



State Plan Elements and Timeline

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111(d) State Plan

- Roadmap to achievement of state emissions performance goal (834 lbs CO₂/MWh*)
- 11 required elements
- Composed by Georgia EPD > public comment > submit to EPA
- Interim emissions performance period 2020 – 2029*
- Final compliance 2030*

* Per proposed rule



Clean Air Act

Section 111: Stds of Performance for New Stationary Sources

- Applies to specific stationary industrial point source type (EGU, waste incinerator, lead smelter, etc.)
- Rules codified: 40 CFR 60
- Limit emissions of a NAAQS pollutant, an air toxic, or both
- Prevent new pollution, level compliance playing field for industry across geographical regions with varying air quality
- Limits based on “best system of emissions reduction” per EPA

Section 111(b) – New Sources

- Limits emissions from newly constructed units (built after date xx/yy/zz)



Clean Air Act

Section 111: Stds of Performance for New Stationary Sources

Section 111(d) – Existing Sources

- Limits emissions from existing units (built on/before xx/yy/zz)
- No 111(b) rule → No 111(d) rule
- EPA issues “emissions guidelines” rule
- Emissions guidelines not directly enforceable
- State plan implements/enforces emissions guidelines
- No state plan → EPA issues federal plan (40CFR62__) that EPA or state can enforce



Timeline

(as of today)

Proposed rule: June 18
Comments due: Dec. 1

Final rule – 111(b) and 111(d)
Proposed rule – fed plan 111(d)

State plan due: June 30
Final rule – federal plan

State plan – 1 yr ext: June 30

Multistate plan – 2 yr ext: June 30

2020 – 2029
interim perf
period →→

2014	2015	2016	2017	2018	2019
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State Plan Elements

rule 60.5740 (a)(1 – 11)

- Inventory of EGUs, emissions, other entities
- **PLAN APPROACH !!!**
(plan backbone)
- Emission performance level
(goal = 834 lbs/MWh ?)
- Projection of emission performance
(projected < goal)
- Emission standards
- Demonstration that stds are quantifiable, etc
- Milestones and corrective measures
- Monitoring, reporting, recordkeeping
- Annual state reporting
- Public hearing
- Supporting material



Plan Element	Comment/description
Identification of affected entities, including an inventory of CO2 emissions from affected EGUs	<ul style="list-style-type: none">• Inventory Year = 2014 or 2015
Description of plan approach and geographic scope	<ul style="list-style-type: none">• Approach: rate-based or mass-based• Enforceable obligations: coal-fired EGUs only? RE generation? Demand-side EE programs? Nuclear generation?• Geographic scope: single state or multi-state
State emission performance level to be achieved through plan	<p>Plan compliance metric</p> <ul style="list-style-type: none">• Rate: 834 lbs CO2/MWh (proposed)• Or Mass: 35 - 55 million (????) tons CO₂



Plan Element	Comment/description
Demonstration that plan is projected to achieve each of the state's emission performance levels for affected entities	<ul style="list-style-type: none">Modeling or other quantitative analysis demonstrates that projected emissions performance will meet interim and final goals
Identification of emission standards "for each affected entity" [or group of affected entities?]	<p>Emissions standard</p> <ul style="list-style-type: none"><u>Affected EGU</u>: emissions rate, utilization, mass emitted, etc.<u>Other affected entities</u>: requirement that reduces utilization (and therefore emissions) of affected EGU(s)
Demonstration that each emission standard is quantifiable, non-duplicative, permanent, verifiable, and enforceable	<ul style="list-style-type: none">Non-duplicative – e. g., two state plans cannot take credit for power generated by same wind farm in Texas



Plan Element	Comment/description
Program implementation milestones and corrective measures	<ul style="list-style-type: none">• Milestones: start of EE program, retirement of EGU, etc.• Corrective measures: implemented if measured emissions performance exceeds projected by 10% or more
Applicable monitoring, reporting, and recordkeeping requirements for each affected entity	<ul style="list-style-type: none">• Historical experience with EGUs• First time for EE and RE
Description of the process, contents, and schedule for annual state reporting to the EPA about plan implementation and progress	<p>Annual Report</p> <ul style="list-style-type: none">• Emissions performance of all affected entities• List of affected entities and their compliance status• Emissions performance of all affected EGUs• List of affected EGUs and their compliance status

Summary – State Plan Elements and Timeline



- State plan due June 2016
- “Plan Approach” element will be backbone of plan
- Coordination across state agencies and organizations
- What changes will final rule bring (summer 2015)?