btu
	Option #2	LNB/SNCR, LNB/FGR, SCR, or some combination of these controls in conjunction with Low NOx Burner technology
	Option #3	60% reduction in NOx emissions from uncontrolled baseline
	Option #4	Purchase current year CAIR NOx allowances equal to reducted needed to acheiv the required emission rates
>250	Option #1	Purchase current year CAIR NOx allowances equal to reducted needed to acheiv the required emission rates
	Option #2	Phase I – 2009 Emission rate equal to EGUs of similar size Phase II – 2012 Emission rate equal to EGUs of similar size

Tables 4-5 through 4-10 shows the current state emission limits by size range and fuel type, and the percentage reduction from the OTC proposed limits to the current state requirement. In cases where a state did not have a specific limit for a given size range, then the more general percent reduction from uncontrolled values in Table 4-4 was used. The fuel types/boiler types shown in Tables 4-5 through 4-10 were matched to SCCs in the point source inventory. MACTEC used the SCC and design capacity (mmBtu/hour) from the MANEVU and VISTAS emission inventories to apply the appropriate state specific reduction factor to estimate the emission reduction benefit.

The emission limits shown in Tables 4-5 through 4-10 generally apply only to ICI boilers located at major sources (i.e. point sources). ICI boilers located at minor sources (i.e., area sources) are generally not subject to the emissions limits. In general, emissions from area source ICI boilers are uncontrolled (except possibly for an annual tune-up requirement). The one exception is New Jersey: beginning on March 7, 2007, N.J.A.C. 27.27-19.2 requires any ICI boiler of at least 5 mmBtu/hr heat input to comply with applicable NOx emission limits whether or not it is located at a major NOx facility.

To calculate the reductions from area source ICI boilers, MACTEC applied the general percent reduction from uncontrolled values in Table 4-4 to the area source inventory (i.e., 10 percent reduction for annual tune-ups for boilers < 25 mmBtu/hr, and a 50 percent reduction for boilers between 25 and 100 mmBtu/hr).

The area source inventory does not provide information on the boiler size. To estimate the boiler size distribution in the area source inventory, we first assumed that there were no boilers > 100 mmBtu/hr in the area source inventory. Next, we used boiler capacity data from the USDOE's Oak Ridge National Laboratory (EEA 2005) to estimate the percentage of boiler capacity in the < 25 mm Btu/hr and 25-100 mm Btu/hr categories. Third, we assumed that emissions were proportional to boiler capacity. Finally, we calculated the weighted average percent reduction for area source ICI boilers based on the capacity in each size range and the percent reduction by size range discussed in the previous paragraph. For industrial boilers, the weighted average reduction was 34.5 percent; for commercial/institutional boilers, the weighted average reduction was 28.1 percent.

Table 4.5 Current State Emission Limits and Percent Reduction Estimated from Adoption of OTC ICI Boiler Proposal

Point Source Natural Gas-Fired Boilers

	Current 2006 NOx RACT Limit (lbs/mmBtu) (from State regulations) Applicability Threshold mmBtu/hour Heat Input						**OTC 2006 Percent Reduction (Current State reg compared to OTC Limit) Applicability Threshold mmBtu/hour Heat Input**				
State	**> 250***	**100 to 250**	**50 to 100**	**25 to 50**	**5 to 25**		**> 250***	**100 to 250**	**50 to 100**	**25 to 50**	**<25**
						OTC Limits (lbs/mmBtu):	**0.12**	**0.10**	**0.05**	**0.05**	**NL**
CT	0.20	0.20	0.20	0.20	0.20		40.0	50.0	75.0	75.0	10.0
DE	0.10	0.10	LNB	NL	NL		0.0	0.0	0.0	0.0	0.0
DC	0.20	0.20	NL	NL	NL		40.0	50.0	50.0	50.0	10.0
ME	0.20	NL	NL	NL	NL		40.0	60.0	50.0	50.0	10.0
MD	0.20	0.20	0.20	0.20	0.20		40.0	50.0	75.0	75.0	10.0
MA	0.20	0.20	0.10	NL	NL		40.0	50.0	50.0	50.0	10.0
NH	0.10	0.10	0.10	NL	NL		0.0	0.0	50.0	50.0	10.0
NJ	0.10	0.10	0.10	NL	NL		0.0	0.0	50.0	50.0	10.0
NY	0.20	0.20	0.10	NL	NL		40.0	50.0	50.0	50.0	10.0
PA	Source Specific NOx RACT						29.4	50.0	50.0	50.0	10.0
SE PA	0.17	0.10	Source Specific RACT				29.4	0.0	50.0	50.0	10.0
RI	0.10	0.10	0.10	NL	NL		0.0	0.0	50.0	50.0	10.0
VT	0.20	NL	NL	NL	NL		40.0	60.0	50.0	50.0	10.0
NOVA	0.2	0.2	0.2	0.2	0.2		40.0	50.0	75.0	75.0	10.0

NL indicates no limit specified in a state rule; in those cases, the more general percent reduction from Table 4-4 was used.

Source Specific NOx RACT indicates that there are no specific limits in the States' rule (i.e., limits were determined on a case-by-case basis); in those cases, the more general percent reduction from Table 4-4 was used.

SE PA refers to the five southeastern Pennsylvania counties (Bucks, Chester, Delaware, Montgomery, and Philadelphia) affected by Pennsylvania's Addition NOx Requirements (129.201)

NOVA refers to the following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

Table 4.6 Current State Emission Limits and Percent Reduction Estimated from Adoption of OTC ICI Boiler Proposal

Point Source Distillate Oil-Fired Boilers

State	Current 2006 NOx RACT Limit (lbs/mmBtu) (from State regulations) Applicability Threshold mmBtu/hour Heat Input						OTC 2006 Percent Reduction (Current State reg compared to OTC Limit) Applicability Threshold mmBtu/hour Heat Input				
	> 250*	100 to 250	50 to 100	25 to 50	5 to 25		> 250*	100 to 250	50 to 100	25 to 50	<25
						OTC Limits (lbs/mmBtu):	**0.12**	**0.20**	**0.08**	**0.08**	**NL**
CT	0.20	0.20	0.20	0.20	0.20		40.0	0.0	60.0	60.0	10.0
DE	0.10	0.10	LNB	NL	NL		0.0	0.0	0.0	0.0	0.0
DC	0.30	0.30	0.30	NL	NL		60.0	33.3	73.3	50.0	10.0
ME	0.20	0.30	0.30	NL	NL		40.0	33.3	73.3	50.0	10.0
MD	0.25	0.25	0.25	0.25	0.25		52.0	20.0	68.0	68.0	10.0
MA	0.25	0.30	0.12	NL	NL		52.0	33.3	33.3	50.0	10.0
NH	0.30	0.30	0.12	NL	NL		60.0	33.3	33.3	50.0	10.0
NJ	0.20	0.20	0.12	NL	NL		40.0	0.0	33.3	50.0	10.0
NY	0.25	0.30	0.12	NL	NL		52.0	33.3	33.3	50.0	10.0
PA	Source Specific NOx RACT						29.4	33.3	33.3	50.0	10.0
SE PA	0.17	0.20	Source Specific RACT				29.4	0.0	33.3	50.0	10.0
RI	0.12	0.12	0.12	NL	NL		0.0	0.0	33.3	50.0	10.0
VT	0.30	NL	NL	NL	NL		60.0	60.0	50.0	50.0	10.0
NOVA	0.25	0.25	0.25	0.25	0.25		52.0	20.0	68.0	68.0	10.0

NL indicates no limit specified in a state rule; in those cases, the more general percent reduction from Table 4-4 was used.

Source Specific NOx RACT indicates that there are no specific limits in the States' rule (i.e., limits were determined on a case-by-case basis); in those cases, the more general percent reduction from Table 4-4 was used.

SE PA refers to the five southeastern Pennsylvania counties (Bucks, Chester, Delaware, Montgomery, and Philadelphia) affected by Pennsylvania's Addition NOx Requirements (129.201)

NOVA refers to the following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

Table 4.7 Current State Emission Limits and Percent Reduction Estimated from Adoption of OTC ICI Boiler Proposal

Point Source Residual Oil-Fired Boilers

State	Current 2006 NOx RACT Limit (lbs/mmBtu) (from State regulations) Applicability Threshold mmBtu/hour Heat Input						OTC 2006 Percent Reduction (Current State reg compared to OTC Limit) Applicability Threshold mmBtu/hour Heat Input				
	> 250*	100 to 250	50 to 100	25 to 50	5 to 25		> 250*	100 to 250	50 to 100	25 to 50	<25
						OTC Limits (lbs/mmBtu):	**0.12**	**0.20**	**0.20**	**0.20**	**NL**
CT	0.25	0.25	0.25	0.25	0.25		52.0	20.0	20.0	20.0	10.0
DE	0.10	0.10	LNB	NL	NL		0.0	0.0	0.0	0.0	0.0
DC	0.30	0.30	0.30	NL	NL		60.0	33.3	33.3	50.0	10.0
ME	0.20	0.30	0.30	NL	NL		40.0	33.3	33.3	50.0	10.0
MD	0.25	0.25	0.25	0.25	0.25		52.0	20.0	20.0	20.0	10.0
MA	0.25	0.30	0.30	NL	NL		52.0	33.3	33.3	50.0	10.0
NH	0.30	0.30	0.30	NL	NL		60.0	33.3	33.3	50.0	10.0
NJ	0.20	0.20	0.30	NL	NL		40.0	0.0	33.3	50.0	10.0
NY	0.25	0.30	0.30	NL	NL		52.0	33.3	33.3	50.0	10.0
PA	Source Specific NOx RACT						29.4	33.3	33.3	50.0	10.0
SE PA	0.17	0.20	Source Specific RACT				29.4	0.0	50.0	50.0	10.0
RI	LNB/FGR	LNB/FGR	LNB/FGR	NL	NL		0.0	0.0	0.0	50.0	10.0
VT	0.30	NL	NL	NL	NL		60.0	60.0	50.0	50.0	10.0
NOVA	0.25	0.25	0.25	0.25	0.25		52.0	20.0	20.0	20.0	10.0

NL indicates no limit specified in a state rule; in those cases, the more general percent reduction from Table 4-4 was used.

Source Specific NOx RACT indicates that there are no specific limits in the States' rule (i.e., limits were determined on a case-by-case basis); in those cases, the more general percent reduction from Table 4-4 was used.

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NOVA refers to the following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

Table 4.8 Current State Emission Limits and Percent Reduction Estimated from Adoption of OTC ICI Boiler Proposal

Point Source Coal Wall-Fired Boilers

State	Current 2006 NOx RACT Limit (lbs/mmBtu) (from State regulations) Applicability Threshold mmBtu/hour Heat Input						OTC 2006 Percent Reduction (Current State reg compared to OTC Limit) Applicability Threshold mmBtu/hour Heat Input				
	> 250*	100 to 250	50 to 100	25 to 50	5 to 25		> 250*	100 to 250	50 to 100	25 to 50	<25
						OTC Limits (lbs/mmBtu):	**0.12**	**0.14**	**0.30**	**0.30**	**NL**
CT	0.38	0.38	0.38	0.38	0.38		68.4	63.2	21.1	21.1	10.0
DE	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
DC	0.43	0.43	NL	NL	NL		72.1	67.4	50.0	50.0	10.0
ME	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
MD	0.38	0.65	0.38	0.38	0.38		68.4	78.5	21.1	21.1	10.0
MA	0.45	0.45	NL	NL	NL		73.3	68.9	50.0	50.0	10.0
NH	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NJ	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NY	0.45	0.5	NL	NL	NL		73.3	72.0	50.0	50.0	10.0
PA	Source Specific NOx RACT						29.4	72.0	50.0	50.0	10.0
SE PA	0.17	0.20	Source Specific RACT				29.4	30.0	50.0	50.0	10.0
RI	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
VT	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NOVA	0.38	0.38	0.38	0.38	0.38		68.4	63.2	21.1	21.1	10.0

n/a indicates that there are no coal-fired ICI boilers in the state.

NL indicates no limit specified in a state rule; in those cases, the more general percent reduction from Table 4-4 was used.

Source Specific NOx RACT indicates that there are no specific limits in the States' rule (i.e., limits were determined on a case-by-case basis); in those cases, the more general percent reduction from Table 4-4 was used.

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NOVA refers to the following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

Table 4.9 Current State Emission Limits and Percent Reduction Estimated from Adoption of OTC ICI Boiler Proposal

Point Source Coal Tangential-Fired Boilers

State	Current 2006 NOx RACT Limit (lbs/mmBtu) (from State regulations) Applicability Threshold mmBtu/hour Heat Input						OTC 2006 Percent Reduction (Current State reg compared to OTC Limit) Applicability Threshold mmBtu/hour Heat Input				
	> 250*	100 to 250	50 to 100	25 to 50	5 to 25		> 250*	100 to 250	50 to 100	25 to 50	<25
						OTC Limits (lbs/mmBtu):	**0.12**	**0.12**	**0.30**	**0.30**	**NL**
CT	0.20	0.20	0.20	0.20	0.20		40.0	40.0	0.0	0.0	10.0
DE	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
DC	0.43	0.43	NL	NL	NL		72.1	72.1	50.0	50.0	10.0
ME	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
MD	0.38	0.65	0.38	0.38	0.38		68.4	81.5	21.1	21.1	10.0
MA	0.38	0.38	NL	NL	NL		68.4	68.4	50.0	50.0	10.0
NH	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NJ	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NY	0.42	0.5	NL	NL	NL		71.4	76.0	50.0	50.0	10.0
PA	Source Specific NOx RACT						29.4	76.0	50.0	50.0	10.0
SE PA	0.17	0.20	Source Specific RACT				29.4	40.0	50.0	50.0	10.0
RI	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
VT	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NOVA	0.38	0.38	0.38	0.38	0.38		68.4	68.4	21.1	21.1	10.0

n/a indicates that there are no coal-fired boilers in the state.

NL indicates no limit specified in a state rule; in those cases, the more general percent reduction from Table 4-4 was used.

Source Specific NOx RACT indicates that there are no specific limits in the States' rule (i.e., limits were determined on a case-by-case basis); in those cases, the more general percent reduction from Table 4-4 was used.

SE PA refers to the five southeastern Pennsylvania counties (Bucks, Chester, Delaware, Montgomery, and Philadelphia) affected by Pennsylvania's Addition NOx Requirements (129.201)

NOVA refers to the following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

Table 4.10 Current State Emission Limits and Percent Reduction Estimated from Adoption of OTC ICI Boiler Proposal

Point Source Coal-Fired Stoker Boilers

State	Current 2006 NOx RACT Limit (lbs/mmBtu) (from State regulations) Applicability Threshold mmBtu/hour Heat Input						OTC 2006 Percent Reduction (Current State reg compared to OTC Limit) Applicability Threshold mmBtu/hour Heat Input				
	> 250*	100 to 250	50 to 100	25 to 50	5 to 25		> 250*	100 to 250	50 to 100	25 to 50	<25
						OTC Limits (lbs/mmBtu):	**0.12**	**0.22**	**0.30**	**0.30**	**NL**
CT	0.20	0.20	0.20	0.20	0.20		40.0	0.0	0.0	0.0	10.0
DE	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
DC	0.43	0.43	NL	NL	NL		72.1	48.8	50.0	50.0	10.0
ME	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
MD	0.38	0.65	0.38	0.38	0.38		68.4	66.2	21.1	21.1	10.0
MA	0.33	0.33	NL	NL	NL		63.6	33.3	50.0	50.0	10.0
NH	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NJ	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NY	0.3	0.3	NL	NL	NL		60.0	26.7	50.0	50.0	10.0
PA	Source Specific NOx RACT						29.4	26.7	50.0	50.0	10.0
SE PA	0.17	0.20	Source Specific RACT				29.4	0.0	50.0	50.0	10.0
RI	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
VT	n/a	n/a	n/a	n/a	n/a		0.0	0.0	0.0	0.0	0.0
NOVA	0.4	0.4	0.4	0.4	0.4		70.0	45.0	25.0	25.0	10.0

n/a indicates that there are no coal-fired boilers in the state.

NL indicates no limit specified in a state rule; in those cases, the more general percent reduction from Table 4-4 was used.

Source Specific NOx RACT indicates that there are no specific limits in the States' rule (i.e., limits were determined on a case-by-case basis); in those cases, the more general percent reduction from Table 4-4 was used.

SE PA refers to the five southeastern Pennsylvania counties (Bucks, Chester, Delaware, Montgomery, and Philadelphia) affected by Pennsylvania's Addition NOx Requirements (129.201)

NOVA refers to the following jurisdictions in Virginia are part of the OTR: Arlington County, Alexandria, Fairfax County, Fairfax City, Fall Church, Loudon County, Manassas City, Manassas Park, and Prince William County.

4.6.4 Cost Estimates

The OTC recently completed an analysis of ICI boiler NOx control cost estimates (Bodnarik 2006) using detailed information on direct capital equipment costs, direct installation costs, indirect capital costs, and direct and indirect operating costs. The analysis examined five types of NOx control technologies – low-NOx burners (LNB), ultra low-NOx burners (ULNB), LNB plus flue gas recirculation (LNB+FGR), LNB plus selective non-catalytic reduction (LNB+SNCR), and selective catalytic reduction (SCR). The analysis also considered various fuel types – coal, residual oil, distillate oil, and natural gas. The cost effectiveness varies by fuel type, boiler size, current regulatory requirements, current control technology, and boiler firing type. The annual cost-effectiveness was found as low as $600 per ton and as high as $18,000 per ton. In general, for most scenarios the cost effectiveness was estimated to be less than $5,000 per ton of NOx removed.

4.7 NOx EMISSION REDUCTION SUMMARY

The results of the emission benefit calculations for the OTC states are described in this subsection. The starting point for the quantification of the emission reduction benefits is the MANEVU emission inventory, Version 3 (Pechan 2006, MACTEC 2006a) and the VISTAS emission inventory, BaseG (MACTEC 2006b), for the northern Virginia counties that are part of the OTR. The MANEVU and VISTAS inventories include a 2002 base year inventory as well as projection inventories for 2009 and 2018 (MANEVU also has projections for 2012, but VISTAS does not). The projection inventories account for growth in emissions based on growth indicators such as population and economic activity. The projection inventories also account for “on-the-books/on-the-way” (OTB/W) emission control regulations that have (or will) become effective between 2003 and 2008 that will achieve post-2002 emission reductions. Emission reductions from existing regulations are already accounted for to ensure no double counting of emission benefits occurs.

Note that the emission reductions contained in this Section are presented in terms of tons per summer day. The MANEVU base and projection emission inventories do not contain summer day emissions for all States and source categories; the VISTAS inventory only contains annual values. When States provided summer day emissions in the MANEVU inventory, these values were used directly to quantify the emission benefit from the 2006 OTC control measure. When summer day emissions were missing from the MANEVU or VISTAS inventories, the summer day emissions were calculated using the annual emissions and the seasonal throughput data from the NIF Emission Process table. If the

seasonal throughput data was missing, the summer day emissions were calculated using the annual emissions and a summer season adjustment factor derived from the monthly activity profiles contained in the SMOKE emissions modeling system.

Tables 4-11 to 4-17 show State summaries of the emission benefits from the OTC 2006 NOx control measures described previously in this Section. For each of the seven source categories, the Tables show four emission numbers: (1) the actual 2002 summer daily emissions; (2) the summer daily emissions for the 2009 OTB/W scenario that accounts for growth and for the emission control regulations that have (or will) become effective between 2003 and 2008 that will achieve post-2002 emission reductions; (3) the summer daily emissions for 2009 with the implementation of the OTC 2006 control measures identified in this Section, and (4) the emission benefit in 2009 resulting from the OTC 2006 control measure. Table 4-18 shows the same information for the total of all seven source categories.

The largest estimated NOx emission reductions are in the more industrialized States – New York and Pennsylvania – which have most of the cement kilns and glass furnaces in the OTR. These two states also have a large population of ICI boilers. The emission benefits listed for Virginia just include the Virginia counties in the northern Virginia area that are part of the OTR. Benefit estimates for all other States include the entire state. The emission benefits also assume that all OTC members will adopt the rules as described in the previous sections.

Appendix E provides county-by-county summaries of the NOx emission benefits from the OTC 2006 NOx control measures described previously in this Section. Appendix E also provides additional documentation regarding the data sources and emission benefit calculations that were performed. These tables can be used by the States to create additional summaries, for example, by nonattainment area.

Table 4-11 OTC 2006 NOx Model Rule Benefits by State for 2009 Heavy-Duty Truck Diesel Engine Chip Reflash

State	Heavy-Duty Truck Diesel Engine Chip Reflash Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	66.7	n/a	n/a	3.5
DE	21.8	n/a	n/a	0.6
DC	8.1	n/a	n/a	0.8
ME	82.8	n/a	n/a	1.4
MD	105.0	n/a	n/a	5.6
MA	152.7	n/a	n/a	6.7
NH	30.5	n/a	n/a	2.0
NJ	133.5	n/a	n/a	9.7
NY	177.6	n/a	n/a	16.1
PA	437.1	n/a	n/a	12.4
RI	8.3	n/a	n/a	0.8
VT	13.7	n/a	n/a	0.9
NOVA	16.6	n/a	n/a	2.5
OTR	**1254.5**	**0.0**	**0.0**	**63.0**

n/a – not available due to lack of 2009 emissions data for on-road vehicles in NIF format.

Table 4-12 OTC 2006 NOx Model Rule Benefits by State for 2009 Regional Fuels

State	Regional Fuels Summer NOx Emissions (tpd)			
	2006 Actual	2006 Base	2006 Control	2006 Benefit
CT	81.3	81.3	81.3	0.0
DE	24.8	24.8	24.8	0.0
DC	8.4	8.4	8.4	0.0
ME	44.1	44.1	43.8	0.2
MD	144.0	144.0	144.0	0.0
MA	137.4	137.4	137.4	0.0
NH	38.4	38.4	38.2	0.2
NJ	204.2	204.2	204.2	0.0
NY	381.3	381.3	379.1	2.1
PA	284.8	284.8	282.9	2.0
RI	20.5	20.5	20.5	0.0
VT	26.3	26.3	26.0	0.3
NOVA	50.8	50.8	50.8	0.0
OTR	**1446.2**	**1446.2**	**1441.4**	**4.8**

NESCAUM analysis was only completed for 2006. Data for 2002 and 2009 are not currently available

Table 4-13 OTC 2006 NOx Model Rule Benefits by State for 2009
Asphalt Pavement Production Plants

State	Asphalt Pavement Production Plants Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	0.0	0.0	0.0	0.0
DE	0.6	0.6	0.4	0.2
DC	0.0	0.0	0.0	0.0
ME	1.7	2.0	1.3	0.7
MD	0.2	0.2	0.1	0.1
MA	1.1	1.8	1.2	0.6
NH	0.0	0.0	0.0	0.0
NJ	1.3	2.8	1.8	1.0
NY	0.0	0.1	0.0	0.0
PA	0.6	0.7	0.5	0.2
RI	0.1	0.1	0.1	0.0
VT	0.0	0.0	0.0	0.0
NOVA	0.3	0.3	0.2	0.1
OTR	**5.9**	**8.6**	**5.6**	**3.0**

2002 Actual emissions come from the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Table 4-14 OTC 2006 NOx Model Rule Benefits by State for 2009

Cement Kilns

State	Cement Kilns Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	0.0	0.0	0.0	0.0
DE	0.0	0.0	0.0	0.0
DC	0.0	0.0	0.0	0.0
ME	4.7	4.7	4.7	0.0
MD	17.2	17.2	4.1	13.1
MA	0.0	0.0	0.0	0.0
NH	0.0	0.0	0.0	0.0
NJ	0.0	0.0	0.0	0.0
NY	35.1	35.1	19.8	15.3
PA	44.7	44.7	30.7	14.0
RI	0.0	0.0	0.0	0.0
VT	0.0	0.0	0.0	0.0
NOVA	0.0	0.0	0.0	0.0
OTR	**101.9**	**101.9**	**59.4**	**42.5**

2002 Actual emissions come from the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are the emissions forecasted to be the same as in 2002 (i.e., no growth was assumed).

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Table 4-15 OTC 2006 NOx Model Rule Benefits by State for 2009

Glass/Fiberglass Furnaces

State	Glass/Fiberglass Furnace Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	Maximum Control	Maximum Benefit
CT	0.0	0.0	0.0	0.0
DE	0.0	0.0	0.0	0.0
DC	0.0	0.0	0.0	0.0
ME	0.0	0.0	0.0	0.0
MD	0.3	0.3	0.1	0.3
MA	1.4	1.8	0.3	1.5
NH	0.0	0.0	0.0	0.0
NJ	7.7	7.1	2.2	4.9
NY	6.1	6.8	1.0	5.8
PA	36.3	44.3	20.0	24.3
RI	0.7	0.5	0.1	0.5
VT	0.0	0.0	0.0	0.0
NOVA	0.0	0.0	0.0	0.0
OTR	**52.5**	**60.9**	**23.6**	**37.3**

2002 Actual emissions come from the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

Maximum Control Inventory emissions are the emissions remaining after full implementation of the beyond-on-the-way control measures described in this Section. Not all of the anticipated reductions from the glass/fiberglass OTC 2006 control measure will be achieved by 2009. This column shows the emissions remaining after full implementation of the measure, which may not occur until 2012 or 2018.

Maximum Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the base emissions and the maximum control emissions).

Note: The table shows the maximum emission reduction from glass/fiberglass furnaces when the OTC 2006 control measure is fully implemented. Not all of the reduction shown will be achieved by 2009.

Table 4-16 OTC 2006 NOx Model Rule Benefits by State for 2009
ICI Boilers – Area (Minor) Source

State	ICI Boilers – Area (Minor) Sources Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	8.9	9.4	6.5	2.8
DE	3.4	3.5	2.3	1.2
DC	1.3	1.6	1.1	0.4
ME	5.0	5.3	4.2	1.1
MD	3.5	4.0	2.9	1.2
MA	24.4	25.8	19.1	6.6
NH	21.3	24.2	20.8	3.4
NJ	20.5	15.6	15.6	0.0
NY	105.2	112.2	78.4	33.8
PA	38.0	39.8	27.6	12.2
RI	6.6	7.3	5.3	2.1
VT	2.3	2.9	1.9	0.9
NOVA	11.8	11.9	8.1	3.9
OTR	**252.0**	**263.4**	**193.9**	**69.5**

2002 Actual emissions come from the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Table 4-17 OTC 2006 NOx Model Rule Benefits by State for 2009

ICI Boilers – Point (Major) Source

State	ICI Boilers – Point (Major) Sources Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	5.8	5.6	3.5	2.1
DE	7.7	7.3	7.3	0.0
DC	1.0	1.1	0.8	0.4
ME	10.2	12.8	10.1	2.8
MD	14.2	11.2	8.8	2.4
MA	13.8	15.4	8.7	6.8
NH	3.9	4.8	2.9	1.9
NJ	12.9	10.8	7.4	3.4
NY	31.4	30.8	23.8	7.0
PA	33.4	36.5	26.7	9.8
RI	4.2	4.9	4.3	0.5
VT	0.7	0.9	0.5	0.4
NOVA	0.2	0.2	0.0	0.1
OTR	**139.3**	**142.3**	**104.6**	**37.7**

2002 Actual emissions come from the MANEVU 2002 Version 3 inventory and VISTAS 2002 Base G inventory (for the 10 northern Virginia jurisdictions that are part of the OTR).

2009 Base Inventory emissions are the emissions forecasted in the MANEVU 2009 OTB/W Version 3.1 inventory and the VISTAS 2009 Base G inventory, and account for growth and any emission reductions associated with on-the-books/on-the-way controls measures.

2009 Control Inventory emissions are the emissions remaining after implementation of the beyond-on-the-way control measures described in this Section.

2009 Emission Reduction Benefit is the incremental emission reduction from the control measures described in this section (i.e., the difference between the 2009 base emissions and the 2009 control emissions).

Table 4-18 OTC 2006 NOx Model Rule Benefits by State for 2009

All Seven NOx Categories

State	All Seven NOx Categories Summer NOx Emissions (tpd)			
	2002 Actual	2009 Base	2009 Control	2009 Benefit
CT	162.7	n/a	n/a	8.4
DE	58.2	n/a	n/a	2.1
DC	18.8	n/a	n/a	1.6
ME	148.5	n/a	n/a	6.2
MD	284.4	n/a	n/a	22.7
MA	330.8	n/a	n/a	22.2
NH	94.1	n/a	n/a	7.5
NJ	380.0	n/a	n/a	19.0
NY	736.8	n/a	n/a	80.1
PA	874.9	n/a	n/a	74.9
RI	40.5	n/a	n/a	3.9
VT	42.9	n/a	n/a	2.5
NOVA	79.6	n/a	n/a	6.6
OTR	**3252.3**	**n/a**	**n/a**	**257.8**

n/a – not available due to lack of 2009 emissions data for on-road vehicles in NIF format.

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Appendix A – Process for Identifying and Evaluating Control Measures

Background

The States of the Ozone Transport Region (OTR) are faced with the requirement to demonstrate attainment with the 8-hour ozone NAAQS 8-hour ozone National Ambient Air Quality Standards (NAAQS) by June 15, 2008. To accomplish this, most of the states will need to implement additional measures to reduce emissions that either directly impact their nonattainment status, or contribute to the nonattainment status in other states. In addition, the States are conducting attainment planning work to support development of PM2.5 and regional haze State Implementation Plans (SIPs). As such, the Ozone Transport Commission (OTC) undertook an exercise to identify a suite of additional control measures that could be used by the OTR states in attaining their goals.

In March 2005, the Ozone Transport Commission (OTC) established the Control Strategies Committee as an ad-hoc committee to assist with coordination of the attainment planning work. The Control Strategies Committee works with three other OTC committees. The Stationary and Area Source (SAS) Committee evaluates control measures for specific stationary source sectors or issues. The Mobile Source Committee examines control measures for on-road and non-road mobile sources. And the Modeling Committee develops and implements a strategic plan for SIP-quality modeling runs to support attainments demonstrations.

The SAS Committee is comprised of various workgroups that evaluate control measures for specific sectors or issues. These workgroups included:

- Control Measures Workgroup focuses on stationary area sources;
- Reasonably Available Control Technology (RACT) workgroup focuses on major point sources;
- Multi-Pollutant Workgroup focuses on electric generating units (EGUs);
- High Electric Demand Day (HEDD) examines EGU peaking units; and
- Industrial, Commercial, and Institutional (ICI) Boiler Workgroup focuses on control technologies for different fuels and boiler size ranges.

The OTC also issued a contract to MACTEC to help the SAS Committee identify and evaluate candidate control measures as well as to quantify expected emission reductions for each control measure.

Workgroup Activities

Initially, the Workgroups compiled and reviewed a list of approximately 1,000 candidate control measures. These control measures were identified through published sources such as the U.S. Environmental Protection Agency's (EPA's) Control Technique Guidelines, STAPPA/ALAPCO "Menu of Options" documents, the AirControlNET database, emission control initiatives in member states as well as other states including California, state/regional consultations, and stakeholder input. Appendix B provides the initial list of control measures that were evaluated.

Based on the review of the 1,000 candidate control measures, the Workgroups developed a short list of measures to be considered for more detailed analysis. These measures were selected to focus on the pollutants and source categories that are thought to be the most effective in reducing ozone air quality levels in the Northeastern and Mid-Atlantic States. The Workgroups reviewed information on current emission levels, controls already in place, expected emission reductions from the control measures, when the emission reductions would occur, preliminary cost and cost-effectiveness data, and other implementation issues. Each of the candidate control measures on the short list were summarized in a series of "Control Measure Summary Sheets". The Control Measure Summary Sheets are contained in Appendix C. The Workgroups discussed the candidate control measures during a series of conference calls and workshops to further refine the emission reduction estimates, the cost data, and any implementation issues. The Workgroups also discussed comments from stakeholders. The Workgroups prioritized the control measures and made preliminary recommendations regarding which measures to move forward on.

OTC Commissioners' Recommendations

Based on the analyses by the OTC Workgroups, the OTC Commissioners made several recommendations at the Commissioner's meeting in Boston June 2006 and November 2006. The Commissioners recommended that States consider emission reductions from the following source categories:

- Consumer Products
- Portable Fuel Containers
- Adhesives and Sealants Application
- Diesel Engine Chip Reflash
- Cutback and Emulsified Asphalt Paving
- Asphalt Production Plants

- Cement Kilns
- Glass Furnaces
- Industrial, Commercial, and Institutional (ICI) Boilers
- Regional Fuels
- Electric Generating Units (EGUs)

Additionally, the Commissioners requested that EPA pursue federal regulations and programs designed to ensure national development and implementation of control measures for the following categories: architectural and maintenance coatings, consumer products, ICI boilers over 100 mmBtu/hour heat input, portable fuel containers, municipal waste combustors, regionally consistent and environmentally sound fuels, small offroad engine emission regulation, and gasoline vapor recovery. The various recommendations by the OTC Commissioners made from 2004 to 2006 are summarized in Table A-1.

Stakeholder Input

Stakeholders were provided multiple opportunities to review and comment on the Control Measure Summary Sheets. Table A-2 lists the public meetings that were held as an opportunity for stakeholders to review and respond to the Control Measure Summary Sheets and Commissioner's recommendations. Stakeholders provided written comments, as listed in Table A-3. In addition to submitting written comments, the Workgroups conducted teleconferences with specific stakeholder groups to allow stakeholders to vocalize their concerns directly to state staff and to discuss the control options. These stakeholder conference calls and meeting are listed in Table A-4. The OTC staff and state Workgroups carefully considered the verbal and written comments received during this process.

Table A-1: OTC Formal Actions, 2004-2006

Date	Action/Synopsis
Nov. 10, 2004	*Charge to Stationary and Area Sources Committee* Directs SAS Committee to continue to seek out innovative programs to address emissions from all stationary and area sources.
Nov. 10, 2004	*Charge to Stationary and Area Sources Committee Regarding Multi-Pollutant Emission Control for Electrical Generating Units and Large Industrial Sources* Directs the SAS Committee to develop an implementation strategy for to implement the OTC's multi—pollutant position, recommend methods for allocating NOx and SO2 caps, assess methods to advance the OTC's Multi0Pollutant position beyond the OTR, develop a program implementation structure, and present a Memorandum of Understanding for consideration by the Commission.
Nov. 10, 2004	*Charge to the Mobile Source Committee* Directs the Mobile Source Committee to identify selected scenarios to be modeled and evaluate strategies including anti-idling programs, voluntary and regulatory retrofit programs, VMT growth strategies, port and marine engine programs, national mobile source programs, California Low Emission Vehicle programs, and model incentive programs.
Nov. 10, 2004	*Statement on OTC Modeling* Directs the Modeling Committee to coordinate inventories and modeling needed for ozone, regional haze, and PM; seek input for air directors and OTC committees on regional strategies for modeling; continue to use CALGRID as a screening tool; and continue to explore application of emerging tools.
June 8, 2005	*Resolution of the States of the Ozone Transport Commission Regarding Development of a Regional Strategy for the Integrated Control of Ozone Precursors and Other Pollutants of Concern from Electrical Generating Units (EGUs) and Other Large Sources* Resolves that member States: develop a regional Multi-Pollutant program to assist in attaining and maintaining the 8-hour ozone NAAQS; seek to gain support from other states for a broader inter-regional strategy; develop an emissions budget and region-wide trading program; explore all feasible options to utilize the CAIR framework; and develop implementation mechanisms including a Memorandum of Understanding among the states.
Nov. 3, 2005	*Statement of the Ozone Transport Commission With Regard to Advancement of Potential Regional Control Measures for Emission Reduction from Appropriate Sources and State Attain Planning Purposes* Directs the staff of the OTC to continue investigation and modeling work associated with all potential regional control measures.
Feb. 23, 2006	*Action Items* Directs OTC staff to continue efforts on the following issues: Letter to EPA on Small Engines, Consumer Products, Architectural/Industrial Maintenance Coatings (AIM), Chip Reflash, Diesel Emissions Reductions, Modeling Efforts.
June 7, 2006	*Memorandum of Understanding Among the States of the Ozone Transport Commission on a Regional Strategy Concerning the Integrated Control of Ozone Precursors from Various Sources* Commits OTC States to continue to

Date	Action/Synopsis
	work with interested stakeholders and pursue state-specific rulemakings as needed and appropriate regarding the following sectors to reduce emission of ozone precursors: Consumer Products, Portable Fuel Containers, Adhesives and Sealants, and Diesel Engine Chip Reflash.
June 7, 2006	*Statement of the Ozone Transport Commission Concerning Multi-Pollutant Emission Control of Electric Generating Units* Directs OTC staff and its workgroups to continue to formulate a program beyond CAIR to address emissions from this sector and to evaluate and recommend options to address emissions associated with high electrical demand days during the ozone season.
June 7 2006	*Resolution 06-02 of the Ozone Transport Commission Concerning Coordination and Implementation of Regional Ozone Control Strategies for Certain Source Categories* Resolves that OTC States continue to work with interested stakeholders and pursue state-specific rulemakings as needed to establish emission reduction percentages, emission rates or technologies as appropriate for the following source categories: asphalt paving (cutback and emulsified), asphalt plants, cement kilns, regional fuels, glass furnaces, and ICI boilers.
June 7, 2006	*Resolution 06-03 of the Ozone Transport Commission Concerning Federal Guidance and Rulemaking for Nationally-Relevant Ozone Control Measures* Resolves that OTC States request that EPA pursue federal regulations and programs for national implementation of control measures comparable to the levels the OTC has adopted; these areas include AIM Coatings, Consumer Products, ICI Boilers over 100 MMBTU, Portable Fuel Containers, Municipal Waste Combustors, Regional Fuels, Small Engine Emission Regulation, and Gasoline Vapor Recovery.
Nov. 15, 2006	*Modified Charge of the Ozone Transport Commission to the Stationary Area Source Committee Regarding Electric Generating Units* Directs the SAS Committee and workgroups to continue work on EGU emission reduction strategies to incorporate "CAIR Plus" and High Energy Demand Day (HEDD) emission reduction strategies.
Nov. 15, 2006	*Statement of the Ozone Transport Commission Concerning Regional and State Measures to Address Emissions from Mobile Sources* Supports the aggressive implementation of a suite of controls through the OTC Clean Corridor Initiative including: diesel retrofits, the Smartways program, California Low Emission Vehicle programs, anti-idling programs, low-NOx diesel alternatives, transportation demand management to reduce the growth in VMT, and voluntary action and outreach programs.
Nov. 15, 2006	*Addendum to Resolution 06-02 of the Ozone Transport Commission Concerning Coordination and Implementation of Regional Ozone Control Strategies for Various Sources* Resolves that OTC States continue to pursue state-specific rulemakings as needed to establish emission reduction percentages, emission rates or technologies as appropriate for the following source categories: asphalt plants, glass furnaces, and ICI boilers.

OTC formal actions can be found on the OTC website at the following address:

http://www.otcair.org/document.asp?fview=Formal

Table A-2: OTC Control Measures Public Meetings, 2004-2006

Date	Meeting	Location
June 8-9, 2004	OTC/MANE-VU Annual Meeting	Red Bank, NJ
Nov. 9-10, 2004	OTC Fall Meeting	Annapolis, MD
Apr. 21-22, 2005	OTC Stationary and Area Source/Mobile Source Committee Meeting	Linthicum, MD
June 7-8, 2005	OTC Annual Meeting	Burlington, VT
Oct. 5, 2005	OTC Control Strategy Committee Meeting	Linthicum, MD
Nov. 2-3, 2005	OTC Fall Meeting	Newark, DE
Jan. 24, 2006	OTC Control Strategy Committee Meeting	Linthicum, MD
Feb. 22-23, 2006	OTC Special Meeting	Washington, DC
Apr. 5-6, 2006	OTC Control Strategy Committee Meeting	Linthicum, MD
June 6-7, 2006	OTC Annual Meeting	Boston, MA
July 28, 2006	OTC/RTO/ISO Meeting	Herndon, VA
Sep. 18, 2006	OTC High Energy Demand Day Workgroup Meeting	Herndon, VA
Sep. 19, 2006	OTC Stationary and Area Source Committee Meeting	Herndon, VA
Nov. 2, 2006	OTC Control Strategies and Stationary and Area Source Committee Meeting	Linthicum, MD
Nov. 15, 2006	OTC Fall Meeting	Richmond, VA
Dec. 5-6, 2006	OTC High Energy Demand Day Workgroup Meeting	Hartford, CT

Meeting agendas and presentations can be found on the OTC website at the following address:

http://www.otcair.org/document.asp?fview=meeting

Table A-4: Stakeholder Comments on OTC Control Strategies

Stakeholder	**Source Category**
Adhesive and Sealant Council	Adhesives and Sealants
National Paint & Coatings Association (NPCA)	Adhesives and Sealants
Ameron International	AIM Coatings
McCormick Paints	AIM Coatings
National Paint and Coatings Association (NPCA)	AIM Coatings
Painting and Decorating Contractors of America (PDCA)	AIM Coatings
PROSOCO, Inc.	AIM Coatings
RUDD Company Inc.	AIM Coatings
TEX COTE	AIM Coatings
The Master Painters Institute (MPI)	AIM Coatings
The Society for Protective Coatings (SSPC)	AIM Coatings
Wank Adams Slavin and Associates, LLC (WASA)	AIM Coatings
NAPA Asphalt Production	Asphalt Production
MATRIX Systems Auto Refinishing	Auto Refinishing
Portland Cement Association (PCA)	Cement Kilns
St Lawrence Cement	Cement Kilns
Consumer Specialty Products Association (CSPA)	Consumer Products
Cosmetic, Toiletry and Fragrance Association (CTFA)	Consumer Products
National Paint & Coatings Association (NPCA)	Consumer Products
Clean Air Task Force	Diesel Retrofits
Center for Energy and Economic Development, Inc. (CEED)	EGUs
Chesapeake Bay Foundation	EGUs
Clean Air Task Force	EGUs
Conectiv Energy	EGUs
Dominion	EGUs
Exelon	EGUs
International Brotherhood of Electrical Workers , United Mine Workers of America, Center for Energy & Economic Development, Inc., Pennsylvania Coal Association	EGUs
NRG	EGUs
PPL Services	EGUs
The Clean Energy Group	EGUs
National Lime Association (NLA)	Lime Kilns
Debra Jacobson, Prof. Lecturer in Energy Law	NOx Sources
Flexible Packaging Association (FPA)s	Printing/Graphic Arts
Graphic Arts Coalition Flexography Air Regulations	Printing – Flexography
Graphic Arts Coalition Printing & Graphic Arts	Printing/Graphic Arts
Graphic Arts Coalition Screen Litho Air Regulations	Printing – Lithography

Stakeholder comments can be found on the OTC website at the following address:
http://www.otcair.org/projects_details.asp?FID=95&fview=stationary

Table A-4: OTC Conference Calls and Meetings with Stakeholders, 2006

Source Category	Date(s)	Industry Lead
Adhesives and Sealants	Aug. 30, 2006	Adhesives Council
Asphalt Paving	Mar. 30, 2006	National Asphalt Paving Association (meeting)
	Sep. 21, 2006	National Asphalt Paving Association
	Sep. 28, 2006	Asphalt Emulation Manufacturers Association
	Oct. 13, 2006	Asphalt Emulation Manufacturers Association
Asphalt Production	Oct. 25, 2006	National Asphalt Paving Association (meeting)
Consumer Products	Mar. 24, 2006	Consumer Specialty Products Association
	June 22, 2006	American Solvents Council (meeting)
	June 22, 2006	Consumer Specialty Products Association
	Aug. 29, 2006	Consumer Specialty Products Association
Glass Manufacturers	July 5, 2006	North American Insulation Manufacturers Assoc.
	Aug. 16, 2006	North American Insulation Manufacturers Assoc.
	Sep. 14, 2006	Glass Association of North America
	Oct. 19, 2006	Glass Association of North America
ICI Boilers	Mar. 14, 2006	Council of Industrial Boiler Owners
	Mar. 24, 2006	Institute of Clean Air Companies
	July 18, 2006	Council of Industrial Boiler Owners (meeting)
	Aug. 1, 2006	Council of Industrial Boiler Owners (conference)

Appendix B – Initial List of Control Measures

The comprehensive list of control measures can be found at:

http://www.otcair.org

Appendix C – Control Measure Worksheets

This Appendix contains the Control Measure Summary Worksheets for the following source categories:

Manufacture and Use of Adhesives and Sealants
Architectural and Industrial Maintenance Coatings
Asphalt Paving (Emulsified and Cutback)
Asphalt Production Plants
Automotive Refinish Coatings
Cement Kilns
Chip Reflash (Heavy Duty Diesel Engines)
Consumer Products
Glass and Fiberglass Furnaces
Industrial, Commercial, Institutional Boilers
Industrial Surface Coatings – Fabric Printing, Coating, and Dyeing
Industrial Surface Coatings – Large Appliances
Industrial Surface Coatings – Metal Cans
Industrial Surface Coatings – Metal Coils
Industrial Surface Coatings – Metal Furniture
Industrial Surface Coatings – Miscellaneous Metal Parts
Industrial Surface Coatings – Paper and Web Coating
Industrial Surface Coatings – Plastics Parts
Industrial Surface Coatings – Wood Building Products
Industrial Surface Coatings – All Categories
Lime Kilns
Municipal Waste Combustors
Printing and Graphic Arts
Portable Fuel Containers
Reformulated Gasoline

CONTROL MEASURE SUMMARY
Manufacture and Use of Adhesives and Sealants
(SCC- 2440020000)

Control Measure Summary

The provisions of this model rule limit emissions of volatile organic compounds (VOCs) from adhesives, sealants and primers. The model rule achieves VOC reductions through two basic components: sale and manufacture restrictions that limit the VOC content of specified adhesives, sealants and primers sold in the state; and use restrictions that apply primarily to commercial/industrial applications. By reducing the availability of higher VOC content adhesives and sealants within the state, the sales prohibition is also intended to address adhesive and sealant usage at area sources. Emissions from residential use of regulated products are addressed through the sales restrictions and simple use provisions.

A reasonably available control technology determination prepared by the California Air Resources Board (CARB) in 1998 forms the basis of this model rule. In the years 1998-2001, the provisions of the CARB determination were adopted in regulatory form in various air pollution control districts in California including the Bay Area, South Coast, Ventura County, Sacramento Metropolitan and San Joaquin Valley.

Costs and Emissions Reductions

2002 existing measure: No existing limitations for this category

Candidate measure: Approximately 75% of VOC emissions originate from solvent-based adhesives and sealants, the remaining 25% of VOC in this category are due to water-based materials. VOC content limits have been enacted by various APCD in California from 1998 to 2001.

***Emissions reductions*:** VOC content limits for the solvent-based materials can result in 64.4% reduction in total emissions from this category. (CARB RACT/BARCT for Adhesives/ Sealants, Dec 1998)

***Control costs*:** Costs for control by reformulation are estimated by the CARB at less than $2500 / ton (1999$). Many manufacturers have either reformulated solvent-based products to reduce the VOC content or have developed low-VOC water-based latex and acrylic products, or polyurethane or silicone products in response to the adoption of similar regulations in California. Thus, the actual costs in the OTC region are anticipated to be lower.

Estimated costs for add-on controls carbon and thermal oxidizers ranged from $10,000 to $100,000 per ton.
***Timing of implementation*:** 01/01/09
***Implementation area*:** Region-wide

Annual VOC
2002 Emissions: 35,489 tpy
2009 Emissions: 46,241 tpy
2009 Reduction: 29,438 tpy
2009 Remaining: 16,803 tpy

Summer VOC
2002 Emissions: 99.8 tpd
2009 Emissions: 129.8 tpd
2009 Reduction: 82.3 tpd
2009 Remaining: 47.5 tpd

Interaction with other OTC Model Rules

The products regulated in this model rule do not overlap with the products regulated by either the architectural and industrial maintenance (AIM) or consumer product rules. A "coating," as contemplated in the AIM rule, is a "material applied onto or impregnated into a substrate for protective, decorative or functional purposes." Because the coating is applied only to one substrate, it is clearly distinguished from adhesives and sealants, which are defined in both the consumer product and adhesive rules by application to two surfaces; in the case of adhesives, the two surfaces are directly bonded while in the case of sealants, a gap between two surfaces is filled.

The overlap between the consumer product and adhesive rules is addressed mainly by an exemption in the adhesive rule for adhesives and sealers subject to the state's consumer products regulation.

Reference:

California Air Resources Board. *Determination of Reasonably Available Control Technology and Best Available Retrofit Technology for Adhesives and Sealants*. December 1998. Page 18 provides the emission reduction estimates for California: the ARB emission inventory estimates 45 tons per day pre-rule; reductions will range from approximately 29 to 35 tons per day. We used the low end of this range to calculate the percent reduction of 64.4% (i.e. 29 tpd/45 tpd). Page 17 provides the cost-effectiveness information: the cost of complying with the determination reflects the cost of using alternative formulations of low-VOC or water-based adhesives, sealants, and cleanup products. Ventura County APCD staff determined that the cost-effectiveness of their adhesives rule ranges from a savings of $0.53 per pound to a cost of $1.16 per pound of VOC reduced ($1,060 to 2,320). The use of add-on control equipment to comply was $4.50 to $55.00 per pound ($9,000 to $110,000).

CONTROL MEASURE SUMMARY FOR
AIM Coatings

Control Measure Summary: VOC emission reductions can be obtained through modifying the current formulation of the coating to obtain a lower VOC content. The regulatory approach for reducing emissions is to establish VOC content limits for specific coatings that manufacturers are required to meet either through reformulating products or substituting products with compliant coatings.	**Emissions (tons/year)**
2001 existing measure: Federal AIM rules 40CFR Part 59 *Emission Reductions*: 20% reduction from uncontrolled levels *Control Cost*: $228 per ton *Timing of Implementation*: Compliance required by September 1999 *Implementation Area*: Nationwide	**VOC (with Part 59 limits)** 2002 OTR total: 124,173
2009 On-the-Way Measure: OTC Model Rule based on a model rule adopted by the California Air Resources Board (CARB) in June, 2000 for 33 air control districts. *Emission Reductions*: 31% beyond Federal AIM rule *Control Cost*: $6,400 per ton	**VOC (After OTC Model Rule)** 2009 Reduction: -25,150 2009 Remaining: 99,023
Candidate measure: Follow CARB 2007 Rulemaking. Modify rule as appropriate when complete (in time for 2009) Participate actively in CARB process. Conduct survey in 2006 for 2005 sales data. *Emission Reductions* : 6% emissions reduction For modeling purposes we split the difference between SCAQMD and OTC model rule. But we go 75% of the way toward SCAQMD on the top four sales products, and set a 250 g/l VOC limit for Industrial Maintenance coatings. The reductions are calculated using the "reg neg" spreadsheet. *Control Cost*: Cost of OTC Survey (revise with cost data from the future CARB SCM when available in 2007) SCAQMD estimated the overall cost-effectiveness for their 1999 Amendments to $13,317 per ton. For Dec. 5 2003 amendments to Rule 1113, SCAQMD estimated the cost-effectiveness to be in the range of $4,229 to $11,405 per ton *Timing of Implementation:* 01/01/09 *Implementation Area*: Throughout OTR and MRPO	**VOC (After CARB 2007 Rule)** 2009 Reduction: -5,941 2009 Remaining: 93,082

REFERENCES:

2002 Existing Measure (Federal Part 59 Rules):

E.H. Pechan & Associates, Inc., *AirControlNET Version 4.1: Documentation Report*, September 2005. Pages III-1347 and III-1348 shows the 20% reduction for the Federal Part 59 rule at a cost of $228 per ton (1990$).

2009 On-the-Books Measure (OTC Model Rule):

E.H. Pechan & Associates, Inc., *Control Measure Development Support Analysis of Ozone Transport Commission Model Rules*, March 31, 2001. Table II-6 shows 31% reduction (OTC Model Rule beyond Federal rule). Page 15 presents cost of $6,400 per ton based on CARB's 2000 Staff Report for the Suggested Control Measure for Architectural Coatings.

Candidate Measure (CARB 2007 Suggested Control Measure):

CARB is in the process of updating the 2000 Suggested Control Measure (SCM) for Architectural Coatings this year. They will be using 2004 survey data as an important resource to update the SCM, but will not begin the formal SCM update process until the survey is completed. They anticipate bringing the SCM update to our Board in mid to late 2007.

CARB is developing an analysis of costs for implementing an updated it's Suggested Control Measure. Results of the analysis will not be available until 2007.

Cost information for the South Coast Phase rules were obtained from:

South Coast Air Quality Management District. *Final Staff Report for Proposed Amended Rule 1113 – Architectural Coatings*. December 5, 2003. "estimated the cost-effectiveness to be in the range of $4,229 to $11,405 per ton of VOC reduced. The low end of the range was determined based on the retail cost of compliant coatings reported by coating manufacturers surveyed by staff. The upper end of the range was derived by estimating the increased cost at the retail level due to the increase in cost of raw materials, reformulation, testing and packaging a new product prior to commercialization." The Dec. 2003 amendments lowered the VOC limit for the following specialty coating categories: clear wood finishes including varnishes and sanding sealers, roof coatings, stains, and waterproofing sealers including concrete and masonry sealers.

South Coast Air Quality Management District. *Appendix F Addendum to Staff Report, Final Socioeconomic Impact Assessment, Proposed Amendments to Rule 1113*. May 1999. The May 1999 amendments to Rule 1113 lower VOC limits for the coating categories of industrial maintenance; non-flats; primers, sealers, and undercoaters; quick-dry enamels; quick-dry primers, sealers, and undercoaters; roof coatings; floor coatings, rust preventative coatings, stains, and waterproofing wood sealers. The overall cost-effectiveness of the proposed amendments, (total costs/total emission reductions) over the years 2002-2015, is estimated to be $13,317 per ton.

CONTROL MEASURE SUMMARY FOR EMULSIFIED AND CUTBACK ASPHALT PAVING

Control Measure Summary: OTC Regional Ban on Cutback Asphalt in Ozone Season, with lower VOC/Solvent Contents for Emulsified Asphalt.	**VOC Emissions in Ozone Transport Region**
2002 existing measures: *1. Cutback asphalt: The OTC states typically ban the use of cutback asphalt during the ozone season. States do provide various exemptions to the ban, most notably allowances may be made for cutbacks which contain less than 5% VOC.* *2. Emulsified asphalt: Ten of the OTC states regulate emulsified asphalt by providing allowable VOC content limits for the various applications. Three of the states do not address emulsified asphalts in their regulation.* *Control Cost*: According to the 1977 CTG (EPA-450/2-77-037), which formed the basis for the existing regulations, the use of emulsified asphalts (no VOC) presented a cost savings. *Timing of Implementation*: All regulations implemented in 1990s or earlier under the 1-hour ozone standard. *Implementation Area*: OTC 1-hour ozone non-attainment areas.	**Annual VOC** 2002 cutback: 9,154 tpy 2002 emulsified: 10,379 tpy 2002 total: 19,533 tpy **Summer VOC** 2002 cutback: 17.5 tpd 2002 emulsified: 38.5 tpd 2002 total: 56.0 tpd
Candidate measure: For cutback asphalt paving *Measure ID:* **BOTW09-AP-Cutback** Place a complete prohibition on the use of cutback asphalt during the ozone season. *Emission Reductions*: to be achieved from using lower VOC content emulsified asphalt products or working outside the ozone season. ***Control Cost*:** Negligible. ***Timing of Implementation*:** 01/01/09 ***Implementation Area*:** All OTC 8-hour ozone non-attainment counties or individual state-wide.	**Summer VOC** 2009 OTB: 19.9 tpd 2009 Reduction: 19.9 tpd 2009 Remaining: 0.0 tpd
Candidate measure: For emulsified asphalt paving *Measure ID:* **BOTW09-AP-Emulsified** Proposes to limit ozone season use of emulsified asphalt to that which contains not more than 0.5 ml of oil distillate from the 200 mL sample using the ASTM D244 test method regardless of application (which is 0.25% VOC by volume) *Emission Reductions*: to be achieved from using lower VOC content emulsified asphalt products or working outside the ozone season. *Control Cost*: Negligible ***Timing of Implementation***: 01/01/09 ***Implementation Area*:** All OTC 8-hour ozone non-attainment counties or individual state-wide.	**Summer VOC** 2009 OTB: 44.2 tpd 2009 Reduction: 39.9 tpd 2009 Remaining: 4.3 tpd
Control Measure Recommendation: States implement most stringent measure possible to achieve VOC reductions by 2009 from OTB projections in OTC states, with out disrupting state and county paving operations.	
Brief Rationale for Recommended Strategy: (1) Delaware already implements and complies with the most stringent proposed control strategy. (2) The control strategy is supported by the 1977 Control Techniques Document EPA-450/2-77-037.	

CONTROL MEASURE SUMMARY FOR
Asphalt Production Plants

Control Measure Summary: NOx emission reductions can be obtained through installation of low NOx burners and flue gas recirculation. SO2 can be reduced by reducing the sulfur in fuel limits for distillate oil to 500 ppm.	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measure: No existing limitations for this specific category have been identified.	2002 NOx Base: 2002 SO2 Base:	827 847
Candidate Measure: ***Emission Reductions*:** NOx can be reduced between 35% to 50% with low NOx burners and flue gas recirculation (FGR). SO2 can be reduced 25% to 75% by reducing the sulfur in fuel limits for distillate oil to 500 ppm. The MANEVU data for this category is incomplete. Only major point sources are typically included in the point source database. Non-major source emissions are likely lumped into the area source inventory with other industrial/commercial boilers/heaters. The point source data projects only 800+ tons per year (TPY) of both NOx and SO2 actual emissions in 2002 for the entire region. New York actual emissions are over 600 TPY of NOx and 400 TPY of SO2. Therefore, it is unknown what the actual reductions will produce as no accurate baseline exists for both major and minor facilities. ***Control Cost*:** Costs for control are similar to those of small to midsize boilers or process heaters. Low NOx burners range from $500 to $1250 per ton. While Low NOx burners in combination with FGR range from $1000 to $2000 per ton. Projected cost increase from lowing sulfur in distillate oil is approximately 2 to 3 cents per gallon. ***Timing of Implementation*:** Similar to the NOx RACT procedures of 1994. Require a NOx compliance plan by the spring of 2008 with full implementation and compliance within one year (01/01/09). Unknown for sulfur-in-fuel reductions. ***Implementation Area*:** Region-wide	**NOx** 2009 Base: 2009 Reduction: 2009 Remaining: **SO2** 2009 Base: 2009 Reduction: 2009 Remaining:	 1,276 -549 727 1,266 -950 316

Recommended Strategy: States should support rules that encourage a combination of Best Management Practices, Low NOx Burners and FGR in asphalt production plants to achieve a 20-35% reduction in NOx emissions form a 2002 base, and encourage the use of low-sulfur oil.
Area source emissions from asphalt plants are not included in this summary.

REFERENCES:

Note: The reductions estimated for this category only include emissions from point sources. Area source emissions from fuel combustion at asphalt production plants are not explicitly contained in the area source emissions. These emissions are likely lumped together in the general area source industrial and commercial fuel use category. Reductions from area source emissions at asphalt production plants are included in the ICI boiler source category.

Candidate Measure (Low NOx Burners plus FGR; low sulfur fuel oil):

The emission reduction estimates and cost-effectiveness data were provided by NYSDEC. These control efficiencies and cost-effectiveness estimates for Low NOx Burners plus FGR are generally consisten with the data presented in E.H. Pechan & Associates, Inc., *AirControlNET Version 4.1: Documentation Report*, September 2005. Information in this report for small oil-fired process heaters and ICI boilers provide similar levels of control and cost-effectiveness.

Candidate Measure (Best Management Practices)

Best Practices to Reduce Fuel Consumption and/or Lower Air Emissions: HMA industry leaders have identified a number of Best Practices that, if implemented, allow for substantial reduction in plant fuel consumption and the corresponding products of combustion including NOx. In today's business environment, there is significant incentive to reduce fuel usage. For this reason, implementing best practices to reduce fuel consumption and NOx emissions, forms the basis of a sustainable strategy.

Effective stockpile management to reduce aggregate moisture content: Current information indicates that effective stockpile management can reduce aggregate moisture content by about 25 percent, corresponding to a reduction in fuel consumption by approximately 10 - 15 percent. There are a number of ways to reduce aggregate moisture: covering stockpiles, paving under stockpiles, and sloping stockpiles are all ways that prevent aggregate from retaining moisture. Best Practices are plant- and geographic locale-specific.

Burner tune-ups: As identified in OTC Resolution 06-02 and companion control measures summaries, a burner tune-up may reduce NOx emissions by up to 10 percent. From a contractor's perspective, this also is helpful in reducing fuel consumption. In other words, there can be a direct pay-back to the business from regular burner tune-ups.

Lowering mix temperature: A Technical Working Group of FHWA is currently investigating a number of newer formulation technologies, to understand the practicality and performance of lowering mix temperatures. Substantial reductions in mix temperatures, on the order of 20 percent or more, appear to be plausible. Lowering mix temperatures, by this amount, may reduce fuel consumption, as less heat is needed to produce the mix.

Other maintenance and operational best practices: Additional practices can be employed throughout the plant to help optimize production and operations. For example, regular inspection of drum mixing flites and other measures can be taken – all in the effort to make a plant operate more efficiently, thereby using less fuel.

Plant Type	**Emission Rate (lbs NOx/ton asphalt produced)**	**% Reduction**
Area/Point Sources (State emissions option)		
Batch Mix Plant – Natural Gas	0.02	35
Batch Mix Plant – Distillate/Waste Oil	0.09	35
Drum Mix Plant – Natural Gas	0.02	35
Drum Mix Plant – Distillate/Waste Oil	0.04	35
Area/Point Sources (State technology option)		
Batch/Drum Mix Plant – Natural Gas	Low-NOx Burner Technology and/or Best Management Practices	
Batch/Drum Mix Plant – Distillate/Waste Oil	Low-NOx Burner Technology and/or Best Management Practices	

CONTROL MEASURE SUMMARY FOR
Auto Refinish Coatings – Area Source

Control Measure Summary: Limiting the concentration of solvents in Auto Refinishing Coatings in order to reduce VOC emissions. Encourage the use of high transfer-efficiency painting methods (e.g., high volume low pressure spray guns), and controls on emissions from equipment (e.g., spray gun) cleaning, housekeeping activities (e.g., use of sealed containers for clean-up rags), and operator training.	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measure: Federal Auto Body Refinishing rules 40CFR Part 59 Subpart B *Emission Reductions*: 37% reduction from Part 59 (from Pechan OTC Model Rule Report) due to Part 59 VOC content limits *Control Cost*: $118 per ton for Part 59 rules *Timing of Implementation*: Part 59 compliance required by January 1999 *Implementation Area*: Part 59 – Nationwide;	**VOC** Uncontrolled: 2002 Reduction: 2002 Base:	 50,759 -18,781 31,978
OTB Control Measure: OTC Model Rule for Mobile Equipment Repair and Refinishing *Emission Reductions*: 38% reduction from 2002 Levels in those States that adopted OTC model Rule (per Pechan March 31, 2001 OTC Model Rule Report) *Control Cost*: $1,534 per ton of VOC *Timing of Implementation*: Assuming 2007 effective date of rule, emission reductions are achieved 01/01/09. *Implementation Area*: All counties in the OTR.	**VOC:** 2009 Reduction: 2009 Remaining:	 -10,468 21,510
Candidate measure: CARB October 20, 2005 SCM Staff Report – Lowers VOC limits, combines coatings categories, simplifies recording. *Emission Reductions*: CARB estimates a 65% reduction in VOC emissions from a 2002 baseline; the OTC model rule is very similar to the CARB 2002 baseline, so a similar reduction would be expected in the OTR. *Control Cost*: $2,860 per ton *Timing of Implementation*: Assuming 2007 effective date of rule, emission reductions are achieved in beginning 01/01/09. *Implementation Area*: All counties in the OTR.	**VOC:** 2009 Reduction: 2009 Remaining:	 -13,981 7,529

REFERENCES:

2002 Existing Measure (Federal Part 59 Rules):

E.H. Pechan & Associates, Inc., *AirControlNET Version 4.1: Documentation Report*, September 2005. Pages III-1364 shows the Federal Part 59 rule at a cost of $118 per ton (1990$) and a reduction of 37 percent from uncontrolled levels.

2009 On-the-Books Measure (OTC Model Rule):

E.H. Pechan & Associates, Inc., *Control Measure Development Support Analysis of Ozone Transport Commission Model Rules*, March 31, 2001. Table II-6 shows 37% reduction for Federal Part 59 rule and 38% (OTC Model Rule beyond Federal rule). Page 17 presents cost of $1,534 per ton based on estimates used for PA Rule 129.75.

Candidate Measure (CARB 2005 Suggested Control Measure):

California Air Resources Board. *Staff Report for the Proposed Suggested Control Measure for Automotive Coatings*. October 2005. Table V-3 shows the estimated 65% reduction from 2002 baseline emissions for new automotive coatings limits. A similar reduction is expected for the OTR. Page VII-6 indicates that the cost-effectiveness of the SCM is estimated to be $1.43 per pound of VOC reduced ($2,860 per ton). The CARB SCM coating categories and VOC limits are:

Table ES-1 - Proposed Coating Categories and VOC Limits

Coating Category	VOC regulatory limit as applied Effective January 1, 2009	
	grams/liter	(pounds per gallon*)
Adhesion Promoter	540	4.5
Clear Coating	250	2.1
Color Coating	420	3.5
Multi-Color Coating	680	5.7
Pretreatment Coating	660	5.5
Primer	250	2.1
Single-Stage Coating	340	2.8
Temporary Protective Coating	60	0.5
Truck Bed Liner Coating	310	2.6
Underbody Coating	430	(3.6
Uniform Finish Coating	540	4.5
Any other coating type	250	2.1

The OTC Model Rule coating categories and VOC limits are:

OTC Model Rule *Coating Type*	*Grams per Liter*	*Limit Pounds per gallon*
Automotive pretreatment primer	780	6.5
Automotive primer-surfacer	575	4.8
Automotive primer-sealer	550	4.6
Automotive topcoat:		
single stage-topcoat	600	5.0
2 stage basecoat/clearcoat	600	5.0
3 or 4-stage basecoat/clearcoat	625	5.2
Automotive Multi-colored Topcoat	680	5.7
Automotive specialty	840	7.0

CONTROL MEASURE SUMMARY FOR
Cement Kilns

Control Measure Summary:	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measure: NSR; PSD; State RACT.	**NOx** 2002 Base:	 31,960
On the Books: NOx SIP Call *Measure ID:* NOx SIP Call *Emission Reductions*: The SIP Call requirements were estimated by EPA to result in NOx reductions of approximately 25 percent from the cement industry. *Control Cost*: $2,000 per ton *Timing of Implementation*: 2004 *Implementation Area*: OTR	**NOx** 2009 Base: 2009 Reduction: 2009 Remaining:	 31,960 -7,990 23,970
Candidate measure: Use of proven control technologies (such as SNCR) or other methods to meet recommended emission limits. *Emission Reductions*: source specific, varies from 0-63% based upon 2002 base rates. *Control Cost*: less than 2,500 per ton *Timing of Implementation*: 01/01/09 *Implementation Area:* OTR	**NOx** 2009 Base: Candidate Reduction: 2009 Remaining:	 31,960 -13,231 18,279

Policy Recommendation: It is recommended that a program be developed reduces NOx emissions from existing cement kilns by requiring existing kilns to meet a NOx emission rate of

3.88 lbs/ton clinker for wet kiln

3.44 lbs/ton clinker for long dry kiln

2.36 lbs/ton clinker for pre-heater kiln

1.52 lbs/ton clinker for pre-calciner kiln.

Trading between facilities would not be permitted, but averaging at a facility would be permissible.

Brief Rationale for Recommended Strategy: This limit is consistent with the emission reduction capabilities of SNCR. There are 18 full-scale SNCR installations in Europe.

REFERENCES

EC/R Incorporated. *NOx Control Technologies for the Cement Industry* – Final Report. September 19, 2000. This report for EPA shows data for two SNCR technologies, biosolids injection and NOXOUT®. These technologies showed average emission reductions of 50 and 40 percent, respectively. For biosolids injection, "Cost effectiveness for this kiln is based on the annualized costs of ($320,000/year), the emission reduction achieved at that facility (emissions decreased from 2.4 lb/ton of clinker to 1.2 lb/ton of clinker), a kiln capacity of 215 tons/hr, and an annual operation of 8,000 hr/yr. Cost effectiveness is a credit of ($310/ton) for installing biosolids injection on this kiln" due to tipping fee for using biosolids (dewatered sewage sludge) For NOXOUT®, "40 percent NOX reduction based on the available test data. Cost effectiveness for the two kilns, using urea as the reagent, is based on an uncontrolled emission rate of 3.8 lb NOX/ton of clinker, kiln capacities of 92 and 130 tons/hr respectively, annual operation of 8,000 hr/yr, and a NOX control efficiency of 40%. Cost effectiveness is $1,000/ton for the smaller kiln and $2,500/ton for the larger kiln."

European Commission. *Integrated Pollution Prevention and Control (IPPC) Reference Document on Best Available Techniques in the Cement and Lime Manufacturing Industries*. December 2001. These report indicates that there are 18 full-scale SNCR installation in Europe. Most SNCR installations are designed and/or operated for NOx reduction rates of 10-50% which is sufficient to comply with current legislation in some countries. Two Swedish plants installed SNCR in 1996/97 and have achieved a reduction of 80-85% at both kilns.

Emission Rates:

Table 4-5 of the EPA's *NOx Control Technologies for the Cement Industry, September 19, 2000* provides the following uncontrolled emission rates for the four types of cement kilns:

Kiln Type	Heat Input Requirement (mmBtu/ton of clinker)	Average NOx Uncontrolled Emission Rate (lb/ton of clinker)	Range of NOx Uncontrolled Emission Rate (lb/ton of clinker)
Wet	6.0	9.7	3.6 to 19.5
Long Dry	4.5	8.6	6.1 to 10.5
Preheater	3.8	5.9	2.5 to 11.7
Precalciner	3.8	3.8	0.9 to 7.0

The OTC Control Measure Summary Sheet calls for a 60% reduction from uncontrolled emissions. Using this percent reduction figure and the uncontrolled emission rates above, the following controlled emission rates were calculated:

Kiln Type	Percent Reduction from Uncontrolled	Low-End NOx Controlled Emission Rate (lb/ton of clinker)	Average NOx Controlled Emission Rate (lb/ton of clinker)	High-End NOx Controlled Emission Rate (lb/ton of clinker)
Wet	60	1.44	3.88	7.80
Long Dry	60	2.44	3.44	4.20
Preheater	60	1.00	2.36	4.68
Precalciner	60	0.36	1.52	2.80

The State/workgroup lead recommended the use of the the average NOx Controlled emission rates in the above table (expressed as lb/ton of clinker).

CONTROL MEASURE SUMMARY FOR
Chip Reflash

Control Measure Summary: Upgrade the version of software in engine electronic control module (ECM) aka "Chip Reflash". Software reprograms the vehicle's computer and reduces off-cycle NOx emissions. The installation process typically takes between one-half to one hour.	**Emissions Reductions (tons/day)**	
2002 existing measure: No existing measure in the OTR other than the EPA program resulting from the consent decrees on 7 heavy duty engine manufacturers. The results of the EPA program thus far are significantly lower than the level originally projected by the Agency (less than 10% implementation). CARB implemented a voluntary program that did not achieve its expected results, so the Board's backstop mandatory program was triggered. The CARB mandatory program is facing two separate legal challenges, alleging that CARB has breached its settlement agreement and alleging that CARB is illegally establishing different emissions standards on "new engines".		
Candidate measure: *Measure ID:* Model rule for Mandatory Chip Reflash Program in the OTR *Emission Reductions*: NOx reduction (TPD) from in-state registered vehicles *Control Cost*: Moderate – manufacturers must provide the rebuild kits free to any truck operator who requests it. The cost associated with the reflash has been estimated at $20-$30 per vehicle, which is borne by the engine manufacturer. There may be costs associated with potential downtime to the trucking firms, and record-keeping requirements on the dealer performing the reflash and the vehicle owner. For the MRPO, ENVIRON estimated cost effectiveness to be "$1,800 to $2,500 (depending on vehicle size) due to incremental "fuel penalty" of 2% increase in fuel consumption). However, in reality, no fuel penalty has been documented on vehicles that have already been reflashed. *Timing of Implementation*: The kits are currently available, so once the states adopt the rule, retrofits can begin according to the schedule. *Implementation Area*: All OTR and MRPO states (NOx reductions 109 TPD)	LADCO Northeast states Mid-Atlantic States Total OTR	46 TPD 41 TPD 22 TPD 63 TPD
Policy Recommendation of State/Workgroup Lead: Expand scope of the model rule for the Northeast states to the entire OTR and MWRPO		
Brief Rationale for Recommended Strategy: While the EPA program provides a good platform for chip reflash retrofits, the federal program is not even achieving 10% of its estimated emission reductions. The kits are available and must be given to the truckers for free; yet without additional motivation, it is unlikely that the implementation rate will improve due to fuel consumption and/or performance perceptions and the ability to extend the time to next major rebuild/overhaul. The states in the OTR do not face the prospect of breach-of-settlement allegations that CARB did in adopting a mandatory program, since they did not participate in the negotiation of the CD settlements. And there are significant emission reductions that can be achieved through a mandatory program, even though installing the kits will not result in the engines operating at the same emission levels required for the EPA engine certification test. Nevertheless, this is a relatively simple fix for a problem that our states will face if they rely on the federal program alone to produce emission reductions from these sources.		

CONTROL MEASURE SUMMARY FOR
Consumer Products

Control Measure Summary: Consumer Products This control measure establishes limits on the VOC content of consumer products. It is based on the California Air Resources Board (CARB) consumer products rules, with some region specific modifications. It regulates categories such as hairspray, air fresheners, glass and general purpose cleaners, adhesives, anti-perspirants and deodorants, insecticides and automotive aftermarket products.	**VOC Emissions in Ozone Transport Region**	
2002 Existing Measure: The Federal Consumer Products Rule Part 59 *Emission Reductions*: 20 % reduction of the categories being regulated or 9.95 % reduction of the entire consumer products inventory (about 40 % of products were included in rule). *Control Cost*: $237 per ton of VOC reduced *Timing of Implementation*: 12/98 *Implementation Area*: Nationwide	**2002 Annual** Uncontrolled: Reduction: Remaining: **2002 Summer** Uncontrolled: Reduction: Remaining:	 258,537 tpy 25,724 tpy 232,813 tpy 713.9 tpd 71.0 tpd 642.9 tpd
2009 On-the-Books Measure: Adopt the 2001 OTC Model Rule for Consumer Products in all OTC states (this model rule was based on a series of five CARB consumer products rules). *Emission Reductions*: 14.2 % beyond federal rule or a total of 21 % from the uncontrolled state. *Control Cost*: $800 per ton VOC reduced *Timing of Implementation*: 1/1/05 effective date of VOC limits (though some states were later and some have yet to adopt) *Implementation Area*: OTR	**2009 Annual** Reduction: Remaining: **2009 Summer** Reduction: Remaining:	 22,916 tpy 209,897 tpy 63.4 tpd 579.5 tpd
Candidate Measure #1: Adopt the CARB amendments to their consumer products rule, adopted 7/20/05, with the exception of the 12/31/09 shaving gel, and 12/31/08 anti-static aerosol VOC limits. This rule sets new VOC limits for 11 categories, revises the existing VOC limit for 1 category and includes some additional requirements. See more detailed limits below. *Emission Reductions*: CARB estimates their rule will achieve a 6.3 ton/day reduction of VOC in California, which is equivalent to about 11.3 tons per day in the OTR or a 2% reduction beyond the on-the-books measure. *Control Cost*: $4,800 per ton of VOC reduced *Timing of Implementation*: 01/01/09 *Implementation Area* OTR	**2009 Annual** Reduction: Remaining: **2009 Summer** Reduction: Remaining:	 7,453 tpy 202,444 tpy 20.6 tpd 558.9 tpd
Candidate Measure #2: Follow and adopt as appropriate CARB 's next round of amendments to their consumer products rule, to be developed and proposed by approximately late 2006/early 2007 with limits effective in 2010. *Emission Reductions*: The CONS-2 amendments are estimated by CARB to achieve VOC reductions of about 20-35 tpd in California by 2010 which is equivalent to about 36-63 tpd in the OTR (The mid-point of this range was used in the calculations, 49.5 tpd). *Control Cost*: Unknown at present; *Timing of Implementation*: 01/01/10 *Implementation Area OTR*	***VOC not modeled:*** **2009 Annual** Reduction: Remaining: **2009 Summer** Reduction: Remaining:	 Not Available

Summary of Candidate Measure #1: The proposed VOC limits based on CARB's 7/20/05 amendments are as follows:

Summary of Candidate Measure #1: The proposed VOC limits based on CARB's 7/20/05 amendments are as follows:

PRODUCT CATEGORY	CARB VOC CONTENT LIMIT %	OTC PROPOSED CONTENT LIMIT%	CARB EFFECTIVE DATE	OTC PROPOSED EFFECTIVE DATE
Adhesive, Contact – General purpose *	55	55	12/31/2006	1/1/2009
Special Purpose*	80	80	12/31/2006	1/1/2009
Adhesive Remover - Floor or Wall covering	5	5	12/31/2006	1/1/2009
Gasket or Thread Locking	50	50	12/31/2006	1/1/2009
General Purpose	20	20	12/31/2006	1/1/2009
Specialty	70	70	12/31/2006	1/1/2009
Anti-static - non-aerosol	11	11	12/31/2006	1/1/2009
Electrical Cleaner	45	45	12/31/2006	1/1/2009
Electronic Cleaner	75	75	12/31/2006	1/1/2009
Fabric refresher – aerosol	15	15	12/31/2006	1/1/2009
non-aerosol	6	6	12/31/2006	1/1/2009
Footware or Leather Care - aerosol	75	75	12/31/2006	1/1/2009
Solid	55	55	12/31/2006	1/1/2009
all other forms	15	15	12/31/2006	1/1/2009
Graffiti Remover –aerosol	50	50	12/31/2006	1/1/2009
non-aerosol	30	30	12/31/2006	1/1/2009
Hair Styling Products – aerosol & pump sprays	6	6	12/31/2006	1/1/2009
all other forms	2	2	12/31/2006	1/1/2009
Shaving Gel	7	7	12/31/2006	1/1/2009
Toilet/Urinal Care – aerosol	10	10	12/31/2006	1/1/2009
non-aerosol	3	3	12/31/2006	1/1/2009
Wood Cleaner – aerosol	17	17	12/31/2006	1/1/2009
non-aerosol	4	4	12/31/2006	1/1/2009
* Change to an existing category				

References:

2002 Existing Measure (Federal Part 59 Rules):

E.H. Pechan & Associates, Inc., *Control Measure Development Support Analysis of Ozone Transport Commission Model Rules*, March 31, 2001.

E.H. Pechan & Associates, Inc., *AirControlNET Version 4.1: Documentation Report*, September 2005. Pages III-1377 shows the Federal Part 59 rule at a cost of $237 per ton (1990$).

2009 On-the-Books Measure (OTC Model Rule):

E.H. Pechan & Associates, Inc., *Control Measure Development Support Analysis of Ozone Transport Commission Model Rules*, March 31, 2001. Table II-6 shows 14.2% reduction (OTC Model Rule beyond Federal rule). Page 8 presents cost of $800 per ton based on CARB's Sept. 1999 Initial Statement of Reasons for Proposed Amendments to the California Consumer Products Regulation.

Candidate Measure #1 (CARB 2005 and 2006/2007 Amendments):

California Air Resources Board. *Initial Statement of Reasons for Proposed Amendments, Volume 1: Executive Summary*. June 24, 2004. Table 2 of the Executive Summary shows that the CONS-1 amendments will achieve reductions of about 6.8 tons per day state wide (6.3 tons per day without the 12/31/09 Shaving gel, and 12/31/08 anti-static aerosol regs.. Page 21 states the cost of CONS-1 will be $2.40 per pound ($4,800 per ton). Since OTC's model rule is very similar to the CARB's rule, and emissions are proportional to population, CARB's 6.3 ton per day reduction was prorated to the OTC region based on the ratio of OTR 2002 population (63 million) to CA 2002 population (35 million) yielding approximately 11.3 tons per day in the OTR (4,139 tons per year).

Page 4 states that the estimated reductions from CONS-2 (not yet proposed) will achieve 20-35 tons per day statewide by 2010. Since OTC's model rule is very similar to the CARB's rule, and emissions are proportional to population, the mid-point of CARB's 20-35 ton per day reduction (i.e., 27.5 tons per day) was prorated to the OTC region based on the ratio of OTR 2002 population (63 million) to CA 2002 population (35 million) yielding approximately 49.5 tons per day in the OTR (18,068 tons per year).

CONTROL MEASURE SUMMARY FOR
Glass/Fiberglass Furnaces

Control Measure Summary:	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measure: NSR; PSD; State RACT.	**NOx** 2002 Base:	 18,840
Candidate measure: Use of oxyfiring or other methods to meet recommended emission limits. *Emission Reductions*: source specific, varies from 0-85% depending upon 2002 base rates. *Control Cost*: $ 924 to 2,232 per ton *Timing of Implementation*: 01/01/09 *Implementation Area*: OTR	**NOx** 2009 projected: Reduction at full implementation: Remaining after full implementation:	 21,893 -13,474 8,419

Control Measure Recommendation: Develop a control strategy that requires implementation of an "oxyfiring" program for each furnace at the next furnace rebuild. Alternatively, states may allow manufacturers to propose compliance methods based on California's San Joaquin Valley Rule 4354 which allows a mix of control options to meet specified emission limits. Prior to furnace rebuild, owners/operators may be allowed, by the state, to meet emissions limits by purchasing a state specified number of NOx allowances. Continuous emission monitoring systems would be used to determine emissions. This Measure should be modeled at 85% reduction.

Brief Rationale for Recommended Strategy: Oxyfiring is best implemented, and provides the most effective NOx emission reductions, with a complete furnace rebuild. This strategy not only reduces NOx emissions by as much as 85 percent, but reduces energy consumption, increases production rates by 10-15%, and improves glass quality by reducing defects. Oxyfiring is demonstrated technology and has penetrated into all segments of the glass industry.

REFERENCES

European Commission, Integrated Pollution Prevention and Control (IPPC) Bureau. *Reference Document on Best Available Techniques in the Glass Manufacturing Industry*. December 2001. This document reports 75 to 85% reduction in NOx and emission rates of 1.25 to 4.1 lbs NOx/ton. The cost effectiveness was determined to be $1,254 to $2,542 depending on the size of the furnace.

U.S. EPA *Alternative Control Techniques Document – NOx Emissions from Glass Manufacturing*, EPA-453/R-94-037, June 1994. Oxyfiring reduction of 85%, cost-effectiveness of $2,150 to $5,300.

Emission rates based on San Joaquin Valley Rule 4354

Type of Furnace	Block 24-hour Average	Rolling 30-day average
Container Glass	4.0 pounds of NOx per ton of glass pulled	4.0 pounds of NOx per ton of glass pulled
Fiberglass	4.0 pounds of NOx per ton of glass pulled	4.0 pounds of NOx per ton of glass pulled
Flat Glass	9.2 pounds of NOx per ton of glass pulled	7.0 pounds of NOx per ton of glass pulled

CONTROL MEASURE SUMMARY FOR

Industrial, Commercial, Institutional (ICI) Boilers – Jointly processed with MANE-VU

Addendum to OTC Resolution 06-02 Guidelines for ICI Boilers

ICI Boiler Size (mmBtu/hr)	Control Strategy/ Compliance Option	NOx Control Measure
5-25		Annual Boiler Tune-Up
25-100	Option #1	Natural Gas: 0.05 lb NOx/mmBtu #2 Fuel Oil: 0.08 lb NOx/mmBtu #4 or #6 Fuel Oil: 0.20 lb NOx/mmBtu Coal: 0.30 lb NOx/mmBtu**
	Option #2	50% reduction in NOx emissions from uncontrolled baseline
	Option #3	Purchase current year CAIR NOx allowances equal to reducted needed to acheiv the required emission rates
100-250	Option #1	Natural Gas: 0.10 lb NOx/mmBtu #2 Fuel Oil: 0.20 lb NOx/mmBtu #4 or #6 Fuel Oil: 0.20 lb NOx/mmBtu Coal: Wall-fired 0.14 lb NOx/mm Btu Tangential 0.12 lb NOx/mm Btu Stoker 0.22 lb NOx/mm Btu Fluidized Bed 0.08 lb NOx/mm Btu
	Option #2	LNB/SNCR, LNB/FGR, SCR, or some combination of these controls in conjunction with Low NOx Burner technology
	Option #3	60% reduction in NOx emissions from uncontrolled baseline
	Option #4	Purchase current year CAIR NOx allowances equal to reducted needed to acheiv the required emission rates
>250	Option #1	Purchase current year CAIR NOx allowances equal to reducted needed to acheiv the required emission rates
	Option #2	Phase I – 2009 Emission rate equal to EGUs of similar size Phase II – 2012 Emission rate equal to EGUs of similar size

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Fabric Printing

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Fabric Printing, Coating and Dyeing - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties EPA CTG RACT limit: 2.9 lbs VOC/gal coating [0.35 kg/liter] (minus H_2O & exempt solvents) Applicability: Sources 3 lbs/hour, 15 lb/day or 10 tons/year uncontrolled emissions OTC state RACT limits: MD, NJ, NH = 2.9 lbs/gal coating MA = 4.8 lbs VOC/gal of solids applied (equivalent to 2.9 lbs/gal coating)	**VOC** Actual 2002:	(not available)
Fabric Printing, Coating and Dyeing - 2009 On-the-Books measures: MACT Std. - Subpart OOOO (68 FR 32172, 5/29/03) EPA MACT limits <u>existing sources</u>: Coating and printing operations - 0.12 kg HAP/liter solids Dyeing and finishing operations - 0.016 kg HAP/liter solids Dyeing operations only - 0.016 kg HAP/liter solids Finishing operations only - 0.0003 kg HAP/liter solids *Emission Reductions*: *Nationwide – 60% HAP reduction from 1997 baseline* *MACT Organic HAP control efficiency option: 97% for existing sources* *MACT Estimated VOC reduction 60% (Pechan Table)* *Control Cost*: *Nationwide –$14.5 million/yr for 4,100 tons/yr = $3,537/ton* *Timing of Implementation*: Compliance Date (existing) May 29, 2006 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Fabric Printing, Coating and Dyeing Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID: Permanent Total Enclosure* *Emission Reductions*: *Estimated VOC reduction 95-97%* *(Air Control Net 3.0 Table)* *Control Cost*: *$1,459-$1,565/ton* *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*: (1) 8-hr ozone nonattainment areas, (2) 8-hr ozone nonattainment areas plus adjacent counties, or (3) all counties	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Large Appliances

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Large Appliances - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties; EPA CTG RACT limit: 2.8 lbs VOC/gal coating [0.34 kg/liter] (minus H_2O & exempt solvents)	**VOC** Actual 2002:	(not available)
Large Appliances - 2009 On-the-Books measures: MACT Std. – Subpart NNNN (67 FR 48254, 7/23/02) EPA MACT limits existing sources: 0.13 kg HAP/liter solids *Emission Reductions*: *Nationwide – 45% HAP reduction from 1995 baseline* *MACT Organic HAP control efficiency option: xx% for existing sources* *Estimated VOC reduction: 0% (Pechan Table) - 60%??* *Control Cost*: *Nationwide – $1.63 million/yr for 1,190 tons/yr = $1,370/ton* *Timing of Implementation*: Compliance Date (existing) July 23, 2005 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Large Appliances Candidate measure 1: Adopt More Stringent RACT regulations (e.g., ICAC letter 2/16/2001); lower applicability thresholds, extend geographic coverage *Measure ID:* *ICAC Option 1 - Nationwide – 80% HAP reduction from 1995 baseline (Additional 250 tons/per HAP)* *ICAC Option 2 - Nationwide – 98% HAP reduction from 1995 baseline (Additional 1,190 tons/per HAP)* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*: (1) 8-hr ozone nonattainment areas, (2) 8-hr ozone nonattainment areas plus adjacent counties, or (3) all counties	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation of: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Metal Cans

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Metal Can - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties; EPA CTG RACT limit: <u>lbs VOC/gal coating (minus H_2O&exempt solvents)</u> Sheet basecoat & over varnish 2.8 [0.34 kg/l] 2 and 3-piece can interior & 2-piece can 4.2 [0.50 kg/l] 3-piece can side-seam spray 5.5 [0.66 kg/l] End sealing compound 3.7 [0.44 kg/l] Applicability: 10 tons/year uncontrolled emissions OTC state RACT limits: MD, NJ, NH same limits as CTG; MA (4.5, 9.8, 21.8, 7.7 lbs/gallon of solids applied)	**VOC** Actual 2002:	(not available)
Metal Can - 2009 On-the-Books measures: MACT Std. – Subpart KKKK (68 FR 64432 , 11/13/03) EPA MACT limits <u>existing sources</u>: Sheet coating 0.03 kg HAP/l solids Body Coating 2-piece beverage cans 0.07 kg HAP/l solids 2-piece food cans 0.06 kg HAP/l solids 1-piece aerosol cans 0.12 kg HAP/l solids 3-piece can assembly Inside Spray 0.29 kg HAP/l solids Aseptic side seam strips on food cans 1.94 kg HAP/l solids Nonaseptic side seam strips on food cans 0.79 kg HAP/l solids Side seam strips on non-food cans 1.18 kg HAP/l solids Side seam strips on aerosol cans 1.46 kg HAP/l solids End sealing compound Aseptic end seal compounds 1.94 kg HAP/l solids Nonaseptic end seal compounds 0.00 kg HAP/l solids Repair spray coatings 2.06 kg HAP/l solids *Emission Reductions*: *Nationwide – 70% HAP reduction from 1997 baseline* *MACT Organic HAP control efficiency option: xx% for existing sources* *Estimated VOC reduction 70% (Pechan Table)* *Control Cost*: *Nationwide – $58.7 million/yr for 6,800 tons/yr = $8,632/ton* *Timing of Implementation*: Compliance Date (existing) Nov. 13, 2006 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)

Metal Can (Continued) Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID: Permanent Total Enclosure* *Emission Reductions*: *Estimated VOC reduction 95%* *(Air Control Net 3.0 Table)* *Control Cost*: *$7,947/ton* *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*: (1) 8-hr ozone nonattainment areas, (2) 8-hr ozone nonattainment areas plus adjacent counties, or (3) all counties.	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Metal Coils

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Metal Coil - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties; EPA CTG RACT limit: 2.6 lbs VOC/gal coating [0.31 kg/liter] (minus H_2O & exempt solvents) Applicability: Sources 10 tons/year uncontrolled emissions OTC state RACT limits: NH - same limits as CTG	**VOC** Actual 2002:	(not available)
Metal Coil – 2009 On-the-Books measures: MACT Std. – Subpart SSSS (67 FR 39794 , 6/10/02) EPA MACT limits existing sources: 0.046 kg HAP/liter solids *Emission Reductions*: *Nationwide – 53% HAP reduction from current levels?* *MACT Organic HAP control efficiency option: xx% for existing sources* *Estimated VOC reduction 53% (Pechan Table)* *Control Cost*: *Nationwide – $7.6 million/yr for 1,316 tons/yr = $5,775/ton* *Timing of Implementation*: Compliance Date (existing) June 10, 2005 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Metal Coil Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID:* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*: (1) 8-hr ozone nonattainment areas, (2) 8-hr ozone nonattainment areas plus adjacent counties, or (3) all counties.	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Metal Furniture

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Metal Furniture - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties EPA CTG RACT limit: 3.0 lbs VOC/gal coating [0.36 kg/liter] (minus H_2O & exempt solvents) Applicability: Sources 10 tons/year uncontrolled emissions OTC state RACT limits: NH - same limits as CTG	**VOC** Actual 2002:	(not available)
Metal Furniture – 2009 On-the-Books measures: MACT Std. – Subpart RRRR (67 FR 28606 , 5/23/03) EPA MACT limits <u>existing sources</u>: 0.10 kg HAP/liter solids *Emission Reductions*: *Nationwide – 73% HAP reduction from 1997/1998 baseline* *MACT Organic HAP control efficiency option: xx% for existing sources* *Estimated VOC reduction 0% (Pechan Table)* *Control Cost*: *Nationwide – $14.8 million/yr for 16,300 tons/yr = $908/ton* *Timing of Implementation*: Compliance Date (existing) May 23, 2006 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Metal Furniture Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID: Permanent Total Enclosure* *Emission Reductions*: *Estimated VOC reduction 95% (Air Control Net 3.0 Table)* *Control Cost*: *$20,115/ton* *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*: (1) 8-hr ozone nonattainment areas, (2) 8-hr ozone nonattainment areas plus adjacent counties, or (3) all counties.	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Miscellaneous Metal Parts

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Miscellaneous Metal Parts - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties EPA CTG RACT limit: <u>lbs VOC/gal coating (minus H_2O&exempt solvents)</u> Clear or transparent top coat 4.3 [0.52 kg/l] Air dries Coatings 3.5 [0.42 kg/l] Coating used in extreme environmental conditions 3.5 [0.42 kg/l] All other coatings 3.0 [0.35 kg/l] Applicability: 10 tons/year uncontrolled emissions OTC state RACT limits: NH same limits as CTG	**VOC** Actual 2002:	(not available)
Miscellaneous Metal Parts – 2009 On-the Books measures: MACT Std. – Subpart MMMM (69 FR 130 , 1/2/04) EPA MACT limits <u>existing sources:</u> General use Coating 0.31 kg HAP/l solids High Performance Coating 3.30 kg HAP/l solids Rubber-to-Metal Coating 4.50 kg HAP/l solids Extreme Performance Fluoropolymer 1.5 kg HAP/l solids *Emission Reductions*: *Nationwide – 48% HAP reduction from 1997 baseline* *MACT Organic HAP control efficiency option: xx% for existing sources* *Estimated VOC reduction 0% (Pechan Table)* *Control Cost*: *Nationwide – $57.3 million/yr for 26,000 tons/yr = $2204/ton* *Timing of Implementation*: Compliance Date (existing) Jan. 2, 2007 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Miscellaneous Metal Parts Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID:* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*:	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Paper and Other Web

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Paper & Other Web - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties EPA CTG RACT limit: 2.9 lbs VOC/gal coating [0.35 kg/liter] (minus H_2O & exempt solvents) Applicability: Sources 3 lbs/hour, 15 lb/day or 10 tons/year uncontrolled emissions OTC state RACT limits: MD, NJ, NH = 2.9 lbs/gal coating MA = 4.8 lbs VOC/gal of solids (equivalent to 2.9 lbs/gal coating)	**VOC** Actual 2002:	
Paper & Other Web – 2009 On-the-Books measures: MACT Std. – Subpart JJJJ (67 FR 72330 , 12/4/02) EPA MACT limits <u>existing sources</u>: 0.2 kg organic HAP/kg coating solids *Emission Reductions*: *Nationwide – 80% HAP reduction from current levels??* *MACT Organic HAP control efficiency option: 95% for existing sources* *Estimated VOC reduction 80% (Pechan Table)* *Control Cost*: *Nationwide – $64 million/yr for 34,500 tons/yr = $1,855/ton* *Timing of Implementation*: Compliance Date (existing) Dec. 5, 2005 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Paper & Other Web Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID:* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*:	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Plastic Parts

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Plastic Parts - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties EPA CTG RACT limit: lbs VOC/gal coating (minus H_2O&exempt solvents) Auto Interior / Auto Exterior High Bake Prime: 3.8 [0.46 kg/l] / -- High Bake Prime - Flexible: -- / 5.0 [0.60 kg/l] High Bake Prime – Nonflexible: -- / 4.5 [0.54 kg/l] High Bake Color: 4.1 [0.49 kg/l] / 4.6 [0.55 kg/l] Low Bake Prime: 3.5 [0.42 kg/l] / 5.5 [0.66 kg/l] Low Bake Color: 3.5 [0.42 kg/l] / 5.6 red or black Low Bake Color: -- / 4.5 all others Applicability: NH - 50 tons/year uncontrolled emissions OTC state RACT limits: NH - same limits as CTG	**VOC** Actual 2002:	(not available)
Plastic Parts - 2009 On-the Books measures: MACT Std. – Subpart PPPP (69 FR 20968 , 4/19/04) EPA MACT limits existing sources: General Use Coating - 0.16 kg HAP/kg coating solids Automotive Lamp Coating - 0.45 kg HAP/kg coating solids Thermoplastic Olefins - 0.26 kg HAP/kg coating solids New Assembled On-Road Vehicles - 1.34 kg HAP/kg coating solids *Emission Reductions*: *Nationwide – 80% HAP reduction from 1997 baseline* *Estimated VOC reduction 0% (Pechan Table)* *Control Cost*: *Nationwide – $10.9 million/yr for 7,560 tons/yr = $1,442/ton* *Timing of Implementation*: Compliance Date (existing) April 19, 2007 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Plastic Parts Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID:* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*:	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings Wood Building Products

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Wood Building Products - 2002 existing measures: NSPS; PSD/NSR; State RACT rules in 1-hour non-attainment counties EPA CTG RACT limit: lbs VOC/gal coating (minus H_2O&exempt solvents)	**VOC** Actual 2002:	(not available)
Wood Building Products - 2009 On-the-Books measures: MACT Std. – Subpart QQQQ (68 FR 31746 , 5/28/03) EPA MACT limits existing sources: - kg HAP/liter of solids (lb HAP/gal solids) Doors, Windows & Misc. 0.231 (1.93) Flooring 0.093 (0.78) Interior Wall Paneling & Tileboard 0.183 (1.53) Other Interior Panels 0.020 (0.17) Exterior Siding & Primed Door Skins 0.007 (0.06) *Emission Reductions*: *Nationwide – 63% HAP reduction from 1997 baseline* *MACT Organic HAP control efficiency option: xx% for existing sources* *Estimated VOC reduction 63% (Pechan Table)* *Control Cost*: *Nationwide –$22.5 million/yr for 4,900 tons/yr = $4,592/ton* *Timing of Implementation*: Compliance Date (existing) May 28, 2006 *Implementation Area*: Nationwide	**VOC** Actual 2002: OTB 2009: Reduction from OTB:	(not available)
Wood Building Products Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID:* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*:	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation of State/Workgroup Lead: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

CONTROL MEASURE SUMMARY FOR
Industrial Surface Coatings All Categories

Control Measure Summary: This category includes several source types: Fabric, Printing, Coating and Dyeing; Large Appliances; Metal Can coating, Metal Coil coating; Metal Furniture coating; Misc. Metal Parts coating; Paper and Other Web coating; Plastic Parts coating; & Wood Building Products coating	**Emissions (tons/year) in Ozone Transport Region**	
Industrial Surface Coatings Category Total - 2002 existing measures: NSPS: PSD/NSR; State RACT rules in 1-hour non-attainment counties	**Total VOC** **Point &Area** Actual 2002:	164,445
Industrial Surface Coatings Category Total - 2009 On-the-Books measures: MACT Stds. – Subpart OOOO (68 FR 32172, 5/29/03) Subpart NNNN (67 FR 48254, 7/23/02) Subpart KKKK (68 FR 64432 , 11/13/03) Subpart SSSS (67 FR 39794 , 6/10/02) Subpart RRRR (67 FR 28606 , 5/23/03) Subpart MMMM (69 FR 130 , 1/2/04) Subpart JJJJ (67 FR 72330 , 12/4/02) Subpart PPPP (69 FR 20968 , 4/19/04) Subpart QQQQ (68 FR 31746 , 5/28/03) *Emission Reductions*: *OTC Regional – x,xxx from 2002 baseline* *Control Cost*: *OTC Regional –$ xx.x million/yr for x,xxx tons/yr = $4,592/ton* *Timing of Implementation*: Compliance Dates (existing) 5/29/06; (existing) 7/23/05; (existing) 11/13/06; (existing) 6/10/05; (existing) 5/23/06; (existing) 1/2/07; (existing) 12/5/05; (existing) 4/19/07; (existing) 5/28/06 *Implementation Area*: Ozone Transport Region	**Total VOC** **Point & Area** Actual 2002: OTB 2009: Reduction from OTB: **MANE-VU 2002 Point*** **MANE-VU 2002 Area*** **(Ed Sabo's e-mail 01/06/06)**	164,445 -175,983 **-11,448** **24,931** **139,512** **From 10/04/05 draft emission inventory**
Industrial Surface Coatings Category Total Candidate measure 1: Adopt More Stringent RACT regulations; lower applicability thresholds, extend geographic coverage *Measure ID:* *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*:	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	(not available)
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy: See additional discussion in briefing paper		

Background Information

Industrial surface coatings are used during the manufacture of a wide variety of products including: fabrics, paper, large appliances, metal cans, metal coils, metal furniture, metal parts, plastic parts, and wood building materials. Surface coating is the process by which paints, inks, varnishes, adhesives or other decorative or functional coatings are applied to a substrate (e.g., fabric, metal, wood, or plastic) to protect or decorate the substrate. Industrial surface coatings can be applied by brushing, rolling, spraying, dipping, flow coating, electro-coating, or combinations and variations of these methods. The process used to coat a particular product is dependent on the composition of the coating, the substrate to which the coating is applied and the intended end use of the final product. After a coating is applied, it is dried or cured either by conventional curing through the use of thermal drying ovens, or through the use of radiation. During conventional curing, heat from thermal ovens is used to evaporate the solvents and/or water trapped in the coating and release them into the atmosphere. Two types of radiation curing processes currently in use are ultraviolet (UV) curing and electron beam (EB) curing.

Emissions are released by the evaporation of the solvents used in the coatings and the evaporation of any additional solvents used to dilute (thin) the coating prior to application and for cleaning the coating equipment after use. Emissions from surface preparation and coating applications are a function of the VOC content of product used. Emissions are also a function of the type of coating process used (rolling, dipping, spraying, etc.) and the transfer efficiency of the process. Transfer efficiency is the percentage of the coating solids that are applied (e.g., sprayed) which actually adhere to the surface being coated. Emissions from cleaning vary with the type of cleanup and the housekeeping practices used.

Industrial surface coating is estimated to account for approximately 164,000 tons per year of VOC emissions in the Mid-Atlantic/Northeast Visibility Union (MANE-VU) region in 2002 from both point and area sources. It is important to consider two aspects regarding the accuracy of this emissions estimate when assessing this category for additional controls:

1) The MANE-VU VOC emissions inventory for the industrial surface coating category includes emissions from both point and area sources. While the 2002 VOC emissions inventory for the MANE-VU region indicates that VOC emission from area sources in this category are substantial, the area source part of the emissions inventory is highly uncertain and may be substantially overestimated. The method used to estimate area source VOC emissions relies heavily on employee emission factors and employment data. These emission factors are based on data collected by EPA in the 1980s and may not accurately portray the types of coatings, the type of coating equipment, or the type of control technology currently in use.

2) At least nine types of industrial surface coating point sources are already controlled due to state specific VOC RACT regulations or will soon be controlled prior to 2009 as a result of the recently promulgated Maximum Achievable Control Technology (MACT) standards. Since the MACT standards were designed to control air toxic emissions and not necessarily VOC emissions the effectiveness of the MACT standards for controlling VOC emissions will vary with the industrial surface coating subcategory (e.g., metal cans, wood building products, etc.) and the type of coating equipment and the type of solvents used in that subcategory.

Regulatory History

Industrial surface coating processes are currently subject to multiple state and federal regulations pursuant to Titles I and III of the Clean Air Act. Title I imposes Standards of Performance for New Stationary Sources (NSPS) on new and modified large stationary sources. In the early 1990s, EPA promulgated NSPSs for various types of industrial surface coating operations. These regulations applied

to surface coating operations that were constructed or modified after effective dates specified in each NSPS. In general, surface coating operations constructed or modified after 1980 are subject to NSPS requirements. The NSPS generally established VOC emission rate limits that could be complied with using either compliant coatings or add-on capture and control equipment. For certain source categories the NSPS also set transfer efficiency requirements.

New and modified large stationary sources that increase their emissions can also be subject to the New Source Review (NSR) requirements of Title I. NSR requires a control technology review for large new plants and for modifications at existing plants that result in a significant increase in emissions, subjecting these sources to Best Available Control Technology (BACT) in attainment areas and Lowest Achievable Emission Rate (LAER) in nonattainment areas. BACT and LAER control requirements are updated over time to reflect improvements in control equipment and are reviewed on a case-by-case basis during state permitting process.

Criteria pollutants, which include VOCs, nitrogen oxides (NOx), sulfur dioxide (SO_2), fine particulate matter (PM_{fine}), carbon monoxide (CO) and lead (Pb), are also regulated by the State Implementation Plans (SIPs) required by Title I. SIPs set forth the states' strategies for achieving reductions of criteria pollutants for which the state is currently out of attainment. SIPs must include requirements that all major stationary sources located in nonattainment areas must install reasonably available control technology (RACT). RACT levels must be basedon the level of emissions reduction that can be reasonably achieved at a reasonable cost. The U.S. EPA has issued a series of Control Technology Guidelines (CTGs) and Alternative Control Technologies (ACT) documents to assist states in defining RACT for a number of industrial surface coating categories. For categories not covered by a CTG or ACT document, state regulations require that a case-by-case RACT determination be made. Most of the EPA's CTGs and ACT documents for the industrial surface coating category were developed prior to 1990. While specific RACT requirements will vary from state to state, some OTC states have already adopted RACT regulations that are more stringent than the CTG/ACT requirements.

Policy Recommendation

As can be noted from the background information, the regulatory history, and the information contained in summary tables, the industrial surface coatings category includes at least nine different major source types and multiple processes for each source type with regulations and emissions limits that vary not only by major source type, but also by individual process and individual product. In addition, the industrial surface coatings category is already subject to a variety of regulations (NSPS; PSD/NSR, state RACT, MACT, state specific rules on hazardous air pollutants) that were adopted to achieve different goals. Some regulations (e.g., RACT) were designed to reduce VOC emissions. Other regulations (e.g., MACT) were designed to reduce emissions of hazardous air pollutants but have the side benefit of reducing VOC emissions as well.

Analysis of the potential benefits and costs of adopting additional VOC control measures, Beyond On-The-Way (BOTW) measures) is further complicated by the following:

1) Uncertainty as to the accuracy of the current (2002) MANE-VU VOC emissions inventory for the industrial surface coatings category;
2) Difference in current VOC RACT limits among the OTC states;
3) Difference in the estimates of the potential VOC reductions from MACT standards; and
4) Difference in the source size and geographic area covered by a specific regulation.

The most recent version of the (2002) MANE-VU VOC emissions inventory for the MANE-VU region estimates total VOC emissions from the industrial surface coatings category to be 164, 445 tons (24,931 tons of VOC from point sources and 139,512 tons from area sources). Further investigation into the amount of VOC emissions from area sources will most likely reveal that these VOC emissions are

substantially overestimated due in part to the emission factors and employment data used and in part to the cutpoints used by various states for distinguishing a point source from an area source.

A quick sampling of the current VOC RACT limits in the OTC states reveals differences not only in the limits for existing sources (lbs. VOC per gallon of coating minus water and exempt solvents), but also in the size of source to which these limits apply.

Several complications arise when trying to calculate the potential VOC reductions from a particular MACT standard including the following:

1) Not all toxics regulated under the MACT are VOCs;
2) MACT standards are expressed as kg HAP/liter of solids or lbs. HAP/gallon of solids not lbs. VOC/gallon of coating minus water and exempt solvent so the MACT limit applies to all HAPs not just VOCs; and
3) The specific types of processes and coatings regulated under the MACT standards are different than the types of processes and coatings regulated under the RACT standards.

These complications have lead to widely varying estimates of the potential additional VOC reductions from the application of a particular MACT requirement (from 0% to as much as 80% VOC reduction nationwide).

RACT standards and MACT standards apply to sources located in different geographic areas throughout the Ozone Transport Region. For some OTC states RACT standards apply only to sources located in 1-hour ozone nonattainment counties while in other OTC states RACT standards apply statewide. MACT standards are applicable nationwide and only to major HAP sources (10 tons/year of individual HAP or 25 tons/year of combined HAPs).

Given all of these uncertainties the following options are available:

1) OTC states that currently have higher VOC RACT limits than the EPA CTG/ACT VOC RACT limits can adopt more stringent RACT regulations;
2) OTC states can extend the geographic coverage for RACT limits to statewide;
3) OTC states can lower the RACT applicability thresholds
4) OTC states can adopt more stringent control requirements for specific industrial surface coating categories (e.g., permanent total enclosures for metal can coating processes).

Policy recommendations:

1) Due to uncertainty in current MANE-VU VOC emissions inventory for this category, develop an improved, state specific VOC emissions inventory for point and area sources for each subcategory of industrial surface coatings before requiring additional controls beyond MACT.

CONTROL MEASURE SUMMARY FOR
Lime Kilns

Control Measure Summary: Good combustion practices and kiln operation for Lime Kilns. These kilns are used for the calcination of limestone. Lime kilns are also often associated with paper mills.	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measure: NSR; PSD; State RACT. *Emission Reductions*: *Control Cost*: *Timing of Implementation*: *Implementation Area*: OTR	**NOx** Uncontrolled: 2002 Reduction: 2002 Base:	 4,649 0 4,649
Candidate measure: Good combustion practices and kiln operation *Emission Reductions*: Under Evaluation *Control Cost*: less than $2,000 per ton *Timing of Implementation*: 01/01/09 *Implementation Area:* OTR	**NOx** 2009 Base including growth: 2009 Reduction: 2009 Remaining:	 5,228 TBD
Policy Recommendation: Final recommendation not made as of June, 2006.		
Recommended Strategy: See additional discussion in briefing paper		

REFERENCES:

European Commission, Integrated Pollution Prevention and Control (IPPC) Bureau. *Reference Document on Best Available Techniques in the Cement and Lime Manufacturing Industries*. December 2001. "The direct transfer of low-NOx burner technology from cement kilns to lime kilns is not straightforward. In cement kilns, flame temperatures are higher and low-NOx burners have been developed for reducing high initial levels of 'thermal NOx'. In most lime kilns the levels of NOx are lower and the 'thermal NOx' is probably less important."

Northeast States for Coordinated Air Use Management. *Assessment of Control Technology Options for BART-Eligible Sources: Steam Electric Boilers, Industrial Boilers, Cement Plants, and Paper and Pulp Facilities*. March 2005. "Due to the design of the lime kiln, SNCRs and SCRs are not viable NOx reduction techniques. Installing low-NOx burners is also not a practical NOx reduction technique according to a BACT analysis conducted on a new lime kiln in 1997…combustion modification such as decreasing excess air is the best way to reduce NOx emissions".

CONTROL MEASURE SUMMARY FOR
Municipal Waste Combustiors
(Only NOx reductions are evaluated under this strategy)

Control Measure Summary	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measure: Federal performance standards and emissions guidelines for large MWCs (40 CFR 60 Subparts Cb and Eb). No control technology is mandated to meet the emissions limitations. EPA approved state trading programs for NOx compliance are allowed as is facility-wide averaging for NOx compliance. *Emission Reductions*: 19,000 Mg NOx/yr nationally (increment over 1991 40 CFR 60 Subpart Ca standards). *Control Cost*: $7.2 per Mg municipal solid waste combusted. *Timing of Implementation*: Compliance required December 19, 2000. *Implementation Area*: Nationwide.	**NOx** 2002 Base:	26,139
	SO2: **2002 Base**	3,865
	VOC: **2002 Base**	473
Implement Federal Rules: *Measure ID:* *Emission Reductions*: Varies per state depending on the number of MWC units, incinerator technology and chosen emissions limitations. In Connecticut, this measure resulted in NOx emissions reductions of 1.6 tons/summer day and 592 tons/year. *Control Cost*: $0 to approximately $1,500/MMBtu/hr depending on whether SNCR was installed in response to the federal emissions guidelines and whether SNCR is feasible. *Timing of Implementation*: Assuming timely adoption of state rule amendments, compliance with emissions limitations could be required by May 1, 2009. *Implementation Area*: Maine, Maryland, Massachusetts, New Hampshire, New Jersey, New York and Pennsylvania report operating MWC units (assuming state NOx emissions limitations are at the level of the federal emissions guidelines).	**NOx** 2009 Reduction: 2009 Remaining:	 <u>-3,610</u> 22,529
	SO2	***
	VOC	***

Policy Recommendation of State/Workgroup Lead:
Individual states with operating MWCs should evaluate the possible reduction of state NOx emissions limitations to produce creditable emissions reductions. At the regional level, this strategy should not be emphasized as it is state-specific in nature (depending on the MWC population, current control level and current state standards); does not require regional implementation to maximize its effectiveness; emissions from MWCs are a minor portion of the regional inventory given MACT-based standards required under Section 129 of the Clean Air Act; and EPA has proposed more stringent NOx emission limits for MWCs that states will be required to adopt and implement as of April 2009.

Recommended Strategy:
MWCs are subject to stringent MACT emissions standards, including standards for NOx, under Section 129 of the Clean Air Act. To comply with these MACT standards, many MWC owners and operators installed control technologies, including SNCR, to comply with the federal deadline of December 19, 2000. Many MWCs may be operated to reduce emissions to a level below the current federal standards. For example, Connecticut includes a state NOx emission reduction credit (ERC) trading program in its MWC rule. Recognizing that the "excess emissions" produced in Connecticut's MWC NOx ERC trading program could yield creditable emissions reductions if the required NOx emissions limits were reduced, in October 2000, the Department amended the state MWC rule to require the MWC owners and operators to meet more stringent NOx emissions limits as of May 1, 2003. The resulting emissions reductions of 1.62 tons of NOx per summer day (248 tons per ozone season) were used for compliance with the "shortfall" emission reduction obligation

needed for EPA approval of the attainment demonstration for the 1-hour ozone national ambient air quality standard.

Other states in the OTC region have operating MWC units that now comply with MACT-based state emissions limitations. Many MWC units now operate with SNCR to control NOx emissions. For MWC units that do not now have SNCR, SNCR is likely a feasible RACT measure capable of reducing NOx emissions below the state limits. Thus, the reduction of the state MWC NOx limits may produce creditable NOx emissions reductions. Furthermore, since MWCs are not subject to the Clean Air Interstate Rule (CAIR) and may not participate in a CAIR NOx trading program, reduction of state MWC NOx emissions limitations could be considered an equity measure that places MWC owners in a position similar to the owners of large electric generating units subject to CAIR. However, the amount of creditable emissions reductions a state may obtain from this strategy is limited given EPA's December 19, 2005 proposal of reduced emissions limitations for MWCs.

BACKGROUND INFORMATION

In December 1995, EPA adopted new source performance standards (NSPS) (40 CFR 60 subpart Eb) and emission guidelines (subpart Cb) for MWC units with a combustion capacity greater than 250 tons per day. Both the NSPS and emission guidelines require compliance with emission limitations for nine pollutants including NOx that reflect the performance of maximum achievable control technology (MACT). The emission guidelines required compliance by December 2000 for all existing MWCs, while the NSPS apply to new MWCs. On December 19, 2005, EPA proposed revisions to the emissions guidelines to reflect the levels of performance achieved due to the installation of control equipment (70 FR 75348). This proposal includes reduced NOx emissions limitations that states will be required to adopt and implement by April 2009, if the proposal is finalized. Selective non-catalytic reduction (SNCR) is considered MACT for NOx under both the 1995 guidelines and the 2005 proposal.

Connecticut's MWC regulation, section 22a-174-38 of the Regulations of Connecticut State Agencies (R.C.S.A.) (Attachment A), was adopted in June 1999 with NOx emissions limits equivalent to the federal emissions guidelines (Phase I NOx limits). Owners and operators of the state's 15 MWC units were required to comply with the emissions limits no later than December 19, 2000. R.C.S.A. section 22a-174-38 was amended in October 2000 to include more stringent NOx emissions limits (Phase II NOx limits), for which compliance was required no later than May 1, 2003. The following NOx emissions reductions, relative to emissions levels under the Phase I NOx limits, are attributed to the Phase II NOx limits in Connecticut:

- 592 tons per year;
- 248 tons per ozone season; and
- 1.62 tons per day during the ozone season.[1]

EPA's December 19, 2005 proposal to update the 1995 emissions standards will substantially reduce the ability of other states to achieve the same level of emissions reductions that Connecticut achieved by implementing this measure in 2003.

Add-on NOx Control

The number of NOx-reduction technologies for MWCs are limited as these units use a heterogeneous, wet fuel; are less thermally efficient than fossil fuel-fired boilers of comparable heat input; and require larger amounts of excess air and less densely-packed heat recovery systems. Low-NOx burners, fuel switching and load curtailment are not possible control options.

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[1] Assumes 100% rule effectiveness, which is reasonable given that the MWCs are operated with continuous emissions monitoring.

The only generally applicable and feasible add-on control technology for reducing NOx emissions from MWCs is SNCR.[2] SNCR is a chemical process for removing NOx from flue gas. In the SNCR process, a reagent, typically liquid urea or anhydrous gaseous ammonia is injected within a boiler or in ducts in a region where the temperature is between 900 and 1100 degrees Celsius. The reaction converts NOx to nitrogen gas and water vapor. SNCR performance depends on factors specific to each type of combustion equipment, including flue gas temperature, residence time for the reagent and flue gas, amount of reagent injected, reagent distribution, uncontrolled NOx level and carbon monoxide and oxygen concentrations.

Some disadvantages arise from the use of SNCR including: the high operating temperatures required; ineffectiveness at high temperatures with low concentrations of NOx; the need to accommodate enough residence time to complete the chemical reaction at high temperatures; and undesirable excess ammonia and urea emissions ("ammonia slip") that arise from an incomplete chemical reaction (Thermal Energy International, 2000).

All of Connecticut's large MWC units are equipped with SNCR, including nine mass burn/waterwall units and three refuse-derived fuel units. Two tire-fired units subject to the state MWC rule also operate with SNCR.[3] Similarly, all of New Jersey's large MWC units are equipped with SCR to meet NOx emissions limitations based on the federal emissions guidelines.

Cost

The capital cost of installing SNCR on a MWC unit is approximately $1,500 MMBtu/hr (see, e.g., Institute of Clean Air Companies, 2000).[4] Most of the cost of using SNCR is in operating expenses (Institute of Clean Air Companies, 2000), which EPA estimates as falling between 680 and 1,200 $/MMBtu (1993 dollars). Thus, SNCR is well suited for seasonal control in that it may provide significant reductions in NOx emissions but incurs little cost when the system is not in use. EPA has assigned an ozone season cost effectiveness to SNCR operated on MWC units of $2,140 per ton of NOx reduced (1990 dollars)(EPA, 1999, Table 16).

Emissions reductions

In Connecticut, MWC facility owners report emissions reductions of 25 to 50% from the operation of SNCR; a typical reduction of 35-40% could be assumed from the installation and operation of SNCR/ammonia injection to MWC units of similar size and type. Other combustors of varying technologies and capacities but with similar baseline NOx emissions have reported reductions ranging from 35 - 75% from the operation of urea-based SNCR (Appendix 1, Institute of Clean Air Companies, 2000). EPA assigns a typical 45% emission reduction to the effectiveness of SNCR at MWCs (EPA, 1999, Table 16).

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[2] The use of SCR to control NOx emissions from MWCs in North American is limited to very few units (see, e.g., http://www.region.peel.on.ca/pw/waste/facilities/algonquin-power.htm) because the nature of municipal solid waste requires huge SCR reactor sizes and significant actions to prevent catalyst poisoning. These factors, combined with the relatively small size of most MWCs, makes the use of SCR prohibitively expensive (EPA 2005, comment by IWSA).

[3] Connecticut also has three mass burn refractory units that are classified as small MWCs and do not use SNCR.

[4] For comparison, EPA places the capital cost of SNCR between 1,600 and 3,300 $/MMBtu (1993 dollars). In 2002, the 3-unit facility (140 MMBTU/hr per unit) owned by the Connecticut Resources Recovery Authority in Bridgeport, Connecticut installed SNCR on all three units at a capital cost of $2.1 million.

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U.S. Environmental Protection Agency. November 1999. Nitrogen Oxides (NOx), *Why and How They are Controlled*. Clean Air Technology Center: EPA 456/F-99-006R.

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U.S. Environmental Protection Agency. December 19, 2005. *Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Large Municipal Waste Combustors; Proposed Rule*. 70 FR 75348.

CONTROL MEASURE SUMMARY FOR
Printing and Graphic Arts

Control Measure Summary: This category includes categories of both heat set and non-heat set operations. It includes lithographic, gravure, flexographic and screen printing. It includes both point sources and area sources.	**Emissions (tons/year) in Ozone Transport Region**	
2002 existing measures: RACT, BACT, NSPS	**VOC Point** Actual 2002 **VOC Area** Actual 2002:	 5,501 31,738
2009 On-the-Books measures: MACT Std. - Subpart KK Publication rotogravure – limit organic HAP emissions to no more than 8% of volatile matter used each month. Either reformulation or 92% capture and control efficiency. Product and packaging rotogravure and wide-web flexo – limit organic HAP emissions to no more than 5% of volatile matter used each month. Either reformulation or 95% capture and control efficiency. *Emission Reductions*: *Control Cost*: *Timing of Implementation*: Compliance Date (existing) December 5, 2005 *Implementation Area*: Nationwide	**VOC Point** Actual 2002: 2009 Reduction: 2009 Remaining: **VOC Point** Actual 2002: 2009 Reduction: 2009 Remaining:	 5,501 -121 5,380 31,738 -0 31,738
Candidate measure: Adopt the requirements of SCAQMD rule 1130 and 1130.1 *Emission Reductions*: Under evaluation *Control Cost*: Under evaluation *Timing of Implementation*: Assuming 2007 or 2008 effective date of rule, emission reductions in 2009 or 2010 *Implementation Area*: OTR	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	 Under review
Candidate measure: Same option as CM1, except potentially require that publication, packaging and product rotogravure and wide web flexo printers that are equipped with capture and control equipment, meet the capture and control efficiency requirement in the MACT standard for VOC reductions (this would apply to facilities not major for HAPs). *Implementation Area:* OTR	**VOC** OTB 2009: BOTW 2009: Reduction from BOTW:	 Under review
Candidate measure: Adopt September 2006 CTGs. In September 2006, EPA determined that control technique guideline (CTG) documents will be substantially as effective as national regulations in reducing VOC emissions in ozone nonattainment areas from the following Group II product categories: lithographic printing materials, letterpress printing materials, and flexible packaging printing materials *Implementation Area:* OTR		Under Review
Policy Recommendation: Final recommendation not made as of June, 2006.		
Brief Rationale for Recommended Strategy:		

CONTROL MEASURE SUMMARY FOR
Portable Fuel Containers

Control Measure Summary: Portable Fuel Containers This control measure establishes design and manufacturing specifications for portable fuel containers (PFCs) based on the California Air Resources Board (CARB) rules. PFCs are used to refuel residential and commercial equipment and vehicles. PFCs are used to refuel a broad range of small off-road engines and other equipment (e.g., lawnmowers, chainsaws, personal watercraft, motorcycles, etc.).	**VOC Emissions in Ozone Transport Region**	
2002 Existing Measure: None	2002 Annual: 2002 Summer:	99,919 tpy 315.3 tpd
2009 On-the-Books Measure: Adopt the OTC Model Rule for PFCs, which is based on the 2000 CARB rule for PFCs. *Emission Reductions*: Based on a CE=65%, RE=100%, RP=based on the number of years the rule has been in place based on the assumed 10-yr turnover of the sale of the cans, and Total control = 65% when fully implemented after 10 years. *Control Cost*: $581 per ton *Timing of Implementation*: State specific with a 10% per year turnover, full reductions are achieved after 10 years. CARB, and the EPA, have estimated a 5 year turnover for the cans, but the OTC used a more conservative 10 year turnover in calculating emission reductions. *Implementation Area*: OTR	**Annual:** 2009 Reduction: 2009 Remaining: **Summer:** 2009 Reduction: 2009 Remaining:	 33,055 tpy 66,864 tpy 107.1 tpd 208.2 tpd
2009 On-the-Way Measure: Proposed Federal HAP Mobile Source Reg (Feb 28, 2006) Rule – This rule proposes to regulate PFCs similar to CARBs 2006 rule amendments and will regulate permeability to 0.3 grams of HC per gallon per day (2001 OTC Model Rule has 0.4 grams per gallon per day). It does not contain CARBs amendments regarding kerosene containers and utility jugs. *Emission Reductions*: EPA estimates about a 9% reduction nationwide in 2009 and a 61% reduction when fully implemented after 5 years. *Control Cost*: $180 per ton without fuel savings; over the long term, fuel savings outweigh costs. *Timing of Implementation*: Jan.1, 2009 effective date of rule and 20% per year turnover, full reductions are achieved after 5 years, in 2014. *Implementation Area*: Nationwide	**Annual:** 2009 Reduction: 2009 Remaining: **Summer:** 2009 Reduction: 2009 Remaining:	 negligible 66,864 tpy negligible 208.2 tpd
Candidate measure: Adopt the CARB 2006 amendments broadening PFC definition to include kerosene containers and utility jugs, increasing the permeability requirement from 0.3 grams of hydrocarbons per gallon per day to 0.4 grams of hydrocarbons per gallon per day, and other changes needed to make the OTC Model Rule consistent with CARB *Emission Reductions*: CARB estimates their amendments are expected to reduce ROG emissions by 58% after full penetration into the marketplace, assumed to be 5 years. *Control Cost*: CARB estimate is $800 to $1,400 per ton reduced *Timing of Implementation*: State specific with a 10% per year turnover, full reductions are achieved after 10 years *Implementation Area:* OTR	**Annual:** 2009 Base: 2009 Reduction: 2009 Remaining: **Summer:** 2009 Base: 2009 Reduction: 2009 Remaining:	 66,864 tpy 4,152 tpy 62,712 tpy 208.2 tpd 12.8 tpd 195.4 tpd

Summary of Candidate Measure:
The California Air Resources Board (CARB) 2000 PFC regulation establishes design and manufacturing specifications for PFCs. PFC emissions are calculated by accounting for emissions from five different components related to gas container use: permeation, diurnal, transport-spillage, refueling spillage and refueling vapor displacement emissions. The permeation, diurnal emissions (associated with storage) and transport-spillage emissions are included in the area source inventory. The equipment refueling spillage and refueling vapor displacement emissions are calculated from the non-road model and are included in the non-road inventory. After four years of implementation and a comprehensive assessment of the program, CARB staff identified some problems with the rule related to consumer acceptance and reducing anticipated emission reductions. Their 2006 amendments address these issues, as well as expanding on the regulation to increase emission reductions. The amendments include the following:

1. Eliminate the requirement for an auto shutoff.
2. Eliminate fuel flow rate and fill level standards.
3. Eliminate one opening standard.
4. Reduce pressure standard from 10 psig to 5 psig.
5. Establish a certification program for PFCs.
6. Expand the definition of a PFC to include utility jugs and kerosene containers. CARB staff determined that consumers were using these containers for gasoline.
7. Change permeability standard from 0.4 grams ROG /gallon-day to 0.3 grams/gallon-day.
8. Combine the evaporation and permeation standards into a new diurnal standard to simplify certification and compliance testing.
9. Adopt new PFC test procedures.
10. Include a voluntary Consumer Acceptance Program to support and encourage user-friendly PFC designs (i.e., allowing the use of the ARB Star Rating system to clearly identify superior designs as determined by users).

While ARB staff does not expect these changes to affect the cost of gasoline cans, the price of kerosene cans could rise to as much as $8.50 per container once the regulations are implemented. CARB also estimates the cost-effectiveness to be between $0.40 to $0.70 per pound.

Recommended Strategy: CARB, through their comprehensive history of research and multiple product surveys, have the best technical data available to create rules to regulate portable fuel containers. Most portable fuel container manufacturers market their products nationally, therefore many will be selling the new products nationally after they have produced cans than conform with the CARB rules. The CARB rule contains some revisions to their original rule to ease consumer acceptance of the cans, for states that have adopted the original OTC model rule. In addition the CARB rule amendments regulate kerosene cans and utility jugs, which the Federal rule proposal does not.

References:

2009 On-the-Books Measure (OTC Model Rule):

E.H. Pechan & Associates, Inc., *Control Measure Development Support Analysis of Ozone Transport Commission Model Rules*, March 31, 2001. Much of the analysis in this report was based on CARB's analysis for CARB's original 1999 PFC rule , which estimated a 75% reduction that would be fully achieved after 5 years (CARB's assumed life cycle for PFCs). The OTC used a more conservative 10-year turnover rate in its analysis. Table II-5 of the Pechan report shows the cost of compliance to be $581/ton.

2009 On-the-Way Measure (Proposed 2/28/06 Federal Rule):

U.S. EPA Office of Transportation and Air Quality. *Estimating Emissions Associated with Portable Fuel Containers (PFCs), Draft Report*, EPA420-D-06-003, February 2006.

U.S. EPA Office of Transportation and Air Quality. *Draft Regulatory Impact Analysis: Control of Hazardous Air Pollutants from Mobile Sources*, EPA420-D-06-004, February 2006.

Candidate Measure (CARB 2006 Amendments):

California Air Resources Board. *Final Statement of Reasons for Rulemaking, Including Summary of Comments and Agency Response: PUBLIC HEARING TO CONSIDER AMENDMENTS TO THE PORTABLE FUEL CONTAINER REGULATIONS.* September 15, 2005.

California Air Resources Board. *Initial Statement of Reasons for Proposed Amendments to the Portable Fuel Container Regulations.* July 29, 2005. Table 5.1 shows the cost-effectiveness of the proposed amendments to be $0.40 to $0.70 per pound ($800 to $1,400 per ton)

CONTROL MEASURE SUMMARY FOR
Regional Fuel

Control Measure Summary: The OTR proposes a common fuel standard for the OTR states that does not require MTBE or Ethanol, but exhibits Environmentally Beneficial Combustion Properties.	**NOx Emissions (tons/summer day) in OTR**	
2002 existing measure: Federal program in the CAA requiring RFG in certain non-attainment areas and allowing other states with non-attainment areas to opt-in. All but two states in the OTR are participating, in whole or in part, with the federal program, however nearly 1/3 of the gasoline sold in the OTR is not RFG.		
Candidate measure: *Measure ID:* OTR-wide Regional Fuel *Emission Reductions*: *Control Cost*: unknown at this time *Timing of Implementation*: *Implementation Area*: All states in the OTR	NOx VOC	~ 4.8 tpsd ~ 139.4 tpsd
Policy Recommendation: Continue to examine the potential for a regional fuel, keeping in mind that some states like PA may have statutory/legislative constraints.		
Brief Rationale for Recommended Strategy: The Energy Policy Act of 2005 provides the opportunity for the OTR to achieve a single clean-burning gasoline without MTBE, as it also eliminates the oxygen content requirement for RFG. The authority provided in Energy Act is consistent with what states promoted through the long debate over MTBE/ethanol/RFG. Approximately one-third of the gasoline currently sold in the OTR is not RFG; most is conventional gasoline. The new authority plus the potential for emission reductions from the amount of non-RFG sold in the OTR provides an opportunity for additional emission reductions in the region as well as for a reduced number of fuels, and possibly a single fuel, to be utilized throughout the region.		

Appendix D – VOC Emissions by County for 2002 and 2009

Table D-1 Adhesives and Sealants VOC Area Source Emission Summary for 2002 and 2009 by County

Table D-2 Adhesives and Sealants VOC Point Source Emission Summary for 2002 and 2009 by County

Table D-3 Cutback and Emulsified Asphalt Paving VOC Area Source Emission Summary for 2002 and 2009 by County

Table D-4 Consumer Products VOC Area Source Emission Summary for 2002 and 2009 by County

Table D-5 Portable Fuel Containers VOC Area Source Emission Summary for 2002 and 2009 by County

Table D-6 Portable Fuel Containers VOC Nonroad Source Emission Summary for 2002 and 2009 by State

Table D-7 Reformulated Gasoline Emission Summary by State

Due to their large size, these tables are being transmitted electronically in the spreadsheet named Appendix_D_VOC_2009.xls. There are separate tabs for each of the tables listed above.

Appendix E – NOx Emissions by County for 2002 and 2009

Table E-1 Reformulated Gasoline Emission Summary by State

Table E-2 Chip Reflash Emission Summary by State

Table E-3 Asphalt Production Plant NOx Emission Summary for 2002 and 2009 by County

Table E-4 Cement Kiln NOx Emission Summary for 2002 and 2009 by County

Table E-5 Glass and Fiberglass Furnace NOx Emission Summary for 2002 and 2009 by County

Table E-6 ICI Boiler NOx Area Source Emission Summary for 2002 and 2009 by State

Table E-7 ICI Boiler NOx Point Source Emission Summary for 2002 and 2009 by State

Due to their large size, these tables are being transmitted electronically in the spreadsheet named Appendix_E_NOx_2009.xls. There are separate tabs for each of the tables listed above.

Appendix F – State ICI Boiler Regulations

Due to their large size, these tables are being transmitted electronically in the spreadsheet named Appendix F State ICI Regs.xls. There are separate tabs for each state. In the final report, these tables will be provided in electronic format

Department of Environmental Conservation
Division of Air Resources

NEW YORK
STATE IMPLEMENTATION PLAN
FOR
OZONE
(8-HOUR NAAQS)

ATTAINMENT DEMONSTRATION
FOR
NEW YORK METRO AREA

APPENDIX H

FINAL PROPOSED REVISION FEBRUARY 2008

New York State Department of Environmental Conservation
ELIOT SPITZER, GOVERNOR ***ALEXANDER GRANNIS, COMMISSIONER***

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NOx SUBSTITUTION GUIDANCE

December, 1993

Office of Air Quality Planning and Standards
U.S. Environmental Protection Agency
Research Triangle Park, North Carolina 27711

Section 1: Background

Title I of the Clean Air Act Amendments (CAAA) mandates a 15% reduction of volatile organic compound (VOC) emissions from the 1990 base inventory by November, 1996 in all ozone nonattainment areas classified moderate and above. Areas classified serious and above must achieve the 3% per year VOC reductions past November, 1996 as part of the reasonable further progress (RFP) provisions (§ 182 [c][2][B]). However, Section 182 (c)(2)(C) allows the post-1996 RFP plan to accommodate a less than 3% per year VOC reduction if it can be demonstrated that substitution of NOx emission reductions (for VOC reductions) yields equivalent ozone reductions. Underlying this substitution provision is the recognition that NOx controls may effectively reduce ozone in many areas, and that the design of strategies is more efficient when the characteristic properties responsible for ozone formation and control are evaluated for each area.

The purpose of this document is to provide a procedure that can be applied to meet the post-1996 Section 182(c)(2)(B) RFP requirement as well as the Section 182 (c)(2)(C) equivalency demonstration requirements. The intent of this guidance is to facilitate implementation of the most effective ozone precursor control strategies, while meeting the intent of the CAA RFP provisions.

The guidance consists of two basic steps that are established in Sections 2 and 3 of this document. First, an equivalency demonstration requires that cumulative RFP emission reductions must be consistent with the NOx and VOC emission reductions determined in the ozone attainment modeling demonstration. Second, specified reductions in NOx and VOC emissions should be accomplished in the interim period between 1996 and the attainment date, consistent with the continuous RFP emission reduction requirement. Section 4 provides the legal rationale underlying this guidance and the guidance is summarized in Section 5.

Section 2: Test for Equivalency - Use of Strategies Aimed at the Mandated Attainment Year

[The condition for demonstrating equivalency is that State-proposed emission control strategies must be consistent with emission reductions required to demonstrate attainment of the ozone NAAQS for the designated year of attainment.]

The provision for NOx substitution recognizes that a VOC-only control pathway may not be the most effective approach for effecting attainment in all areas. Consequently, NOx reductions are placed on a near equal footing with VOC through substitution. This document establishes two conditions pursuant to both the substitution and RFP provisions in the Act. The first condition requires that control strategies incorporating NOx emission reduction measures must demonstrate that the ozone NAAQS will be attained within time periods mandated by the Act. This condition reflects the Title I provision for gridded photochemical model demonstrations (Section 182(c)).

The second condition, addressed below in Section 3, maintains the requirement for periodic emission reductions in order to realize progress toward attainment. Flexibility is introduced by allowing VOC and NOx reductions rather than VOC reductions alone. A third condition exists in which the periodic emission reductions must be consistent with the model attainment demonstration.

The basis for equivalency is the ability of a given control strategy (i.e., any particular mix of NOx and VOC emission reductions) to effect attainment of the ozone NAAQS by the designated attainment year. Section 182(c) of the CAA requires that State implementation plans (SIPs) for serious and above nonattainment areas include a demonstration of attainment of the ozone National Ambient Air Quality Ambient Standard (NAAQS) with gridded photochemical modeling. These SIP revisions are due by November 15, 1994 and provide the framework for demonstrating equivalent ozone reductions through the substitution of NOx emission reductions for VOCs. Model application procedures for demonstrating attainment are provided in EPA's Guideline for Regulatory Application of the Urban Airshed Model, (EPA-450/4-91-013).

This modeling requirement already exists as a Title I provision for areas classified serious and above. Due to the flexibility described below in Section 3.0 which permits virtually any set of NOx and VOC RFP reductions in years prior to the attainment date, a linkage to the attainment year control strategy is required. This linkage provides assurance that the

RFP reductions are consistent with the SIP attainment demonstration. States are required to justify substitution by illustrating "consistency" between the cumulative emission changes emerging from the RFP/substitution proposal and the emission reductions in the model attainment demonstration (or comparable modeling analysis). The EPA will approve substitution proposals on a case-by-case basis. Generally speaking, any reasonable substitution proposal will be approved. Linkage to the modeling demonstration provides a screen to remove unrealistic (and inefficient) substitution proposals.

Section 3: Reasonable Further Progress (RFP) Requirements

[The condition for meeting the RFP emissions reduction provision is that the sum of all creditable VOC and NOx emission reductions must equal 3% per year averaged every three years.]

The RFP provisions require periodic emissions reductions until attainment is reached. In the absence of the NOx substitution provision, an area classified serious or above would be required to reduce VOC emissions after 1996 an average of 3% per year every three year period until attainment. This guidance maintains the 3% per year emissions reduction requirement. However, no specified set of VOC or NOx controls is mandated. Reasons for not requiring specific "exchange" rates among VOC and NOx emissions include:

1. The strong likelihood that optimum "exchange" rates vary from year to year and across a geographic area as an area's emissions distribution and atmospheric chemistry change over time;

2. Uncertainty in modeling analyses, particularly when attempting to ascertain responses from small percentage perturbations in emissions; and

3. Resource limitations associated with modeling specific control measures during interim years before attainment dates.

Any combination of VOC and NOx emission reductions which totals 3% per year, and meet other SIP consistency requirements described in this document are allowed. These requirements ensure that the cumulative RFP reductions are consistent with the emission reduction measures identified in the model attainment demonstration. A percentage basis rather than a mass basis is used for calculating the RFP emission reductions. A percentage basis is applied to avoid "absurd" calculations. For example, substitution of NOx reductions for VOC on a ton for ton basis could yield calculated NOx reduction requirements which exceed the available NOx inventory in cases where the base VOC inventory greatly exceeds the NOx inventory. To illustrate, a 50% VOC reduction is analogous to a 100% NOx reduction assuming the VOC inventory is twice the NOx inventory and substitution is based on mass rather than percentage equivalency. The percentage basis also is consistent with the RFP "percent" reduction requirement, therefore buoying the legal justification underlying this guidance.

The calculation to determine yearly VOC and NOx emission reduction totals must be based on typical summer day inventories (same basis used for RFP and modeling inventories). Specific details regarding calculation procedures and emission inventory definitions are found in separate documents, including EPA's forthcoming Guidance on the Post-1996 Rate-of-Progress Plan and the Attainment Demonstration. The following equation generally describes the method to calculate the total 3% per year emission reductions:

$$R_V/VOCBASE + R_N/NOxBASE >= 0.03$$

where; R_V = typical summer day VOC reductions in mass units

R_N = typical summer day NOx reductions in mass units

VOCBASE = the mass of anthropogenic VOC emissions in the 1990 adjusted base inventory, and

NOxBASE = the mass of anthropogenic NOx emissions in the 1990 adjusted base inventory

[note, the cumulative mass reductions are not constrained to 3% per year so that RFP reductions greater than 3% per year are not discouraged.]

The values of R_V and R_N include only the creditable emission reductions from the nonattainment area of concern. For instance, VOC or NOx reductions from the pre-enactment Federal Motor Vehicle Control Program (FMVCP), which are not creditable toward the 3% per year requirement are not included. Potential "creditable" NOx emission reductions which are available for substitution purposes are described in EPA's forthcoming Guidance on the Post-1996 Rate-of-Progress Plan and the Attainment Demonstration.

The attainment strategy requirements must be met in addition to the RFP condition. Total emission reductions are determined by the attainment demonstration, implying that reductions averaging greater than 3% per year averaged from 1996 to the specified attainment year are required if shown to be necessary by the model demonstration. The 3% per year RFP requirement is thus a minimum requirement. Further, the NOx emission reductions credited toward RFP may be capped by the cumulative reductions dictated by the model demonstration. For example, an approved control strategy emerging from a model demonstration for a serious area might show reductions of 6% NOx and 80% VOC, relative to 1990 emissions, are needed by 1999. Assuming zero

creditable NOx emission reductions from 1990 through 1996, NOx reductions averaging 2% per year over the 3 years from 1996 to 1999 represent a cap on the NOx RFP reductions. The reason for linking the RFP reductions to the attainment strategy is to avoid RFP reductions which are not consistent with the model demonstration. Note that the sum of emissions totalling 3% per year are required to meet the basic RFP provisions -- they are not capped by the attainment demonstration. Thus, cases might exist where VOC reductions from the RFP provisions might exceed the cumulative VOC emission reductions in the attainment strategy. Such cases do not conflict with the attainment demonstration since additional VOC reductions will not increase peak ozone. On the other hand, the NOx cap is necessary because NOx reductions have the potential for increasing peak ozone.

Section 4: Discussion of Equivalency

[The following discussion provides the legal rationale underlying the interpretation of "equivalency" and the linkage between the RFP and NOx substitution provisions within the Act.]

"Equivalency" is not defined strictly in the context of, "What specified level of NOx reductions, compared to VOC, results in equivalent ozone reduction?" Instead, any combination of VOC and NOx reductions is "equivalent" so long as the reductions are consistent with those identified as necessary to attain the NAAQS in the modeling demonstration and provide for steady progress in leading to the emission reductions identified as necessary to attain the NAAQS by the specified attainment year.

In allowing a combination of NOx and VOC controls or the substitution of NOx emissions reductions for VOC emissions reductions, Section 182(c)(2)(C) of the statute states that the resulting reductions "in ozone concentrations" must be "at least equivalent" to that which would result from the 3% VOC reductions required as a demonstration of reasonable further progress (RFP) under Section 182(c)(2)(B). This provision could be interpreted to mean that the amount of NOx reductions appropriate for substitution purposes is an amount which, when compared to predicted VOC reductions, results in the same reductions in ozone concentrations that the VOC reductions would achieve in that area. However, such an interpretation could result in a demonstration showing that very small NOx reductions provide an adequate substitute for large VOC reductions. This is because under some conditions substantial VOC reductions produce only small - even insignificant - reductions in ozone concentrations, while minimal NOx reductions under the same conditions may produce the same degree of ozone reductions. EPA believes Congress would not have intended States to meet the Act's progress requirements with emissions reductions that would produce only minimal improvement in ozone concentrations.

The second sentence of Section 182(c)(2)(C) requires EPA to issue guidance "concerning the conditions under which NOx control may be substituted for [or combined with] VOC control." In particular, the Agency is authorized to address in the guidance the appropriate amounts of VOC control and NOx control needed, in combination, "in order to maximize the reduction in ozone air pollution." Further, the Act explicitly provides that the guidance may permit RFP demonstrations which allow a lower percentage of VOC emission reductions. The implicit assumption under that language is that such lesser levels of VOC reductions would be allowed only because of the correspondingly higher

percentage of NOx emission reductions to be authorized as a full or partial substitution for the otherwise required VOC reductions. In light of the entire set of language and Congress's evident intent under this subsection to maximize the opportunity for ozone reductions, EPA believes that Section 182(c)(2)(C) confers on the Agency the discretion to select, for purposes of determining equivalent reductions, a percentage of NOx emission reductions which is reasonably calculated to achieve both the ozone reduction and attainment progress goals intended by Congress. Nothing in the Act or in the legislative history directly addresses the case where NOx reductions that are substituted for VOC reductions, and which meet the plain grammatical meaning of "equivalency," nonetheless result in insignificant ozone reductions. To avoid such a result and give meaningful effect to what Congress likely intended regarding the substitution provision, EPA has decided to rely in its NOx-substitution guidance on the only point of reference provided by Congress concerning what may constitute an appropriate quantitative reduction target for RFP purposes, namely the 3 percent per year required under Section 182(c)(2)(B). Under that approach, EPA would approve substitutions of NOx for VOC that would ensure that the sum of the respective creditable percent reductions of each of these pollutants areawide, averaged over 3 years, would be no less than 3 percent from the baseline.

As additional evidence that Congress was concerned with getting more than minimal reductions in ozone concentrations through substitution, EPA notes that the RFP demonstration described in Section 182(c)(2)(B) focuses on reductions of a specified quantity of VOC emissions per year. (Similarly, the 15 percent RFP reductions required for Moderate ozone nonattainment areas focuses on reductions of that specific quantity of VOC emissions per year.) By contrast, the alternative RFP demonstration in Section 182(c)(2)(C) allows flexible VOC/NOx emission reduction strategies, but only so long as the overall quantitative reduction in ozone concentrations is equivalent to the amount which, for Serious ozone nonattainment areas, Congress initially determined must be met (i.e., the ozone concentrations achieved by VOC reductions of 3 percent per year) in order to ensure expeditious progress towards attainment. In this regard the House Committee Report states: "NOx reductions may not be substituted for VOC reductions in a manner that delays attainment of the ozone standard or that results in lesser annual reductions in ozone concentration than provided for in the attainment demonstration." H.R. Resp NO. 490, 101st Cong., 2d Sess. 239 (1990).

Section 5: Summary

The RFP requirements under Section 182(c)(2)(B) of the CAA are intended to insure that the SIP "provide for such specific annual reductions in emissions of VOC and NOx as necessary to attain the NAAQS for ozone by the applicable attainment date." This language is interpreted to mean that, to meet the RFP requirement, it is necessary to show that steady progress is being made toward implementing measures called for in an area's attainment strategy. Further, the Act also specifies minimal annual percentage reductions in creditable emissions which must be realized in an RFP program. Section 182(c)(2)(C) increases the flexibility in which the annual emission reductions can be derived by allowing NOx emission reductions substitution for VOC after 1996. The recommended procedure responds to these concerns by imposing two requirements.

1. Establish a strategy incorporating reductions in VOC and/or NOx sufficient to meet the NAAQS within timeframes specified by the Act. This is to be done using approved photochemical grid models in a manner consistent with published Agency guidance on the use of such models in attainment demonstrations. In the context of the NOx substitution guidance, the purpose of this first step is to establish an ultimate target toward which the RFP program is aimed.

2. For interim years, any mix of annual reductions in VOC and NOx is permissible so long as it reflects

   (a) a logical step toward implementing the attainment strategy identified in (1), and

   (b) results in a combined annual VOC and NOx reduction of 3% per year.

The requirement for continuous VOC emission reductions amounting to 3% per year has been modified to allow flexibility in the mix of VOC and NOx emission reductions, while maintaining a 3% per year reduction in the <u>sum</u> of NOx and VOC emissions. A principal assumption underlying this guidance is that optimum control strategy designs may differ among various nonattainment areas.

The NOx substitution provision permits greater flexibility for States in designing effective emissions control strategies. Furthermore, because the test for equivalency is identical to the NAAQS attainment test for serious and above areas, the demonstration imposes negligible additional resource burdens for

those areas already required to perform gridded photochemical modeling.

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