

**NACAA Members' Questions for EPA for
NACAA-EPA Conference Call on CSAPR Implementation
(revised #1)**

**Friday, November 21, 2014
11:30 AM – 12:30 PM
Call-in number: (866) 365-4406
Access Code: 2682624#**

Connecticut

- 1) Please explain what happens when CAIR sunsets and CSAPR begins to address the states no longer in the program (i.e., Connecticut).
- 2) What does EPA have to offer to fill the gap and prevent the state from having to implement a state program to address anti-backsliding provisions?
(CT's emissions are well below the CAIR cap so any backstop will just be an administrative burden with no environmental result.)

Maryland

- 3) Many constituents are asking what's happening with CSAPR and when implementation will start. Can EPA issue a formal announcement that CSAPR will start in 2015?

Missouri

- 4) Will all dates in the CSAPR be pushed back by 3 years (source compliance, SIP submittal deadlines, allocation submittal deadlines, etc.)?
- 5) Is EPA planning a rulemaking to clarify timelines in CSAPR and to clarify that it will be in effect and replacing CAIR in 2015? If so, when is the rulemaking expected to be released, and will there be a comment period?
- 6) Are the Supplements to CSAPR, the February 2012 Technical Revisions Rule and the June 2012 Technical Revisions Rule, still in place? Are all of these adjustments expected to be moved forward by 3 years (e.g. 2016 allowances will be the same as 2013 allowances would have been, and so on)?
- 7) Will the 2015 State budgets remain unchanged despite retirements of units since 2010?
- 8) Will the 2012 CSAPR allowances currently in CAMD accounts be used as the 2015 allowances?
- 9) If the term interfere with maintenance is revised will some states still be in the CSAPR program(s)?
- 10) How long do retired units keep their allowances under the FIP?

Kentucky

- 11) Will CSAPR begin on January 1, 2015, for the CSAPR annual SO₂ and annual NO_x trading programs, and on May 1, 2015, for the CSAPR ozone season NO_x trading program?
- 12) Please confirm that the latest EPA CSAPR SO₂ and NO_x allocations are those at <http://www.epa.gov/crossstaterule/pdfs/CompleteTransportRuleAllocations.xls>
- 13) What tolling of the CSAPR compliance deadlines is EPA going to implement?
- 14) For planned CSAPR implementation, when will and what CSAPR assurance provisions (state variability limits) will apply for state compliance with the CSAPR annual SO₂ and annual NO_x trading programs, and the CSAPR ozone season NO_x trading program?
- 15) How and when does EPA intend to communicate and make available to states and affected units the latest information and details on the pending CSAPR implementation?

New Jersey

- 16) What is the timing for states to submit an abbreviated SIP (i.e., what's the first year for which states can

allocate)?

17) In the "CSAPR June Revisions Rule (77 FR 34830, June 12, 2012)," the variability is listed for only 2014 and later. Is there no variability limit for 2012 and 2013?

18) For CAIR, EPA provided a template for states to use as part of their permitting process that allowed the CAIR provisions to be listed but did not require immediate incorporation into a Title V permit (so states would not have a bunch of Title V reopened just for CAIR). EPA should provide the same process for CSAPR.

19) When will EPA revise CSAPR to address the 75-ppb NAAQS?

20) Will EPA revise or supplement CSAPR with caps on daily emissions to address peak NO_x emissions on high ozone days?

21) With the implementation of CSAPR, what are USEPA's next steps with respect to the 110 Good Neighbor SIPs for 85- and 75-ppb ozone standards?

22) Can states drop out of CSAPR? If yes, what is needed for the demonstration?

Oklahoma

23) Is EPA planning on revisiting the "Better than BART" Regional Haze determination for states participating in any of the CSAPR trading programs?

24) Have the ozone-season NO_x allowances been placed in CAMD accounts for facilities located in the states covered by the supplemental Final Rule (77 FR 34830-34846, published June 12, 2012)? If not, when is that expected to take place?