

*The Element of **Possibility***<sup>™</sup>

# MOG Update

**CIBO Energy & Environment Meeting**

March 8, 2017



# 176 Petition Update

# International Contributions

## NE State's 176 Petition



- 2013 NE States Petition EPA to expand OTC
  - IN, KY, WV, VA, OH, MI, TN, NC & IL
- EPA sat upon request until Courts were asked to force them
- Jan. 2017 Obama EPA proposes to DENY
  - Look to “Good Neighbor” SIPs to rectify transport
  - CSAPRv2 addresses “significant” transport
- Public hearing on proposal March 14, 2017
- Comments due April 13, 2017

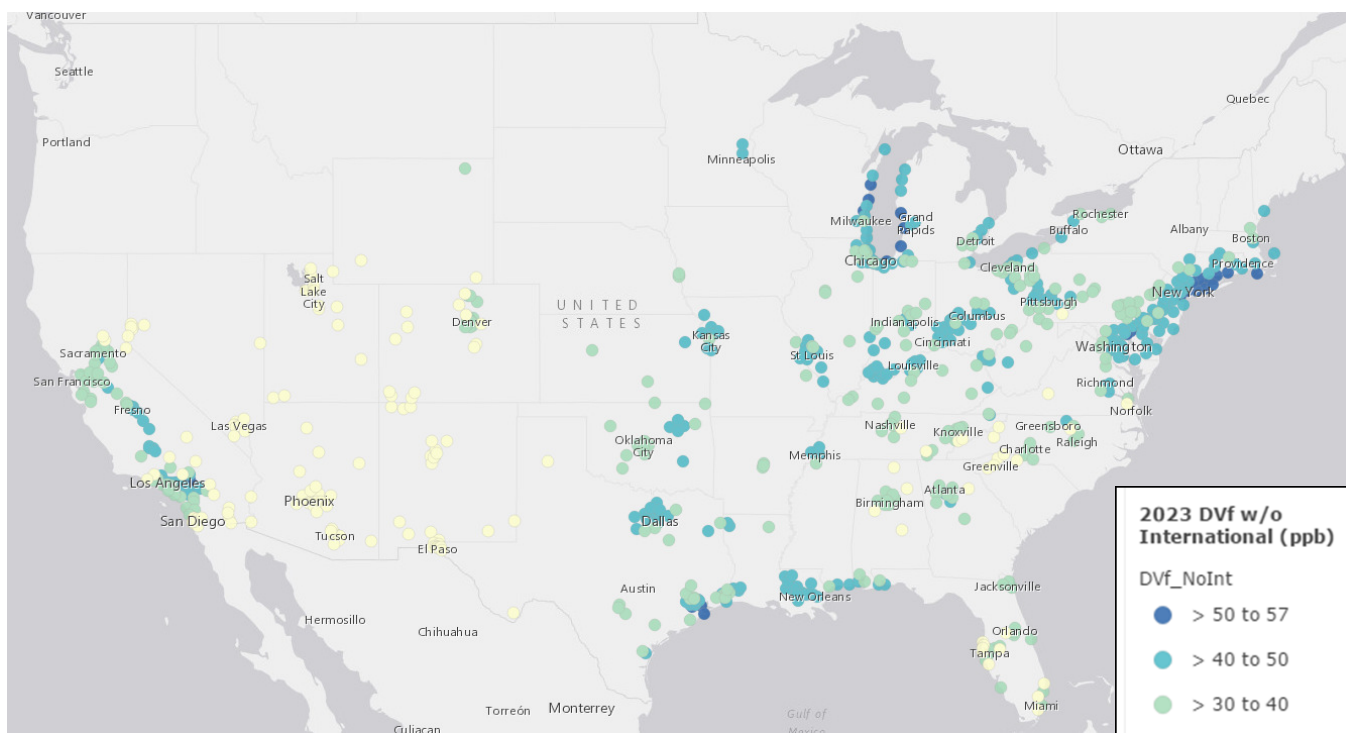
- Deals with “significant transport” from EGU’s to 75ppb Standard
- “Significant Transport” arbitrarily selected as 1%
- MOG and CIBO (?) of Trump Admin ask could be to re-define “Significant Transport” to 2%, 3%, 4%, ???

## Why not Congressional Review Act CSAPRv2

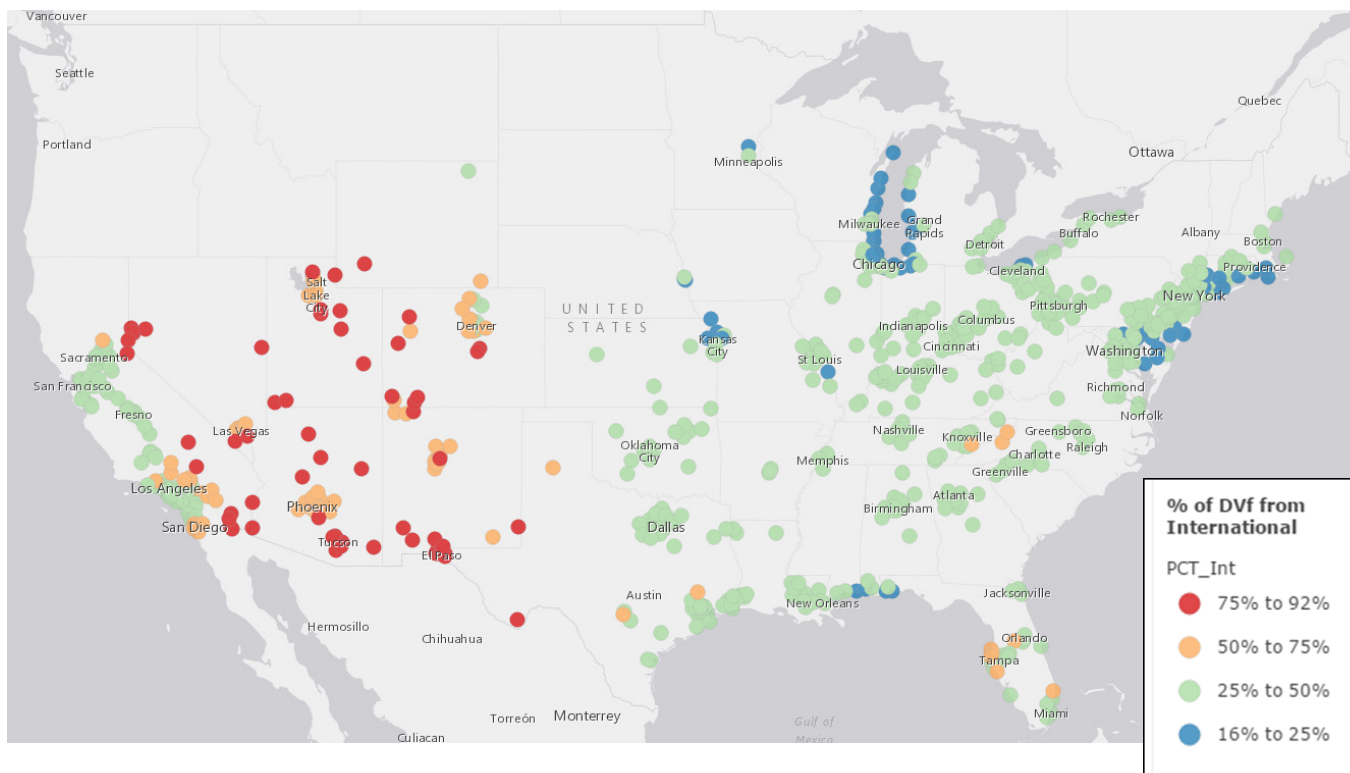


- Concern about CRA's "and don't bring this back ever" provision
  - Would that mean no cap & trade rules again?
- CSAPRv2 stopped 176 and should stop 126 petitions

- Data taken from EPA 2015 Ozone NAAQS NODA APCA modeling (2023 projection)
  - Includes 2011 boundary conditions data
- International emissions for this presentation is the sum of boundary and initial condition, Canadian, and Mexican emission components



No monitor in CONUS with DVf > 57 ppb when international removed





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