

Regulating Stationary Source GHG Emissions under the CAA: ANPRM

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OAQPS

Key Questions

- NAAQS
 - 1 Group of GHGs or individually
 - Adequacy of science for standard-setting
 - Implications of nationwide attainment or nonattainment
 - Traditional SIP v. Regional Haze approach
- 112- MACT
 - Appropriateness to GHGs
 - Flexibility to address fewer than all emission sources
- 129 Solid Waste Combustors
 - Appropriateness to GHGs
 - Categories to consider and how to establish controls

Key Questions, cont'd

- NSPS
 - Factors affecting what sources to regulate
 - Emissions, GHG potency, availability of information, whether regulating would produce reductions
 - Traditional source categories, sectors, or “Supercategories”
 - Flexibility to consider trading and alternative implementation approaches
 - plant-wide, efficiency standards, work practices, market-oriented
 - Ability to base standards on projected future technologies
 - 111(d) plans for existing sources
- PSD
 - Flexibility to establish different major source thresholds and significance levels
 - Administrative permitting burdens and ways to streamline
 - BACT determinations and presumptive BACT
- Title V
 - Administrative permitting burdens and ways to streamline (including higher applicability cut-offs)
 - Fee structure and inclusion of GHGs in fee calculations