



Advancing each generation.



CIBO & Midwest Ozone Group Collaboration

CIBO Annual Meeting – Woodstock VT

2016 October 21

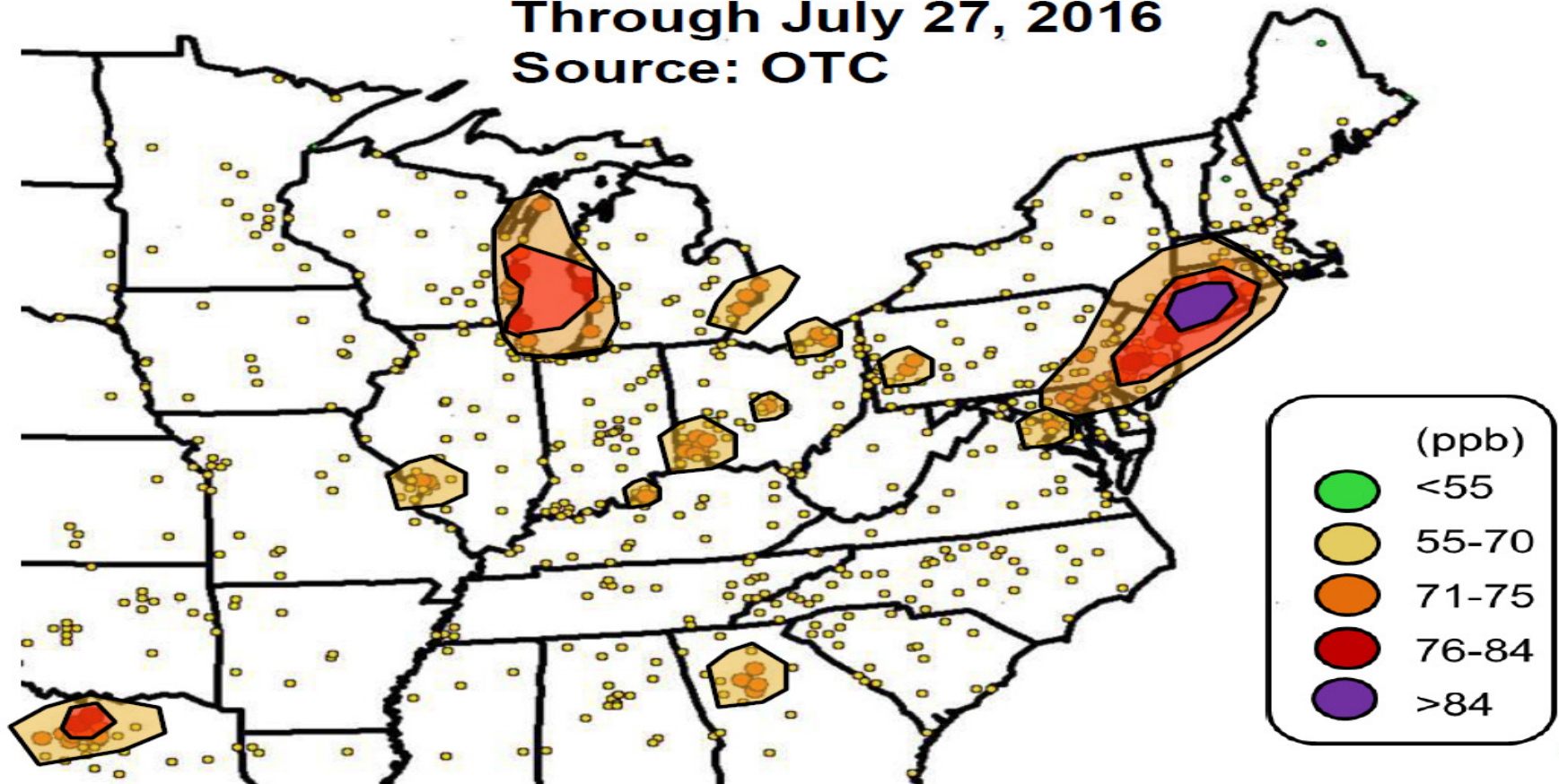
Ozone NAAQS Implementation Milestones

Final NAAQS Date	Designations Effective	Infrastructure SIP Due	Attainment Plans Due	Attainment Date
2015	12/2017	10/2018	Mid 2020-2021	2020-2037

70ppb Ozone NAAQS Design Values

Preliminary 2014-2016 DVs

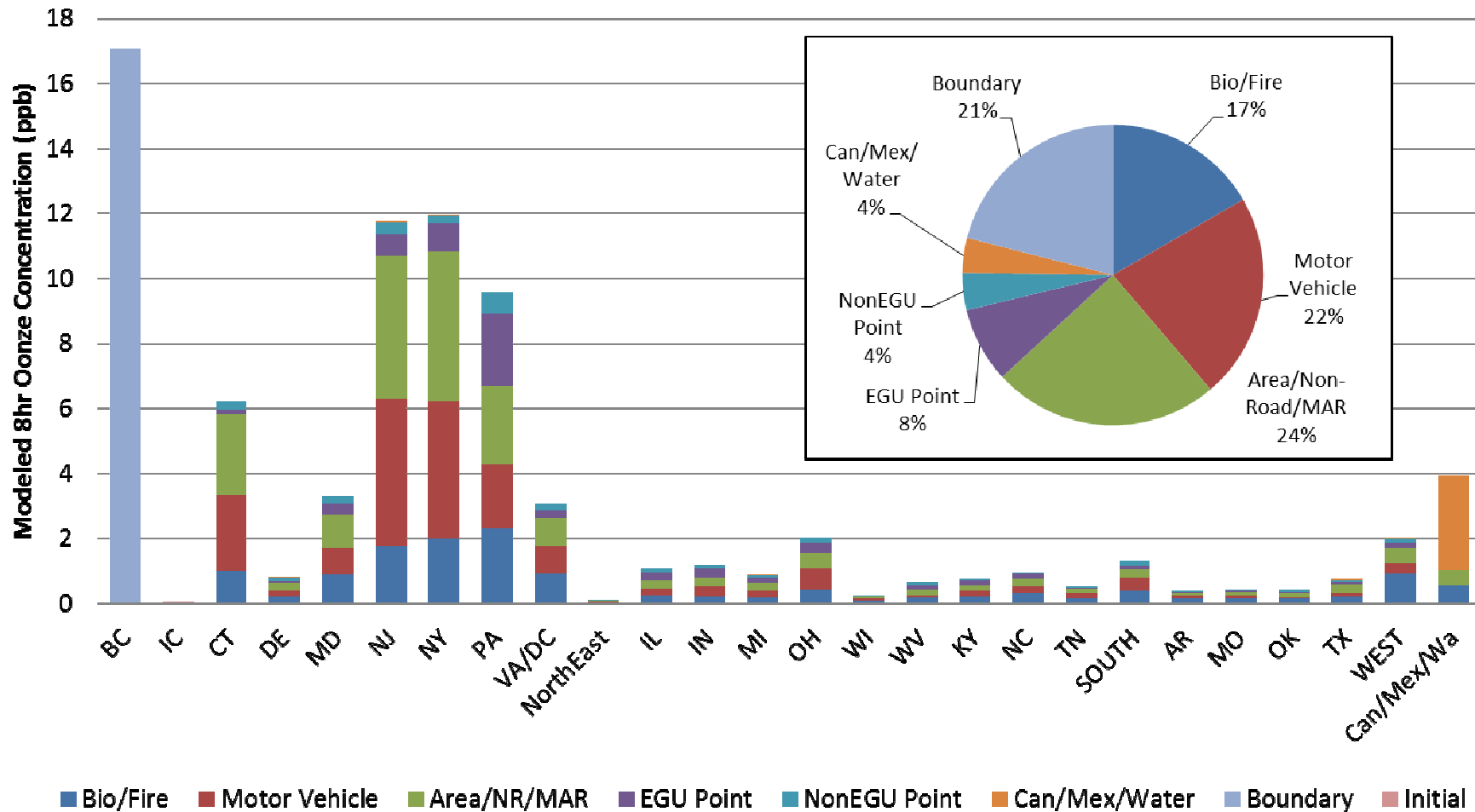
Through July 27, 2016
Source: OTC



Source Contribution Modeling

Fairfield, Connecticut

2017 OSAT Results - 75 ppb Threshold Day Average



CSAPR Version 2

Proposed rule:	December 3, 2015
Comments filed:	February 1, 2016
Meeting with EPA:	June 27, 2016
Meeting with OMB:	August 16, 2016
Final rule:	September 7, 2016

Scope of Rule

- Includes 22 eastern states (FL, NC & SC excluded)
- **Does not include non-EGUs (time limitations)**
- Only addresses EGUs to the extent of operation of existing NOx controls
- Revised ozone season budgets (May 1 – September 30) beginning 2017

Budget Increases

- Overall increase 299,592 to 315,986
- State increases:

BUDGET INCREASES	
Alabama	32%
Arkansas	73 % (2017 only)
Illinois	20%
Iowa	35%
Louisiana	18%
Mississippi	7%
Missouri	3%
New Jersey	2%
New York	15%
Ohio	17%
Pennsylvania	24%
Tennessee	41%
Virginia	35%
West Virginia	33%
Wisconsin	42%

Budget Decreases

Budget Decreases	
Indiana	18%
Kansas	13%
Kentucky	2%
Maryland	5%
Michigan	13%
Oklahoma	28%
Texas	10%

“More from Midwest” Demand NE States!!

176A Petition

- Petition filed December 9 and 10, 2013
- Petitioning states: CT, DE, MD, MA, NH, NY, PA, RI and VT
- Target states: IL, IN, KY, MI, NC, OH, TN, VA and WV
- Object: Seeking to expand OTR

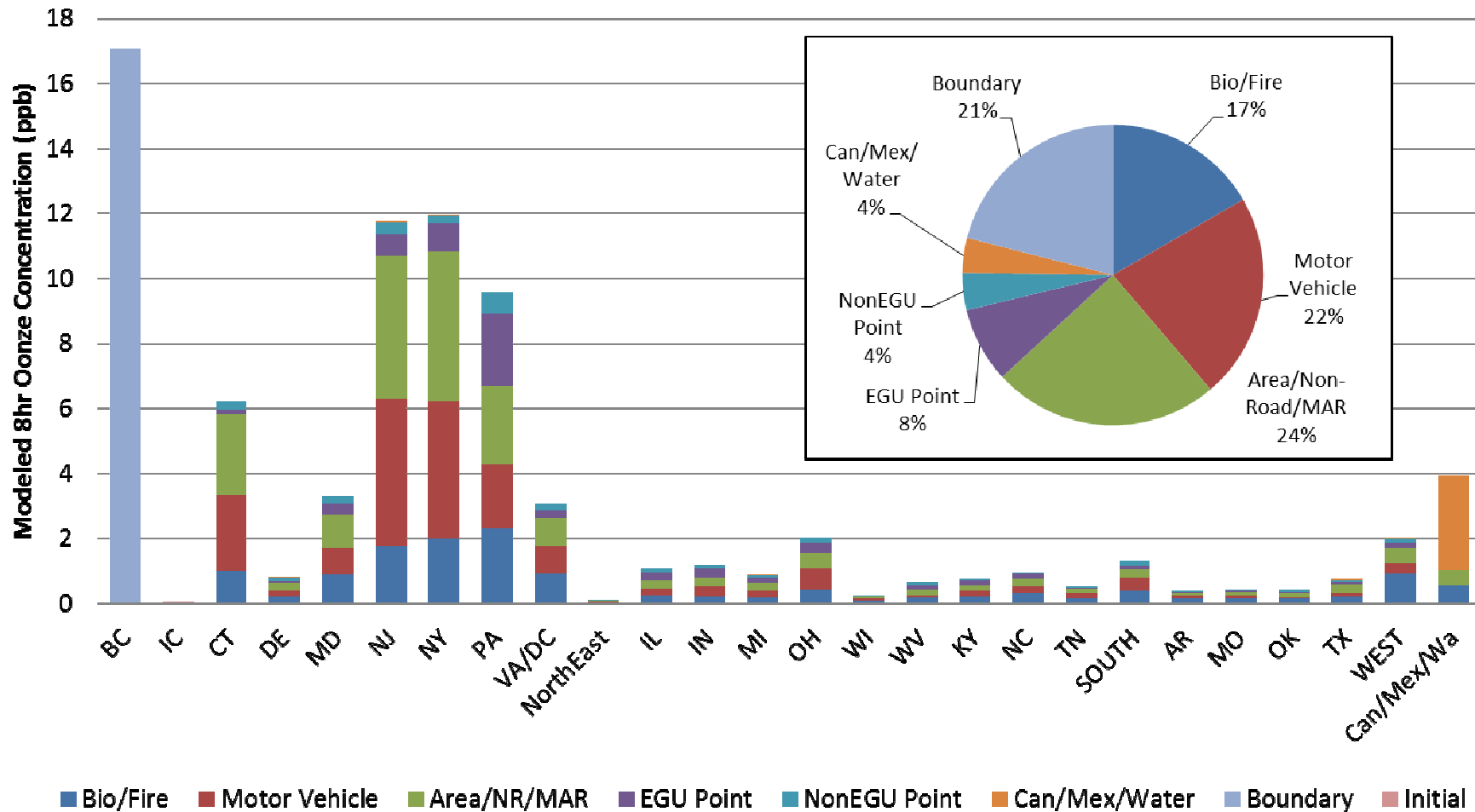
176A NE Litigation

- Pending in US District Court, Southern District of New York
- Plaintiffs: NY, CT, MA, NH, RI and VT
- Seek an order requiring EPA to provide for notice and comment and to approve or disapprove the petition filed December 9 and 10, 2013

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“So What?!?!” You Say.....

- RACT for VOC and NOx for ICI Boilers and other Processes
- Non-Attainment New Source Review
 - Emissions Offsets for New Projects
- OTC Operates by “majority rules”
 - Darnedest thing, the NE States will be the “Majority”

So What's CIBO Doing?

- Collaborating with MOG on modeling and analysis reinforcing:
 - ICI Boilers are not the problem
 - NE States need to clean up their act before looking beyond

Advancing each generation.

