

New Source Review: What does it do?

William Harnett
EPA Office of Air Quality
Planning and Standards
August 16, 2006



Tale of Two Programs

- Nonattainment New Source Review (NSR)
 - Applies in areas which are designated nonattainment for national ambient air quality standards (NAAQS)
- Prevention of Significant Deterioration (PSD)
 - Applies in areas which attain the national ambient air quality standards



Intent of Congress

- Require best controls on new and modified sources in attainment areas
- Require “best of the best” controls and emission offsets from new and modified sources in nonattainment areas
- Ensure compliance with NAAQS
- Reduce emissions from existing sources ?
- Protect “clean” areas from degrading
- Protect “air quality related values” in Class I areas (national parks and wilderness areas)
- Force control technology improvements



New versus Existing Sources

- New sources
 - About 75% of permits issued are for new greenfield sources or new sources at existing plants
 - Generally achieves technology goals but little else
- Existing sources
 - Modifications account for 25% of the permits issued.
 - Avoidance may cause more reductions than compliance
 - Part of program with the greatest controversy



Actual Effects of NSR/PSD

- Discourages reductions in emissions from existing sources
- Interferes with ability of industry to operate their facilities efficiently
- Fails to account for multimedia impacts
- Does not encourage energy efficiency
- Does not protect “clean” areas from degrading in air quality (minor and mobile sources)
- Does not protect AQRVs in Class I areas (NPS)
- Creates incentives for urban sprawl



Air Pollution Caps

- Can be plantwide or geographic in scope
- Gives certainty on emissions within the scale
- Can include reductions in emissions (Acid Rain, NOx Trading Program, Clean Air Interstate Rule)
- Can include a time schedule that also gives certainty on reductions
- Larger geographic scale caps can be effective for regional problems but may not account well for local impacts



Existing Sources and “Clean” Areas (Personal View)

- Existing sources
 - If you wish reductions from all existing sources, specify levels and timing
- “Clean” Areas (including Class I areas)
 - Have States plan to protect air quality in all areas of their jurisdiction not just nonattainment areas and take it out of permitting
 - Have States and Federal Government work to protect Class I areas before there are problems.

