



# A Conceptual Framework for a Source-wide Multi- pollutant Strategy

a presentation to the Economic  
Incentives and Regulatory Innovation  
Subcommittee of the Clean Air Act  
Advisory Committee  
October 5, 2010



a conversation, not a  
lecture



Premises

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- A unit-by-unit approach to emission control fails to include all emission sources
- Federal, state, and local air permitting resources are not limitless
- Regulatory uncertainty results in inefficient use of capital

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Approach

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- Follow National Academy of Sciences 2004 recommendation towards a multi-pollutant, sector-based approach
- Follow OAQPS approach from May 2010 subcommittee meeting towards synchronizing multi-pollutant analysis timelines on a sectoral basis
- Re-read the Act unencumbered by forty years of accreted interpretation in advancement of the NAS and EPA objectives

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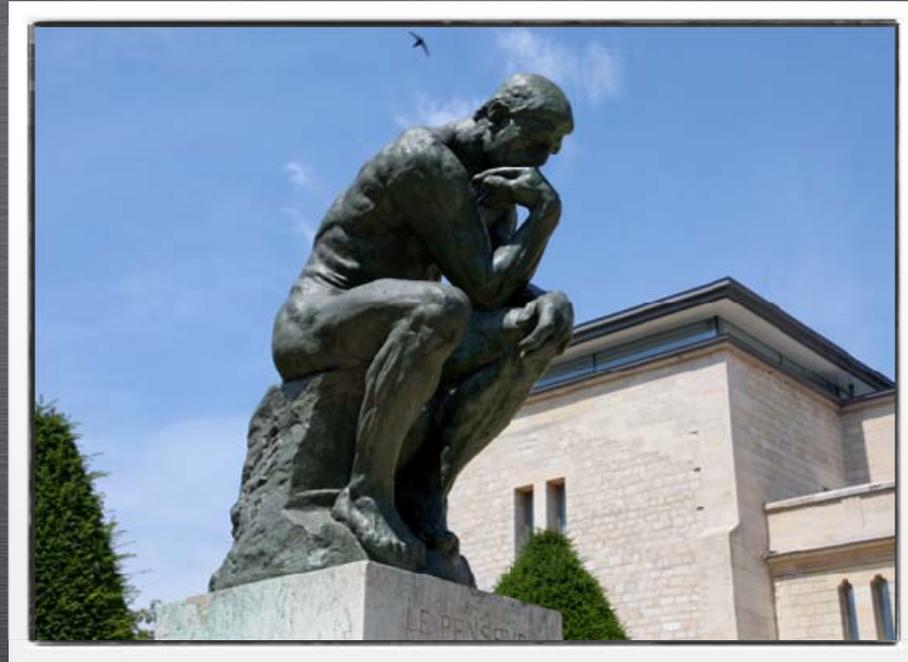
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- Define sources of pollution to which the programs apply on a sectoral basis
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- Implement Section 112(h) work practice standards
- Revise source category lists
- Expand use of HAP surrogates

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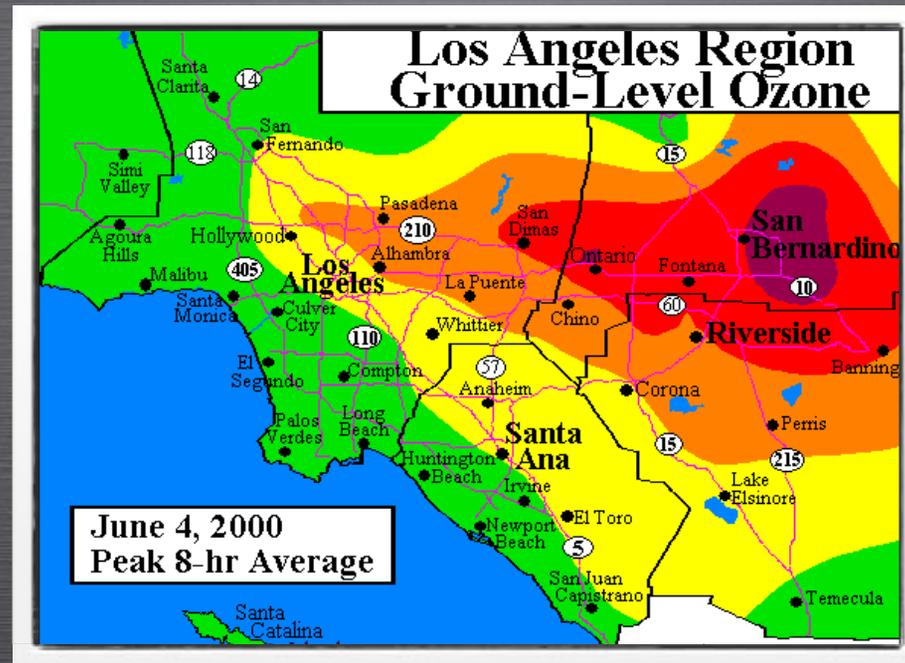
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NAAQS

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- 5/10 review/revision cycle
- Criteria pollutant groupings
  - Simultaneous; stationary versus mobile; complementary ambient impacts

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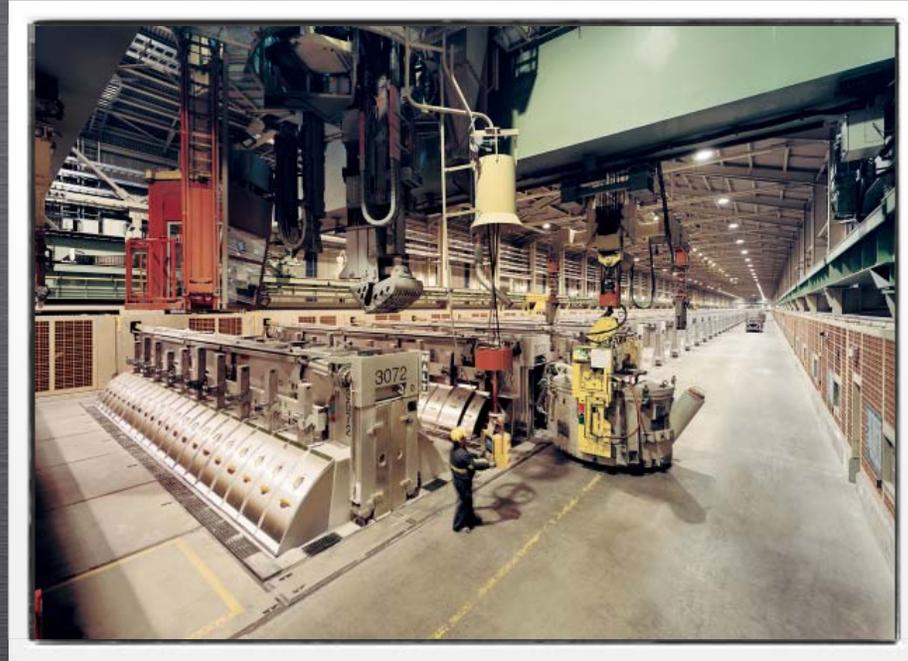
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- Plantwide applicability limits
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