



Overview of the Prevention of Significant Deterioration and Title V Greenhouse Gas Tailoring Rule

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Overview



The AFIT of Today is the Air Force of Tomorrow.

- Steps in GHG Permitting
- Rule Implementation
- PSD Greenhouse Gas (GG) requirements
- Title V GG Requirements



Steps in Permitting of GHGs



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- May 2007- Supreme Court Ruling
- December 2009- Endangerment finding on GHGs
- April 2010- GHG Emission standards for Light-duty vehicles
 - 2 Jan 11- Stationary source permitting triggered
- May 2010- GHG Title V/PSD Tailoring Rule
- March 2011 - Guidance to states on GHGs permitting



Rule Implementation



The AFIT of Today is the Air Force of Tomorrow.

- Two-step phase in of requirements for largest emitter of GHGs
 - Facilities responsible for nearly 70% of GHG emissions
- Expand rule to cover large sources of GHG not previously covered by CAA
- Additional EPA steps
 - Looking at smaller sources



PSD Requirements



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- Step 1 (2 Jan 2011- 30 Jun 2011)
 - Only sources that are constructed or modified that have increase or net increase in emissions over thresholds required to address GHG emissions under PSD
 - For GHG increases over 75,000 TPY CO₂e would have Best Available Control Technology (BACT) requirements AND
 - Greater than 0 TPY on a TPY mass basis



PSD Requirements



The AFIT of Today is the Air Force of Tomorrow.

- Step 2 (1 July 2011 – 30 Jun 2013)
 - Builds upon Step 1
 - Three scenarios where PSD applies to GHG emissions
 - Scenario 1:
 - Modification subject to PSD (for other NSR pollutant) and has GHG emissions increase and net emissions increase:
 $\geq 75,000$ TPY CO₂e **AND**
 > 0 TPY mass basis



PSD Requirements



The AFIT of Today is the Air Force of Tomorrow.

- Step 2 (1 July 2011 – 30 Jun 2013)-(con't)
 - Scenario 2 (Both below conditions must apply)
 - Existing source has a PTE $\geq 100,000$ TPY CO₂e **AND** 100/250 TPY mass basis
 - Modification has a GHG emissions increase and net emissions increase $\geq 75,000$ TPY CO₂e **AND** > 0 TPY mass basis



PSD Requirements



The AFIT of Today is the Air Force of Tomorrow.

- Step 2 (1 July 2011 – 30 Jun 2013)-(con't)
 - Scenario 3 (Both below conditions must apply)
 - Source is an existing minor source for PSD
- AND**
- Modification alone has actual or potential emissions $\geq 100,000$ TPY CO₂e **AND** 100/250 TPY mass basis



Title V Requirements



The AFIT of Today is the Air Force of Tomorrow.

- Step 1 (2 Jan 2011 – 30 Jun 2011)
 - Only sources currently subject to a Title V Permit would be subject to Title V Requirements for GHG
 - No sources would be subject to CAA permitting requirements due solely to GHG emissions



Title V Requirements



The AFIT of Today is the Air Force of Tomorrow.

- Step 2 (1 Jul 2011 to 30 Jun 2012)
 - Comply with Step 1
 - Facilities can now require Title V permits for GHG emissions alone
 - Threshold is 100,000 TPY CO₂e **AND**
 - 100 TPY GHG mass basis
- EPA estimates 550 sources will need Title V permits for GHG emissions
 - Majority will be solid waste landfills and industrial manufacturers



Title V Permitting Requirements



The AFIT of Today is the Air Force of Tomorrow.

- Sources that fall under Step 1 or Step 2 must ensure applicable GHG requirements addressed in Title V permit
 - Permits must contain conditions to prove compliance
- EPA anticipates initial applicable requirements will be GHG control requirements resulting from PSD actions



Additional Step- Step 3



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- Commence in 2011 and end NLT 1 Jul 12
- Will discuss whether smaller sources can be permanently excluded from permitting
- EPA will propose viable streamlining options
- Permits not required for smaller sources in Step 3 or other actions until at least 30 Apr 16
- Step 3 (if necessary) will not require permitting for sources < 50,000 TPY



Other Steps



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- End of Apr 2015- EPA to complete study on remaining permit burdens that would exist if Step 3 applied
 - Rule by 30 Apr 2016 to address these facilities
 - Decide if streamlining is needed to phase in more sources or permanent exclusion from permitting
- Step 3 (if necessary) will not require permitting for sources < 50,000 TPY



EPA Technical Tools/Resources



The AFIT of Today is the Air Force of Tomorrow.

- White Papers on:
 - Numerous sources including large commercial/industrial/institutional boilers,
- Control Technology Clearinghouses
 - RACT/BACT/LAER
 - GHG Mitigation Strategies
- GHG Permitting Action Team
- GHG Training for Permitting Authorities, Industry and Other Stakeholders
- One-stop website for GHG permitting resources:

www.epa.gov/nsr/ghgpermitting.html



Summary



The AFIT of Today is the Air Force of Tomorrow.

- PSD/Title V Tailoring Rule – final rule 13 May 2010
 - Rule defines when permits are due under both programs
- Facilities responsible for nearly 70% of national GHG emissions covered under rule
- Requirements became effective 2 Jan 11
 - Implemented in two steps