

Survey of Actual State NSR Reform Programs in Comparison with the Federal NSR Reform Program

ABSTRACT

U.S.EPA issued a New Source Review (NSR) reform rule on 12/31/02 with five provisions now in effect for the 10 states using the Federal PSD rules. Other states (delegated states) must submit SIP revisions to comply with these requirements by 12/31/05.

This paper is directed to those concerned with preparing construction permit applications subject to New Source Review requirements and to state air pollution control agencies concerned with incorporating the U.S. EPA's promulgated NSR reforms.

These new promulgated NSR provisions are: a) change procedure for determining Baseline actual emissions to any two years in past ten that are representative, b) change the test for a significant emissions increase triggering NSR applicability from (Potential to Emit–Actual) to ((Projected Actual–Actual), c) add the Plantwide Applicability Limitations (PALs) emission standard option, d) establish State-of-the-Art Clean Unit Test to exempt such units from further controls for designated period, and e) add a Pollution Control Project exclusion from other Clean Air Act (CAA) requirements for period of time.

This paper presents the results of a survey conducted of the delegated states in the eastern half of the U.S. concerning their plans for adopting or revising these promulgated NSR reforms. Where states plan to revise the reforms, the survey examines and summarized the specific changes from the Federal NSR Reforms.