

## Electric Power Company Responses to the Development of SIPs for Attaining the 8-Hour Ozone and the Annual Average PM<sub>2.5</sub> NAAQS: Reactive or Proactive Strategies

### Abstract:

In April 2004, U.S. EPA issued its attainment designations for the 8-hour ozone NAAQS. In January 2005, U.S. EPA issued its attainment designations for the PM<sub>2.5</sub> NAAQS.

Each state is planning to submit its State Implementation Plan (SIP) for attaining the 8-hour ozone NAAQS in 2007 and its SIP for attaining the PM<sub>2.5</sub> NAAQS in 2008.

U.S. EPA has issued a draft report to be finalized shortly for states to use in developing their 8-hour ozone SIPs. A similar report for PM<sub>2.5</sub> is under development and will be finalized in 2006. States and Regional Haze Organizations are implementing their own modeling protocols based on the U.S. EPA guidance to make the required Model Attainment Demonstrations in their SIPs.

Local control strategy evaluations and final Model Attainment Demonstrations will be made by each state designated nonattainment for ozone or PM<sub>2.5</sub>. All of this work will be completed in 2006 to provide time for states to prepare and finalize draft SIPs for implementing the conclusions of the Model Attainment Demonstrations.

One approach an electric power company can take in this SIP development process is the "Reactive" one of waiting until the proposed SIPs are developed and then in 2007 submit comments. The other approach is the "Proactive" one where the electric power company works along side the state in SIP development.

This paper outlines the steps involved in a Proactive approach working effectively with the state in SIP development in 2006. The paper also discusses strategies for achieving the most desirable outcomes from this process.