

## CSAPR, The Unfriendly Ghost



No, I didn't misspell Casper; CSAPR is the new EPA ruling restricting the emission of sulphur dioxide from carbon based fuel burning facilities, like our White Water Valley Station (WWVS). The new Cross- State Air Pollution Rule, CSAPR, will start limiting the emission levels for WWVS in 2012. Early estimates indicate the RP&L has been allocated only enough allowances to generate 1-2 months next year.

If enacted, this drastic change in the emission allowance will cause a major change in the operation at WWVS next year. We may cease operation and sell the allowances, value yet to be determined; we may generate small amounts to get us through the winter months or wait to generate during our most profitable time of the year. Some major decisions such as coal purchases and capacity revenues all depend on the amount of generation completed during the year, so this ruling has a major effect on RP&L. The rule has not been finalized yet, but it is a scary situation.

Fortunately, our *Energy From Waste* project will provide us with more options in 2013. Unlike Casper, this ghost is not transparent and has major political implications. We will monitor the situation closely and adjust our operations accordingly.

Steve Saum  
CEO, Richmond Power & Light

### From the EPA

The Environmental Protection Agency web site defines the CSAPR ruling to be known as

“... the Cross-State Air Pollution Rule (CSAPR), requires 27 states to significantly improve air quality by reducing power plant emissions that contribute to ozone and/or fine particle pollution in other states.”

Read more:

<http://www.epa.gov/crossstaterule/index.html>

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### Cross-State Air Pollution Rule (CSAPR)

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#### Cross-State Air Pollution Rule (CSAPR)

On July 6, 2011, the US Environmental Protection Agency (EPA) finalized a rule that protects the health of millions of Americans by helping states reduce air pollution and attain clean air standards. This rule, known as the Cross-State Air Pollution Rule (CSAPR), requires 27 states to significantly improve air quality by reducing **power plant** emissions that contribute to **ozone** and/or **fine particle** pollution in other states.

This rule replaces EPA's 2005 **Clean Air Interstate Rule (CAIR)**. A December 2008 court decision kept the requirements of CAIR in place temporarily but directed EPA to issue a new rule to implement Clean Air Act requirements concerning the transport of air pollution across state boundaries. This action responds to the court's concerns.

In a separate but related regulatory action, EPA also issued a **supplemental notice of proposed rulemaking (SNPR)** to require six states – Iowa, Kansas, Michigan, Missouri, Oklahoma, and Wisconsin – to make summertime NO<sub>x</sub> reductions under the CSAPR ozone-season control program. Five of those states are already covered in the final rule for interstate fine particle pollution (PM<sub>2.5</sub>). With the inclusion of these states, a total of 26 states would be required to reduce ozone-season NO<sub>x</sub> emissions to assist in attaining the 1997 8-Hour Ozone **National Ambient Air Quality Standards (NAAQS)**. Finalizing this supplemental proposal would bring the total number of covered states under the CSAPR to 28. EPA issued a proposal instead of a final action for these states in order to provide additional opportunity for public comment on their linkages to downwind nonattainment and maintenance areas. EPA is proposing to finalize this proposal by late fall 2011.

- [Read more about the Cross-State Air Pollution Rule \(CSAPR\)](#)
- [Press Release](#)
- [Presentation Updated July 18, 2011 \(PDF 33pp, 1.80 MB\)](#)
- [Fact Sheet Updated July 18, 2011 \(PDF 7pp 138 kb\)](#)
- [Recording of Webinar presented on July 7, 2011 on "CSAPR Website Walkthrough" \(www.epa.gov\)](#)
- [Public Docket for CSAPR](#)

**The Cross-State Air Pollution Rule provides cleaner air and health for Americans**