

EMISSIONS MONITORING AND REPORTING REQUIREMENTS UNDER THE CSAPR UPDATE RULE

Question #1: In what states do units face a change in requirements as a consequence of the recently issued updates to the ozone season NO_x emissions requirements under the Cross-State Air Pollution Rule (CSAPR)?

Answer: Under the CSAPR Update Rule,¹ units in Kansas will become subject to ozone season NO_x requirements under CSAPR with respect to emissions starting in 2017, and units in Florida, North Carolina, and South Carolina will no longer be subject to ozone season NO_x requirements under CSAPR with respect to emissions after 2016.

Question #2: Does the CSAPR Update Rule change any aspect of the emissions monitoring and reporting requirements for units in states other than Kansas, Florida, North Carolina, and South Carolina?

Answer: The CSAPR Update Rule does not make substantive changes to the emissions monitoring and reporting requirements for units in other states. The rule divides the 23 states covered by CSAPR for ozone season NO_x emissions in 2017 and later years into two groups with separate trading programs:

- Units in Georgia will continue to be subject to the original trading program, which is being renamed the CSAPR NO_x Ozone Season Group 1 Trading Program. The emissions monitoring and reporting requirements for the Group 1 program continue to be set forth at 40 CFR 97.530 through 97.535.
- Units in the other 22 states covered by CSAPR for ozone season NO_x emissions² will be subject to the CSAPR NO_x Ozone Season Group 2 Trading Program. The emissions monitoring and reporting requirements for the Group 2 program are set forth at 40 CFR 97.830 through 97.835.
- The emissions monitoring and reporting requirements under the Group 1 and Group 2 programs are substantively identical except that the initial compliance dates are two years later under the Group 2 program than under the Group 1 program.
- Under both the Group 1 and Group 2 programs, owners and operators must continue to monitor and report ozone season NO_x mass emissions and heat input according to

¹ 81 FR 74504 (October 26, 2016).

² The states whose units are subject to the CSAPR NO_x Ozone Season Group 2 Trading Program are Alabama, Arkansas, Illinois, Indiana, Iowa, Kansas, Kentucky, Louisiana, Maryland, Michigan, Mississippi, Missouri, New Jersey, New York, Ohio, Oklahoma, Pennsylvania, Tennessee, Texas, Virginia, West Virginia, and Wisconsin.

Subpart H of Part 75, as they have done since CSAPR implementation began (with some new additional requirements for units in Kansas, as discussed below).

Note: For each unit identified as CSAPR-affected under either the Group 1 program or the Group 2 program, EPA will add an appropriate program code in the Clean Air Markets Division (CAMD) Business System with a begin date of May 1, 2017.

Question #3: What are the emissions monitoring and reporting requirements and compliance dates for units in Kansas that are subject to the CSAPR NO_x Ozone Season Group 2 Trading Program?

Answer: Since January 1, 2015, units in Kansas have been monitoring and reporting NO_x mass emissions and heat input year-round according to Subpart H of Part 75, under the CSAPR NO_x Annual Trading Program. Therefore, no changes to the monitoring *methodologies* currently in use are required. However, now that units in Kansas will be subject to the CSAPR NO_x Ozone Season Group 2 Trading Program as well, the owner or operator of each affected unit must:

- Ensure that a revised Certificate of Representation is submitted appointing the same Designated Representative for the CSAPR NO_x Ozone Season Group 2 Program as for the CSAPR NO_x Annual Trading Program and CSAPR SO₂ Group 2 Trading Program. This may be done using the CAMD Business System.
- Work with the unit's Data Acquisition and Handling System (DAHS) vendor to ensure that quarterly and cumulative ozone season NO_x mass emissions and heat input values are calculated and reported, starting with the 2017 ozone season (i.e., May 1 through September 30, 2017).

Question #4: What are the changes to the emissions monitoring and reporting requirements for units in Florida?

Answer: Since Florida units will no longer be subject to emissions monitoring and reporting requirements for ozone season NO_x emissions under CSAPR and Florida units are also not subject to the CSAPR NO_x Annual Trading Program or the NO_x SIP Call, owners or operators of affected units in Florida must proceed as follows.

- If the unit is in the Acid Rain Program or is required to use the Emissions Collection and Monitoring Plan System (ECMPS) to submit quarterly electronic data reports (EDRs) under the Mercury and Toxics Standards (MATS) rule (e.g., if mercury emissions are continuously monitored):
 - Discontinue reporting NO_x mass emissions data after the end of 2016 - work with the DAHS vendor, as necessary; and

- Deactivate each record in the electronic monitoring plan associated with the NO_x mass emissions methodology, by adding an end date of December 31, 2016.
- If the unit is not in the Acid Rain Program and is not required to submit quarterly EDRs under the MATS rule:
 - Discontinue submitting Part 75 emissions reports after the end of the 2016 ozone season if the unit is reporting on an ozone season-only basis, or after the end of 2016 if the unit is reporting on an annual basis.

Note: For each unit identified as CSAPR-affected in Florida, EPA will close out the CSAPR NO_x Ozone Season Trading Program code (“TRNOXOS”) in the CAMD Business System, with an end date of December 31, 2016.

Question #5: What are the changes to the emissions monitoring and reporting requirements for units in North Carolina and South Carolina?

Answer: Even though North Carolina and South Carolina will no longer be subject to emissions monitoring and reporting requirements for ozone season NO_x emissions under CSAPR, they remain covered by the CSAPR NO_x Annual Trading Program and the NO_x SIP Call. Therefore, owners or operators in these States must continue to monitor and report quarterly, year-to-date, and annual and ozone season NO_x mass emissions and heat input data for the affected units according to Subpart H of Part 75, as they have done since CSAPR implementation began.

Note: For each unit identified as CSAPR-affected in North Carolina and South Carolina, EPA will close out the CSAPR NO_x Ozone Season Trading Program code (“TRNOXOS”) in the CAMD Business System, with an end date of December 31, 2016. In addition, the Agency will add the program code “SIPNOX”, with a begin date of January 1, 2017.

Question #6: If I have any questions about the Cross-State Air Pollution Rule Update, whom should I contact?

Answer:

1. For questions about emissions monitoring and reporting, please contact your EPA Regional Analyst. A list of emissions monitoring contacts can be accessed at:

<https://www.epa.gov/airmarkets/emissions-monitoring>

2. For questions about allowance allocations for the CSAPR NO_x Ozone Season Trading Group 1 and Group 2 Trading Programs, please contact Paula Branch, at (202) 343-9168 or at branch.paula@epa.gov. For questions about allowance reconciliation, please contact Kenon Smith, at (202) 343-9164 or at smith.kenon@epa.gov.

3. For questions about the CAMD Business System and/or Certificates of Representation, please contact either Craig Hillock, at (202) 343-9105 or at hillock.craig@epa.gov, or Laurel DeSantis, at (202) 343-9191 or at desantis.laurel@epa.gov.