

# Moving To Multi-pollutant Sector-based Approaches

---

Presentation for the CAAAC Subcommittee on  
Economics and Innovative Policy

Office of Air Quality Planning & Standards  
Sector Policies and Programs Division

Lisa Conner  
Elineth Torres  
Brenda Shine



October 5, 2010



# Overview

- Introduction
  - White Paper “Moving to Multi-pollutant Sector-based Approaches”
- OAQPS Sector Activities
- Transforming Challenges into Opportunities
  - Source Definition
  - Cost Impact Minimization
  - Work Practice Standards
- Discussion
  - Proposed Multi-pollutant Sector Work Group Charter

# Sector Strategy

## Seeing the forest for the trees



Emission points are like the trees.

Sector strategy helps EPA see the forest.



# Moving Forward with Sector Opportunities

## SHORT TERM

- Synchronize timelines
- Multi-pollutant analysis
  - Highlight interaction of emission limits and control technologies
    - One control may have significant co-benefits
  - May help inform tough decisions on individual rules and EPA priorities
- Leverage resources (human and financial) more effectively

## LONG TERM

- Collect better data
- Lower costs
- Deter lawsuits
- Foster innovation
  - Integrate limits on criteria air pollutants, toxic air pollutants
- Provide greater regulatory stability

# OAQPS Sector Activities

- Electric Utilities
- Boilers and Process Heaters
- Cement Manufacturing
- Petroleum Refineries
- Chemical Manufacturing
- Oil and Gas Production and Distribution
- Iron & Steel
- Non-Ferrous Metals
- Waste Incineration
- Metal Foundries
- Formulated Products Manufacturing and Use
- Pulp and Paper

# Transforming Challenges into Opportunities

- **Source Definition**

- How can EPA move from source category or Unit-by-Unit definitions to facility-wide source definition

- **Example: Petroleum Refining**

- The refining sector includes numerous rules each with separate source category definitions that could potentially be combined into two or three categories that would facilitate facility-wide assessments

- **Example: Boilers**

- Due to Court-ordered deadlines, boilers are currently addressed together and regulated as a separated sector under the Boiler MACT and Boiler Area Source Rule
- Moving from unit-by-unit definition, OAQPS expects to be able to consider boilers in the individual multi-pollutant sector approaches

# Transforming Challenges into Opportunities

- **Cost Impact Minimization**

- Are there innovative ways to set and implement multiple sector actions in a manner that minimizes the impact on the industries?
- Can EPA legally set standards that phase in over time to spread costs out?

- **Example: NESHAP & NSPS**

- We can synchronize timelines to set both standards at the same time , reducing burden for reporting, and compliance, and select technologies that achieve reductions for multiple pollutants
- The costs, however, are also incurred simultaneously.

# Transforming Challenges into Opportunities

- **Work Practice Standards**

- How to utilize work practices standards where quantifiable emission limitations and reductions are needed?

- **Example: Petroleum Refineries and Chemicals Sector**

- How to overlay the “fence-line” concept over the existing obligations?
- How can a design, equipment, work practice, or operational standard (DEWOS) provide some measure of quantification of emissions?

# Questions & Discussion

Thank You!