

GHG Update

CIBO Meeting 9 2013

Climate Change Policy

- PSD review of GHG emissions; BACT and Synthetic Minor experience to date
- NSPS for fossil fuel fired electric generating units
- President's June 24, 2013 Georgetown Climate Change Policy address & push for NSPS on existing units

Trends & Experience in GHG BACT

- GHG BACT determinations getting tougher
 - Carefully define scope of project
 - Include why CCS is not OK in step 1, 2, & 4
- EPA scrutiny varies based on project
- Vacated Biomass Deferral on projects – CIBO experience???

<http://www.mecseminars.com/environmental/23rd-annual-environmental-permitting-ohio-conference-0>

MEC Conference OH (Columbus) Workshop F

Regulatory/Legal Developments: Recent Milestones in U.S. Climate Change Law and Policy

- **January 2012:** D.C. Circuit upholds the Tailoring Rule, and leaves intact the Tailpipe, Triggering, and Tailoring Rules
- **April 2012:** EPA proposes GHG NSPS for fossil fuel fired EGUs
- **January 2013:** California's Economy-wide GHG cap-and-trade program begins
- **February 2013:** In his State of the Union address, President Obama promises Executive Branch action to curtail GHG emissions in the absence of Congressional action
- **June 2013:** The President's Climate Action Plan is announced

NSPS Developments & Plans

New EGU GHG NSPS limits

- Sept 20, 2013 – Release of revised proposed GHG NSPS limits
 - Recall that EPA limit of 1000 lb CO₂/MW-hr
 - Best utilities achieve 1900 lb CO₂e/MW-hr
- Final rule before mid-term elections??

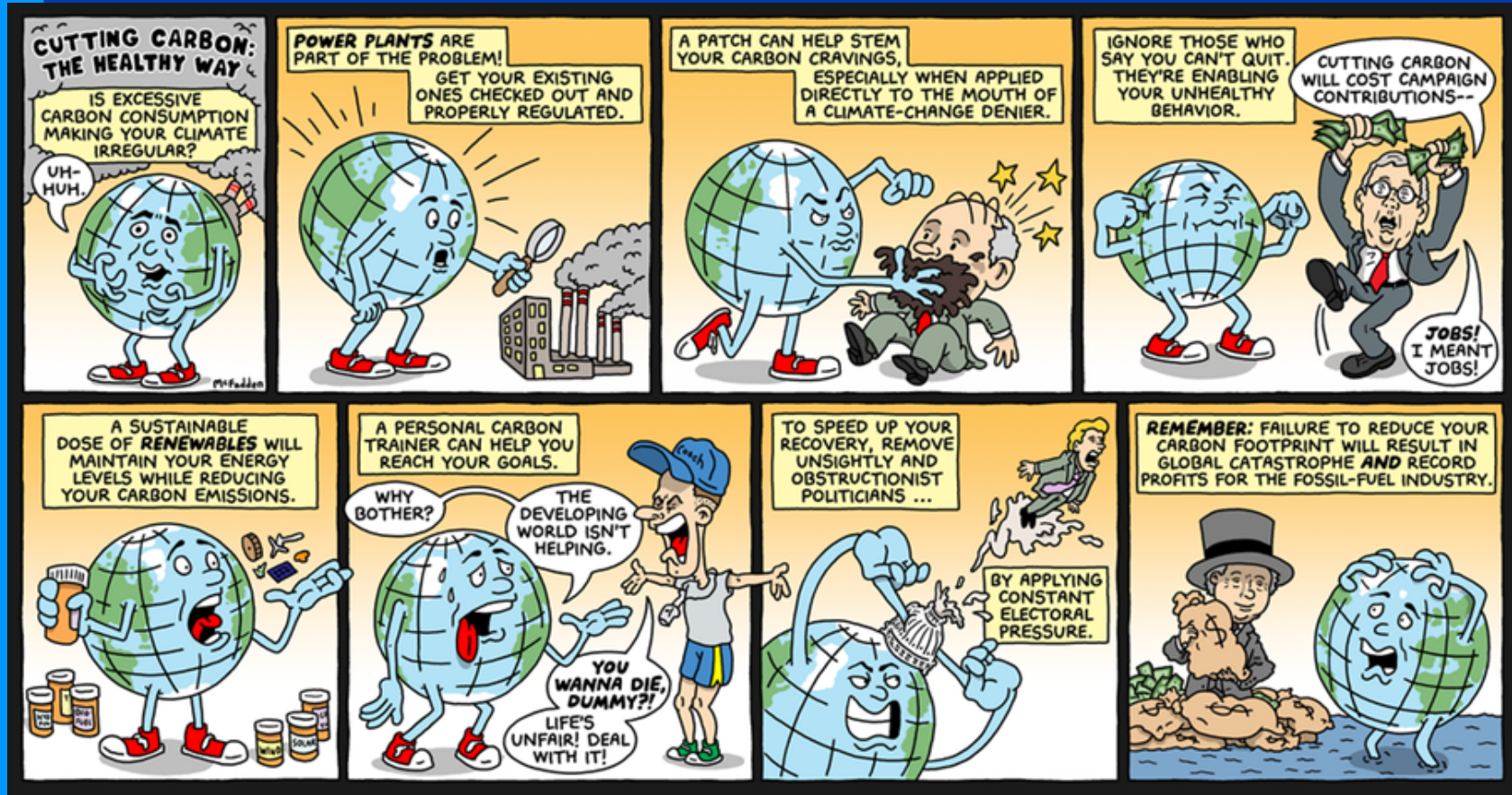
EXISTING UNITS

- Proposed NSPS 6 2014
- Final NSPS 6 2015
- SIPs due 6 2016

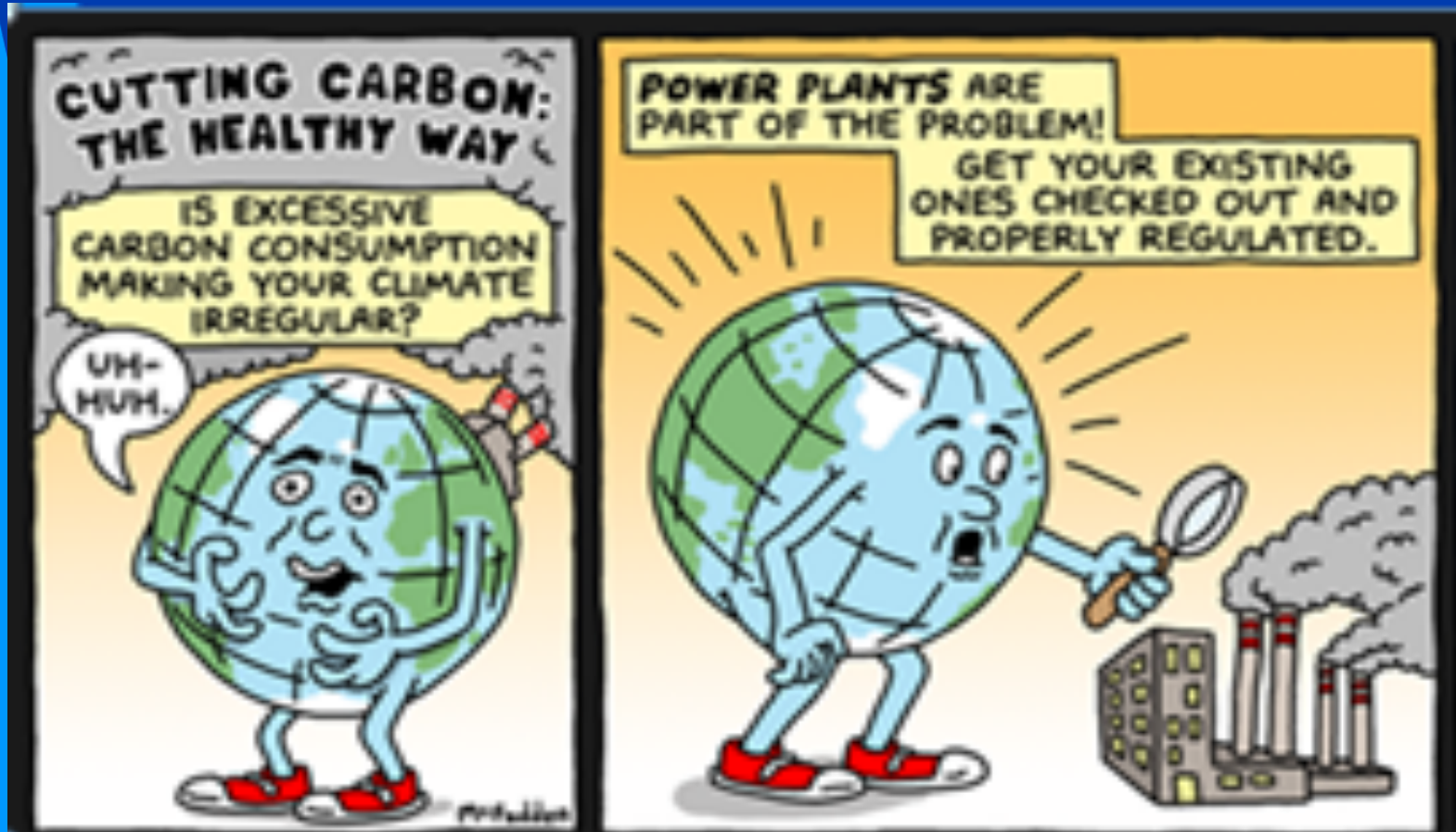
Social Cost of Carbon (SCC) Policy

- Washington Legal Foundation Petition with DOE over microwave rule asking for formal notice and comment on SCC
 - DOE taking comment on whether to do that
 - Trades supporting petition – CIBO??
- API and NAM Petition to EPA to withdraw SCC guidance until it has gone through a formal review process

Are we having fun yet???



McFadden, Brian "The Strip". Cartoon. *The New York Times*, 30 June 2013



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A PATCH CAN HELP STEM
YOUR CARBON CRAVINGS,

ESPECIALLY WHEN APPLIED
DIRECTLY TO THE MOUTH OF
A CLIMATE-CHANGE DENIER.



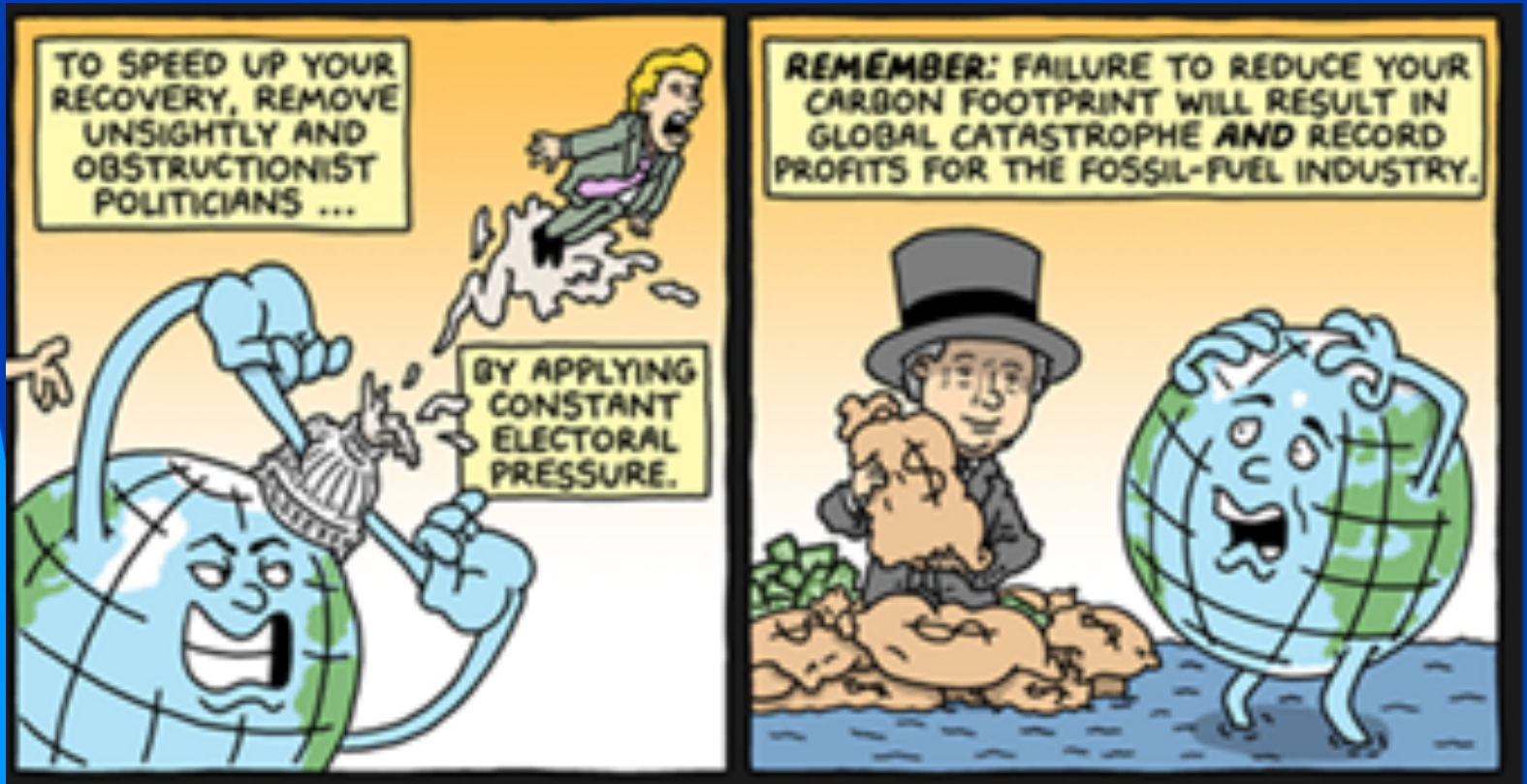
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