



GHG Tailoring Rule

Step I

January 2, 2011 to June 30, 2011

No GHG Trigger

- New and modified large facilities that already have CAA permit requirements for other pollutants – PSD and Title V
- Include GHG review if there is an increase of 75,000 TPY or more of CO₂e – apply BACT
- No sources will be subject to GHG review solely because of CO₂e emissions

Step 2

July 1, 2011 to June 30, 2013

GHG Trigger

- New facilities with CO₂e emissions of 100,000 TPY or more - apply BACT
- Modifications to existing facilities that increase CO₂e emissions by 75,000 TPY or more - apply BACT
- Existing facilities with CO₂e emissions of 100,000 TPY or more – address CO₂e in Title V permits

Step 3

Begin 2011/Conclude by July 1, 2012

- EPA rulemaking – may:
 - Add a step for GHG permitting
 - Permanently exclude certain small sources
 - Streamline future GHG permitting
- Will not require GHG permitting for sources with CO₂e emissions below 50,000 TPY
- Will not require GHG permitting for small sources until at least April 30, 2016

Implementation in CT

- Rule requires states to inform EPA whether rule changes are needed and when they will be adopted
- Regulatory analysis
 - CT does not automatically incorporate EPA rules
 - Definitions
 - Applicability
 - BACT threshold
- Add 100,000 TPY CO₂e cap to GPLPE
 - Requirements effective July 1, 2011
 - Requirements apply only to those with potential emissions greater than 100,000 TPY CO₂e

Information

- GHG Tailoring Rule Federal Register Notice Final Rule

<http://edocket.access.gpo.gov/2010/pdf/2010-11974.pdf>

- EPA Fact Sheet

<http://www.epa.gov/nsr/documents/20100413fs.pdf>



Recently Proposed Federal Rules and Comment Deadlines

Recently Proposed Federal Rules and Comment Deadlines

- June 4, 2010, Proposed Rule, NESHAP for Area Sources: Industrial, Commercial, and Institutional Boilers, 31895-31935
<http://edocket.access.gpo.gov/2010/2010-10832.htm> [Comments due by **August 3**, 2010]
- June 4, 2010, Proposed Rule, NESHAP for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters, 32005-32073
<http://edocket.access.gpo.gov/2010/2010-10827.htm> [Comments due by **August 3**, 2010]
- June 4, 2010, Proposed Rule, Standards of Performance for New Stationary Sources and Emission Guidelines for Existing Sources: Commercial and Industrial Solid Waste Incineration Units, 31938-32004
<http://edocket.access.gpo.gov/2010/2010-10821.htm> [Comments due by **August 3**, 2010]
- June 4, 2010, Proposed Rule, Identification of Non-Hazardous Secondary Materials That Are Solid Waste, 31844-31893
<http://edocket.access.gpo.gov/2010/2010-10837.htm> [Comments due by **August 3**, 2010]
- May 14, 2010, Proposed Rule Amendments, Standards of Performance for New Stationary Sources and Emissions Guidelines for Existing Sources: Hospital/Medical/Infectious Waste Incinerators, 27249-27255
<http://www.gpo.gov/fdsys/pkg/FR-2010-05-14/html/2010-11585.htm> [This action proposes to amend the new source performance standards in order to correct inadvertent drafting errors in the emissions limits for nitrogen oxides and sulfur dioxide promulgated for large hospital/medical/infectious waste incinerators, which did not correspond to our description of our standard-setting process. This action will also correct erroneous cross-references in the reporting and recordkeeping requirements. Comments must be received on or before **June 28**, 2010.]



Ozone Transport Commission (OTC) Formal Actions

June 3, 2010 Ozone Transport Commission (OTC) Formal Actions

- At annual OTC meeting, OTC states voted on:
 - **Statement** on 2010 ozone National Ambient Air Quality Standards (NAAQS)
 - **Resolution** calling on Environmental Protection Agency to adopt and implement additional national rules to reduce ozone transport and protect public health
 - **Resolution** concerning continued development, coordination and implementation of additional regional ozone control strategies for certain source categories
 - **Memorandum of Understanding** among the states of the OTC on adoption of new regional control measures toward achieving the ozone NAAQS
- Link to OTC web page with June meeting information
<http://otcair.org/document.asp?fview=meeting>