

**Comparison of Key Provisions of
STAPPA/ALAPCO's Principles for a Multi-Pollutant Strategy for Power Plants
to the
Administration's Clear Skies Act of 2002**

February 26, 2003

STAPPA/ALAPCO Principles for a Multi-Pollutant Strategy for Power Plants	Administration's Clear Skies Act of 2002 (S. 2815/H.R. 5266)
Pollutants: Address all significant emissions from power plants	Pollutants: Sets emission caps for 3 pollutants – SO ₂ , NO _x and Hg
Timing/Deadlines: Regulate power plant emissions on an expeditious schedule Establish interim and final deadlines, with first interim compliance requirements to take effect quickly	Timing/Deadlines: Implements pollutant caps in two phases: <ul style="list-style-type: none"> • Phase 1 caps begin 2010 for SO₂ and Hg, 2008 for NO_x • Phase 2 caps do not begin until 2018 and do not become fully effective until mid-2020s, due to banking Postpones attainment date for all 8-hour ozone and PM _{2.5} areas designated "transitional" until December 30, 2015
Emission Limits: Cap emissions to establish the most stringent enforceable national emission reduction goals feasible Reflect the installation of BACT or better technology on all existing units nationwide Require each existing power plant to meet a minimum level of control by the final compliance date	Emission Limits: SO ₂ caps: <ul style="list-style-type: none"> • 4.5 million tons – Phase 1 • 3.0 million tons – Phase 2 (includes a second, "nested" cap for some WRAP states) NO _x caps (divided among Zone 1 and Zone 2): <ul style="list-style-type: none"> • 2.1 million tons – Phase 1 • 1.7 million tons – Phase 2 Hg caps: <ul style="list-style-type: none"> • 26 tons – Phase 1 • 15 tons – Phase 2
Impact on Current Clean Air Act: Supplement, but do not supplant, the existing Clean Air Act For new units, retain existing NSR requirements; for existing units, require installation of BACT on affected units at the time of modification	Impact on Current Clean Air Act: Repeals NSR, BART and many PSD requirements for major sources Repeals LAER, offset requirements and conformity for most areas of the country (all those designated as "transitional") Repeals Utility MACT rule, including regulation of non-mercury HAPs Repeals residual risk requirements for mercury Prevents application of Section 126 rules until 2012, at which time downwind area must demonstrate that all more cost-effective measures have been implemented
Impact on State/Local Authority: Preserve authority of states, localities and regional groups to adopt and/or implement more stringent programs	Impact on State/Local Authority: Prevents states from taking credit in SIPs for any NSR or PSD requirements applied to affected units
Protection Against Adverse Local Impacts: Protect against any adverse local health and environmental impacts	Protection Against Adverse Local Impacts: Relaxes Class I protections and eliminates some important PSD requirements for other areas Allows mercury trading without regard for local impacts