



**Clean Air Act Advisory Committee  
(CAAAC)  
Greenhouse Gases (GHG) Permit  
Streamlining Workgroup**

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# Presentation Outline



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# Work Group Purpose



- To develop and recommend to EPA potential streamlining approaches for GHG permitting.

# Streamlining and GHG Permitting



- Permit streamlining techniques and approaches are a key component of GHG permitting under the CAA.
- A key factor in EPA's phased-in approach to GHG permitting under the CAA is the ability of permitting authorities to issue timely permits and for sources subject to permitting to obtain and comply with those permits.
- Streamlining approaches that could help expedite permitting and make more efficient use of resources need to be developed to allow expansion of the permitting programs to smaller sources of GHG emissions.

# Final Tailoring Rule



- Published in the Federal Register on June 3, 2010
- Tailors the applicability criteria that determines which sources become subject to Greenhouse Gases air permitting requirements under the Prevention of Significant Deterioration (PSD) and title V air permitting programs
- Addresses the overwhelming burden that would have resulted if the PSD and title V requirements would have applied, as of January 2, 2011, at the 100 or 250 tons per year (tpy) levels provided under the CAA
- Relieves resource burdens by phasing in the applicability of these air permitting programs to GHG sources

# Tailoring Rule Steps



- Step 1
  - Establishes GHG applicability criteria for “anyway sources”
  
- Step 2
  - Establishes GHG applicability criteria for large sources of air emissions and retains criteria for “anyway sources”
  
- Step 3.
  - EPA proposed and requested comment on:
    - Retaining the GHG permitting thresholds at current levels
    - Various options to streamline GHG permitting for the PSD and title V air permitting programs
  - Comment period closed on April 20, 2012

# Permit Streamlining



- Integral part of the phase-in approach to GHG permitting requirements
- Has the potential to:
  - Obviate the applicability of PSD and title V requirements for some GHG-emitting sources
  - Promote more efficient treatment of GHG-emitting sources that will already be subject to these programs
  - Allow the expansion of PSD and title V applicability to more GHG-emitting sources while protecting sources and permitting authorities from undue expenses

# Permit Streamlining (Continued)



- EPA has proposed two streamlining measures as part of the recent Step 3 proposal:
  - Increasing the flexibility and improving the usefulness of plantwide applicability limitations (PALs) for GHGs
  - Creating the regulatory authority for EPA to issue synthetic minor permits for GHGs in those areas where EPA is the PSD permitting authority



# Permit Streamlining (Continued)



- EPA has also identified various streamlining measures in the Step 3 proposal:
  - Defining Potential to Emit (PTE) for various source categories
  - Establishing emissions limits for various source categories that constitute presumptive Best Available Control Technologies (P-BACT)
  - Establishing procedures for use of general permits and permits-by-rule for source categories such as boilers and emergency engines
  - Establishing procedures for electronic permitting and “lean” techniques for permit process improvements
  - Excluding “empty permits” from the title V permitting program

# GHG Permit Streamlining Work Group Charge



1. Review the EPA identified streamlining methods and source categories. Confirm, expand or narrow both the scope of streamlining methods EPA should explore further, and the source categories that may be well-suited either individually, or collectively for each streamlining approach.
2. Identify the regulatory and policy barriers associated with further development of permit streamlining methods for each of the source categories, and recommend approaches to address those barriers.
3. Prioritize the source categories and streamlining methods for further development by EPA and recommend and implementation approach for each method.

# Work Group Deliverables and Deadlines



- Work Group started in April 2012 and is to complete its work by October 2012
- Deliverables and Deadlines:
  - Draft Interim Written Report – August 15, 2012
  - Draft Final Written Report – September 15, 2012
    - To be delivered and deliberated upon by the CAAAC for submission to EPA.
    - The final report may also address the issues and potential barriers associated with further development of permit streamlining methods and recommend implementation strategies.