

Finding a Better Way to Cleaner Air– Revisiting the SIP Process

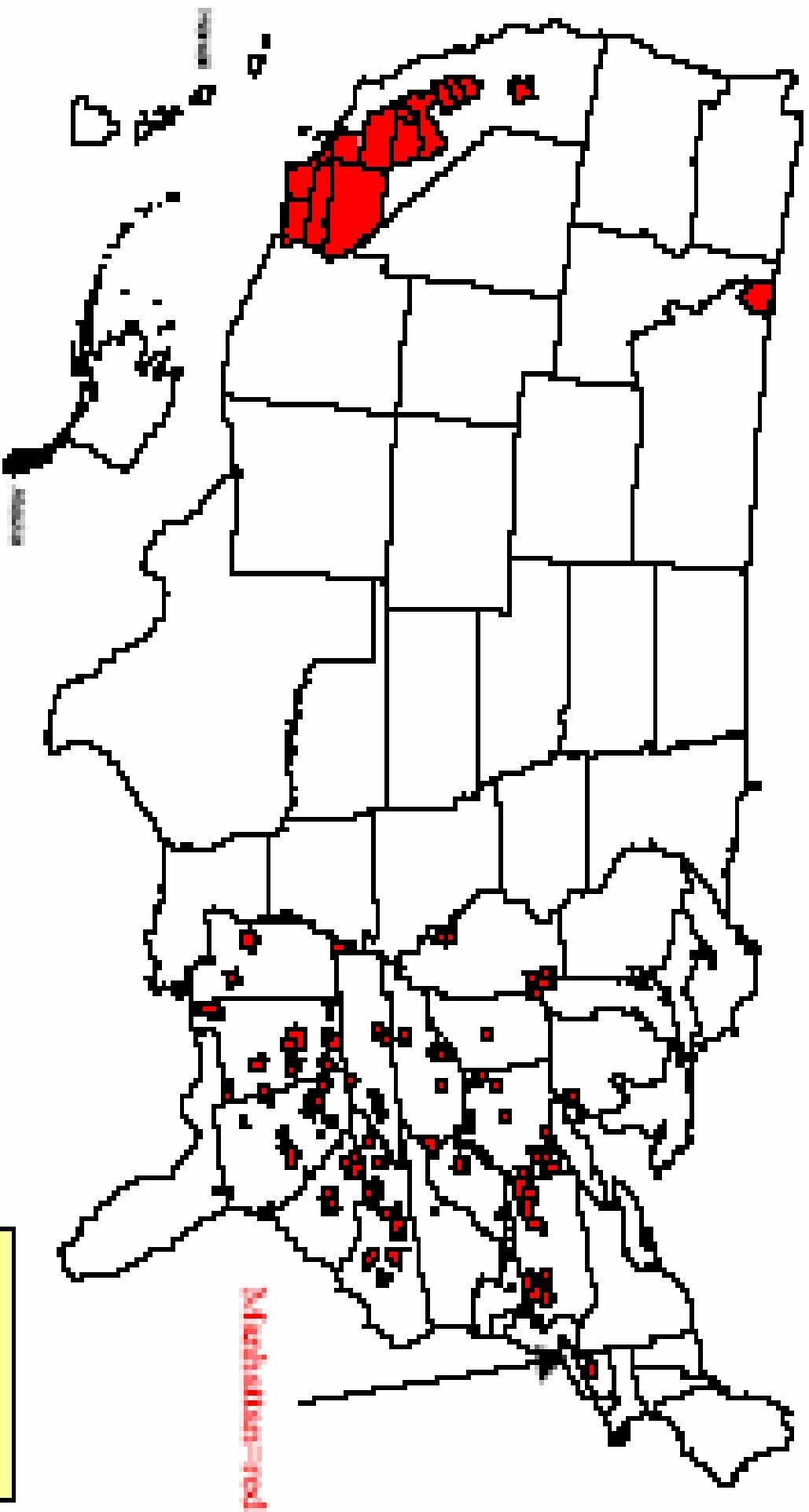
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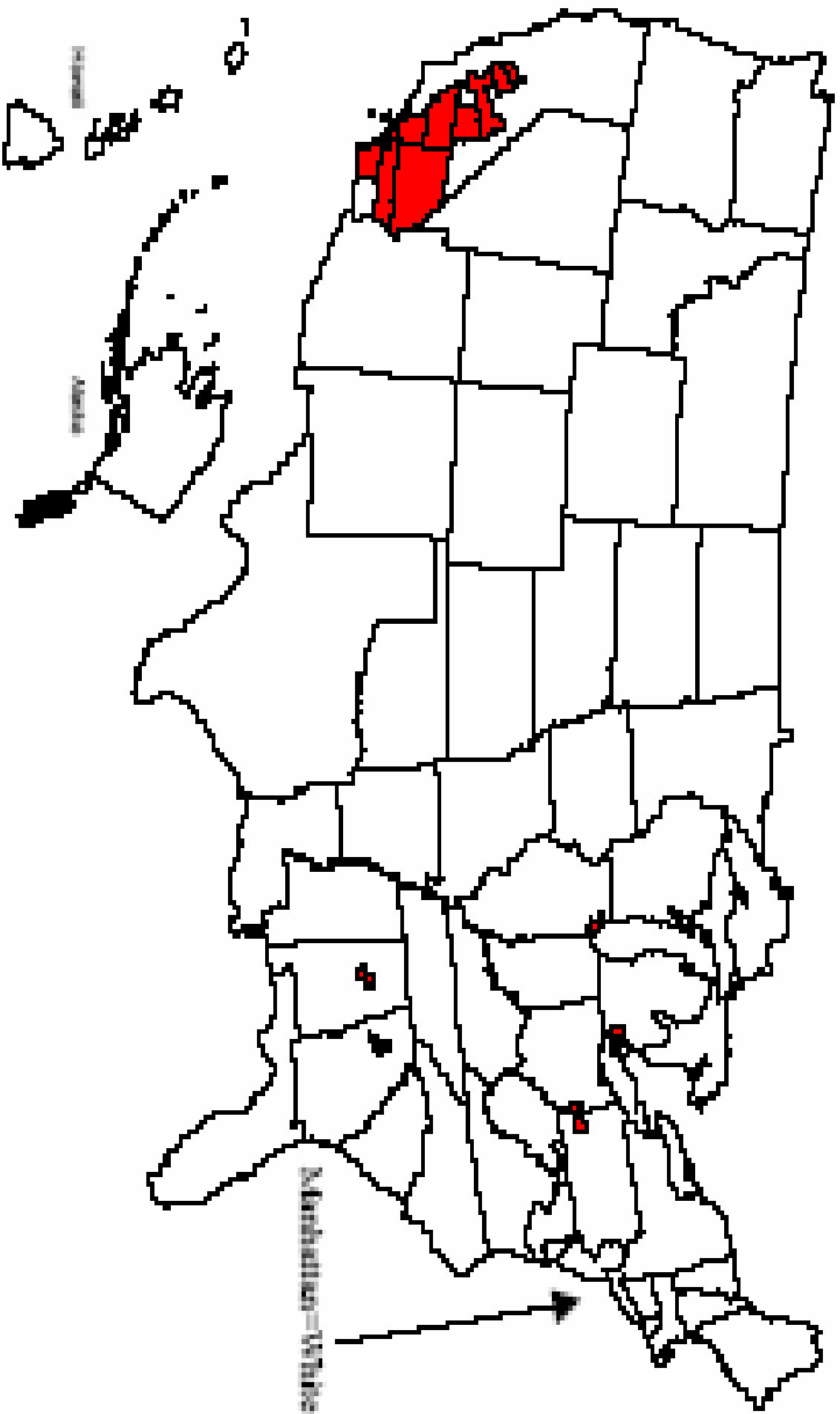
Counties Exceeding the Annual Fine Particle Standard in 2001



129 Nonattainment Counties

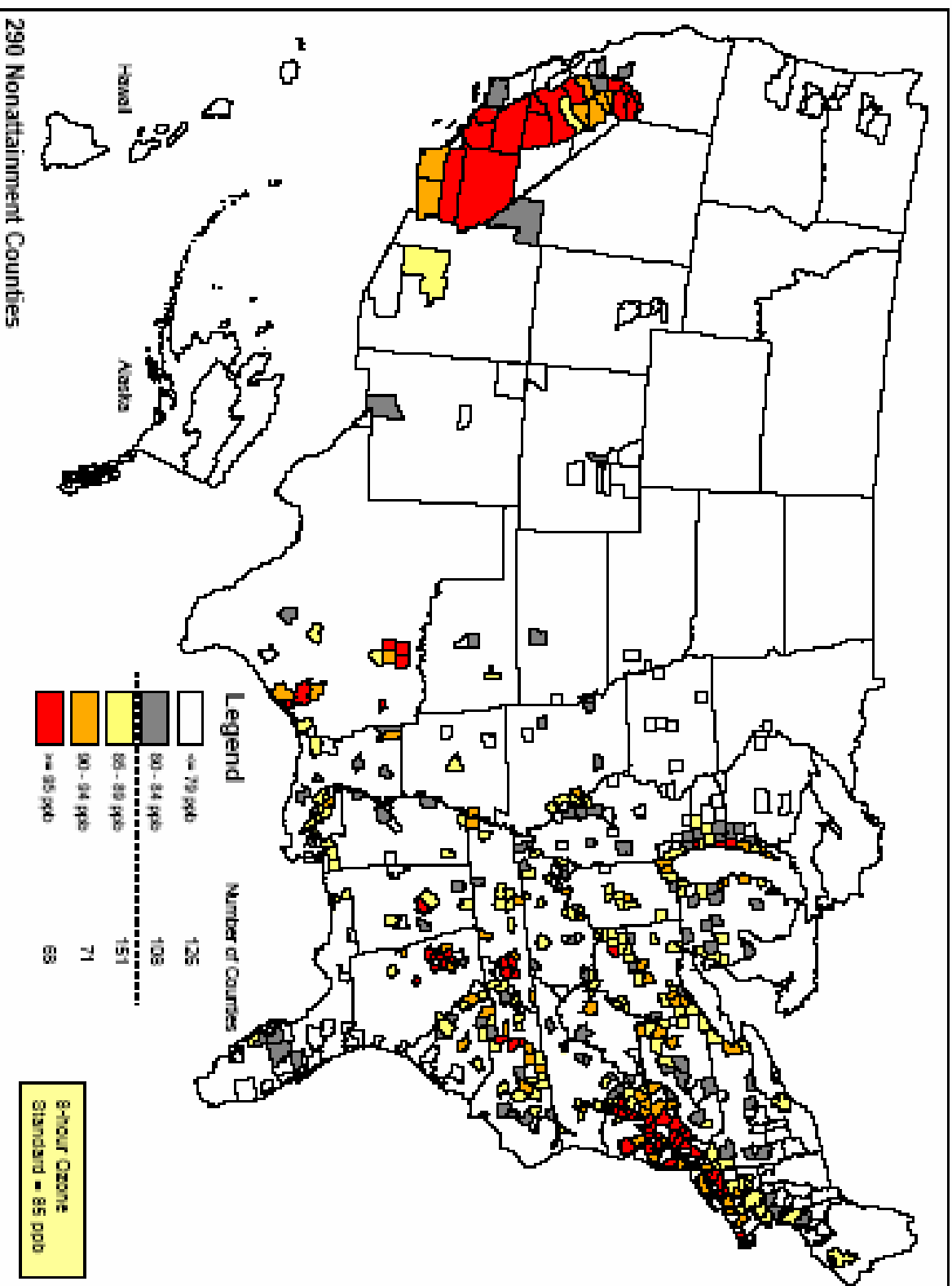
PM2.5
standard =
15 µm³

Remaining Counties Likely to Exceed the Annual
Fine Particle Standard with Clear Skies in 2020



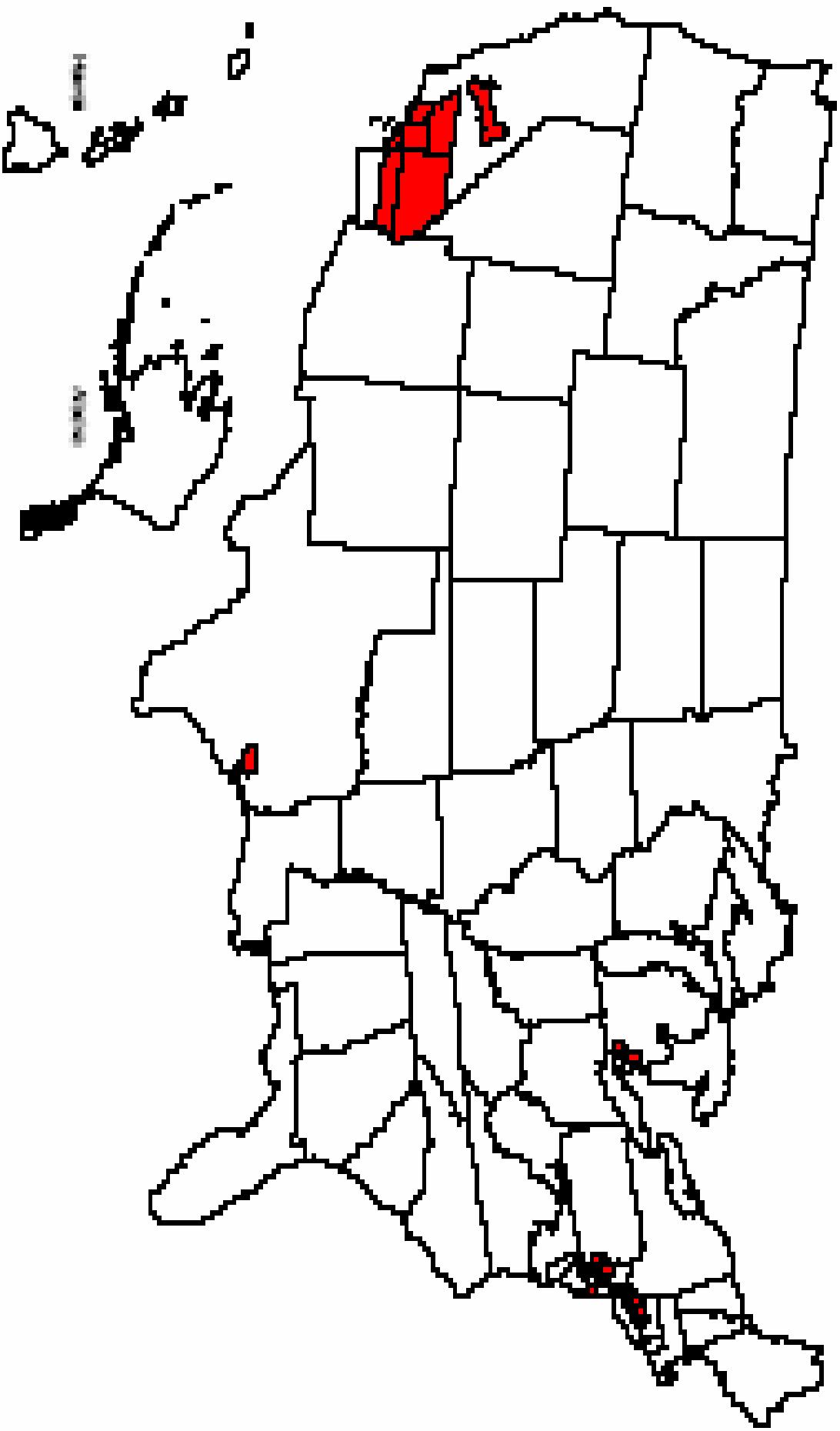
18 Nonattainment Counties

Current Projected Attainment in the US with the 8-hour Ozone Standard



- There are 290 counties nationwide (268 counties in the East) that exceed the 8-hour ozone standard.
- 111 million people (87 million people in the East) live in counties that would not meet this standard.

Remaining Counties Likely to Exceed the 8-hour
Ozone Standard with Clear Skies in 2020



27 Nonattainment Counties

State Implementation Plan

- State must develop plan showing attainment
- SIP contains:
 - Emissions inventories
 - Photochemical modeling
 - Control strategies/regulations
- Huge, complex documents that require constant review and revision

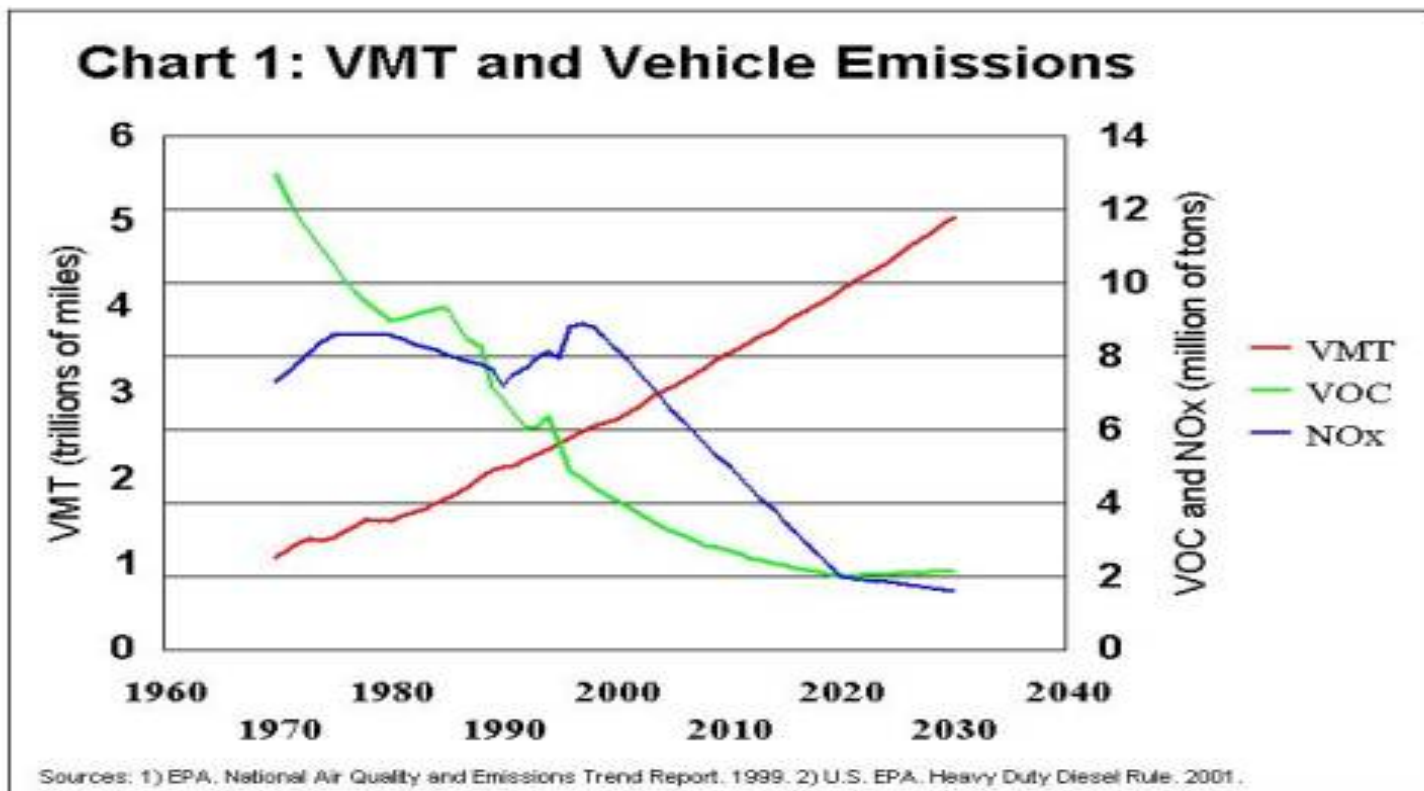




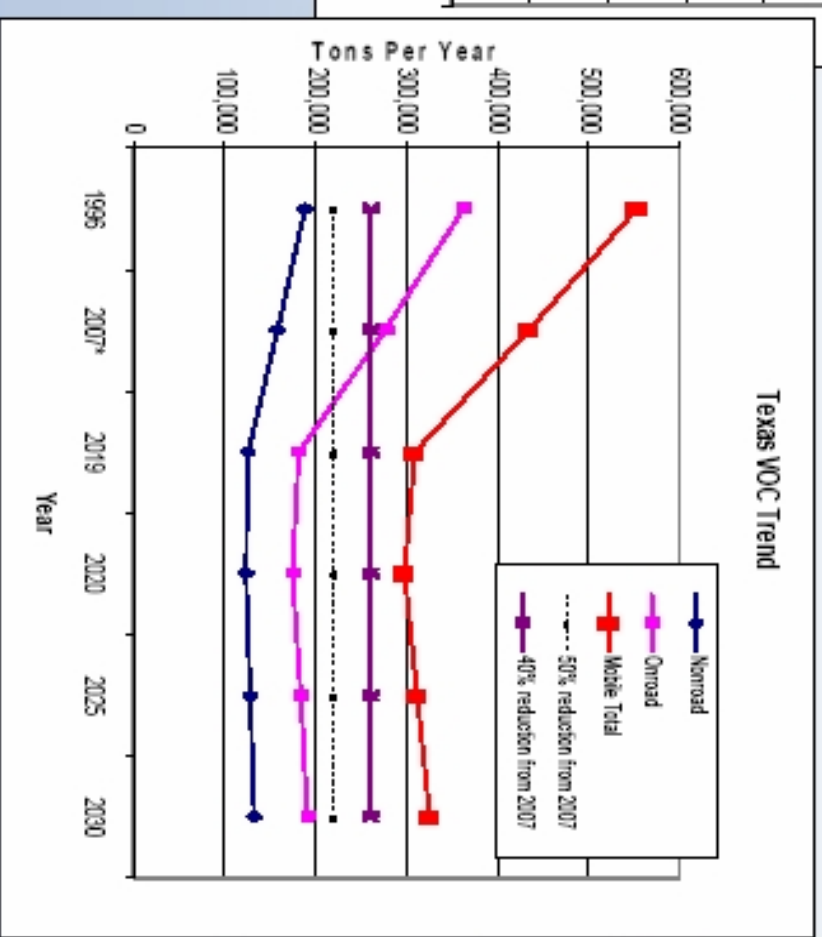
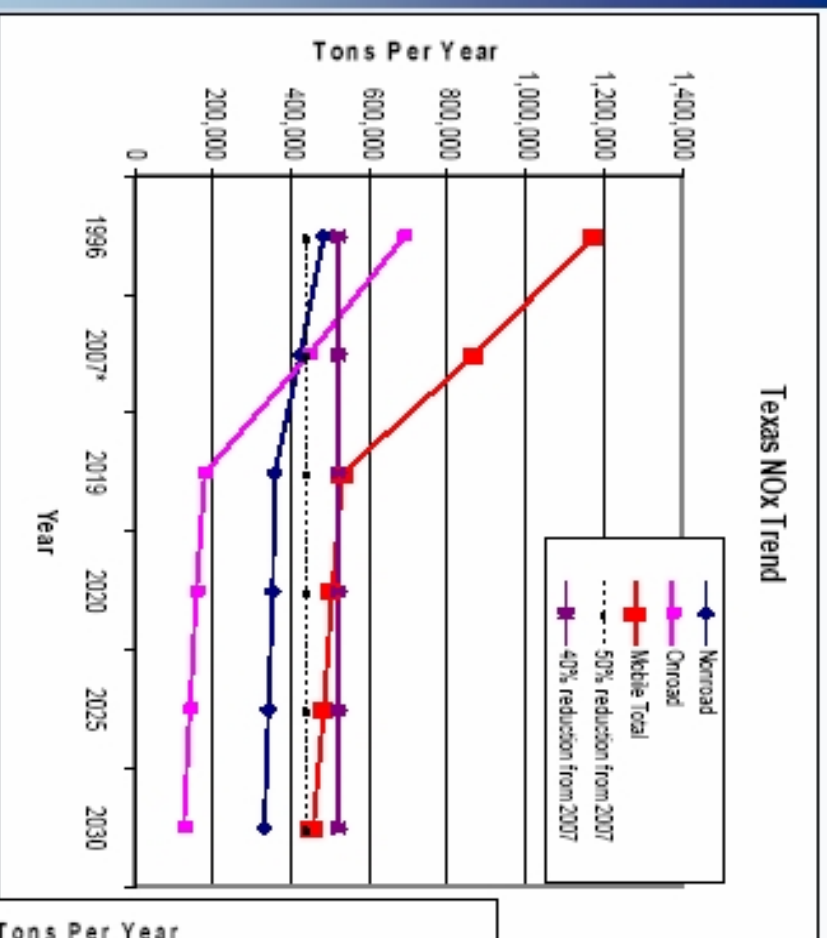
Problems with SIPs

1. Federal controls
2. Preempted sources
3. Pollutant transport
4. Local controls more costly less effective
5. Procedure over results
6. Short-term solutions
7. Litigation, political wrangling and delay

Federal Controls Marginalizing Effectiveness of SIPs



Federally Mandated Motor Vehicle Controls in Texas

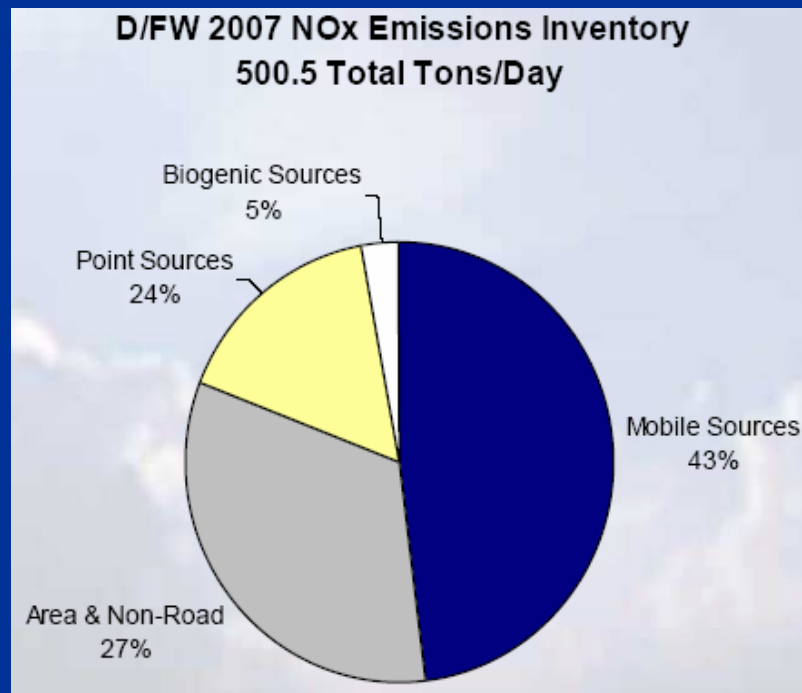


Implication: While modeling suggests that ~50% MV controls might yield attainment, this level of reduction not scheduled to occur until 2019 - too late!

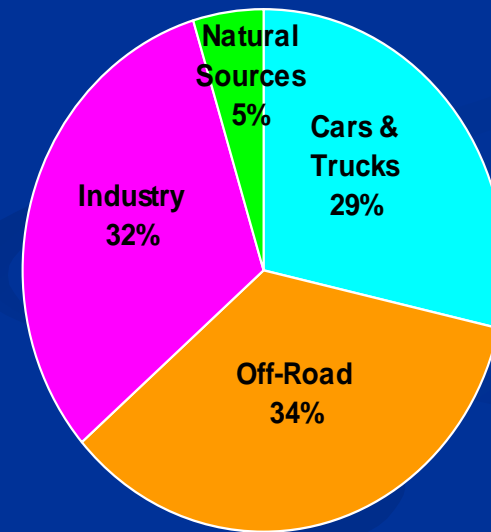
Source: VISTAS (2004)

Preemption: States Don't Have the Tools to Do the Job

Dallas 2007



Houston 2007



Local SIP Controls More Expensive than Federal

**Table 3.5-Policy Cost Effectiveness
TNRCC SIP**

	Annualized 2007 Cost (\$Millions) ^a	NO _x /Day Reduction (Tons)	Cost Effectiveness (\$/Ton) ^a
Federal	140	166	2,306
State			
Point Source	1,446	599	58,924 ^b
Inspection/Maintenance	52	42	3,400
Construction	1,512	7	618,220
Texas Cleaner Diesel Fuel	75	7	29,989
Lawn Service	7	1	16,627
Accelerated Tier 2/3	341	12	76,672
Air Conditioners	204	13	43,063
55 Mph Speed Limit	196	18	29,460
Diesel Emulsion Fuel	72	11	18,487
Vehicle Idling Restrictions	11	1	32,676
Other State	56	24	6,388
Local	126	22	15,572

Local SIP Controls Generally Less Effective and Enforceable than Federal

- No-drive days
- 55 mph limit
- Idling restriction
- Delay commercial hours
- Reduced power take-offs
- Barbecue ban



SIPs Place Emphasis on Process over Results

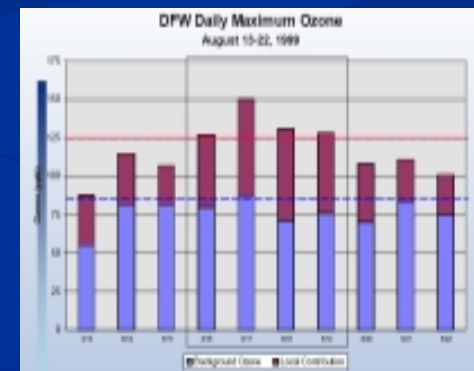
- Huge, complex documents requiring constant review and revision
- More important to have EPA approved SIP than to achieve attainment
- Little incentive to evaluate real-world control effectiveness

SIPs Focus States on Short-Term

- Houston Control Development Deadline Mar. 2006
- Rule Development Deadline Sept. 2006
- All Controls Implemented **Dec. 2008**

Interstate Transport More of an Issue

- EPA found in CAIR that Arkansas significantly contributes to Houston ozone
- TX in CAIR because impacts 2 counties in Illinois
- Over 1/2 of ozone in DFW is background
- Cannot tell another state what to do



SIPs Lend Themselves to Litigation, Political Wrangling and Delay

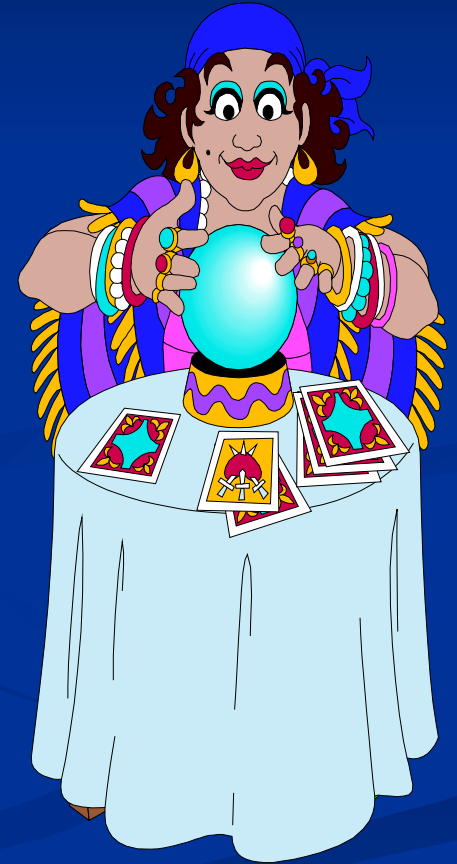
Ex./ Houston 8-hour SIP

- 2010 attainment deadline
- 2007 SIP submittal
- **50-85%** NO_x and VOC reduction needed



No Need for a Crystal Ball – The Future of the Houston 8-hour SIP

- Attainment will not occur by 2010
- Additional time provided, but not until 2007
- Millions spent in the mean time developing unviable control strategies that will eventually be thrown out



Moving Toward a Solution: A Potential Approach

1. Remove SIP process

- Allows states to focus more on local pollution concerns and reducing emissions

2. Give EPA responsibility to achieve NAAQS

- Federal standards
- Can regulate all sources
- Removes interstate transport issue
- States assist EPA

Concerns

- Politically this is not the right time
- This effort will take too long
- This is not my responsibility—I just want to do my job
- I benefit from the status quo
- This issue is too big and is better handled by policy makers in Washington



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