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**Supporting NSRP Shipyards in the  
Implementation of Recently-Generated  
Emissions Factors at the Federal, State, and  
Local Level**



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# Presentation Outline

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## Background

- U.S. EPA and shipyard representatives agree that current emissions factors data sets are limited in quantity and quality
- NSRP has taken a proactive approach to improve this by funding various projects to generate new emissions factors data
- October 2009 - U.S. EPA issues “Emissions Factors Program Improvements” through Advance Notice of Proposed Rulemaking (ANPR)
- U.S. EPA requested public comment on Agency’s initial ideas for improvements to emissions factors program



# ANPR for Emissions Factors Program Improvements

- U.S. EPA goals for emissions factors program:
  - Produce high quality emissions factors more quickly
  - Better indicate precision and accuracy of emissions factors
  - Encourage appropriate use of emissions factors
  - Provide more performance test data for emissions factors development
  - Improve emissions quantification
- U.S. EPA multi-part process to improve emissions factors program:
  - Enhance existing electronic reporting tool (ERT)
  - Upgrade current system for compiling and retrieving emissions factors information (WebFIRE)
  - Rewrite existing emissions factors development procedures document
- Agency also considering requiring industries to submit certain performance testing information to acquire adequate data for development or improvement of emissions factors



# Industry Impact and Opportunity

- Potential Regulatory Impact
  - Potential to significantly alter regulatory landscape with regard to emissions factors used for regulatory reporting purposes
  - Acceptance of improved emissions factors has potential to reduce shipyard regulatory burden and associated compliance costs
- Industry Opportunity
  - Take advantage of opportunity and take active role in the process
  - Engage with regulatory agencies at all levels (Federal, state, and local) is critical in determining how upcoming changes will impact individual shipyards and the industry overall



## Response to Industry Need

- CTC developed white paper to support the industry in:
  - Preparing for upcoming changes in the Federal emissions factors program
  - Implementing newly generated emissions factors at various regulatory levels
- BAE Systems San Diego Ship Repair:
  - Provided valuable information in development of white paper
  - Offered cost share critical to supporting the implementation portion of project
- Expectation of Award - February/March 2010



## Project Objectives

1. Prepare the industry for upcoming changes in Federal Emissions Factors Program
2. Submit data generated from the past NSRP ET Panel Project “Developing Emissions Factors for Electrodes Commonly Used within the Shipbuilding Industry” to U.S. EPA and hold open discussions with U.S. EPA to influence how data will be utilized to support upcoming changes in the Federal Emissions Factors Program
3. Determine current practices used by shipyards to report welding emissions to Federal, state, and local regulatory agencies, and identify requirements for updating/revising emissions factors
4. Support up to two shipyards in submitting data generated from past NSRP ET Panel Project to local and/or state regulators for use in reporting welding emissions



# Project Approach

- **Task 1 – Provide Support at the Federal Level**
  - Support submittal of emissions factors developed in the past Panel project to U.S. EPA
  - Present industry’s comments/recommendations to U.S. EPA and discuss intended use for submitted emissions factors
- **Task 2 – Provide Support at the State Level**
  - Complete data gathering exercise to determine states using alternative emissions factors and criteria upon which those factors are based
  - Prioritize states having highest need for implementation of updated emissions factors
- **Task 3 – Provide Support at the Local Level**
  - Select shipyard and accompanying local regulatory agency in up to two states for analysis of local emissions reporting/regulatory process
    - State One: California, due to increased regulatory concerns
    - State Two: To be selected based on findings of Task 2
  - Meet with local regulators at each selected shipyard in effort to secure acceptance of newly generated emissions factors at local level



## Task 1 - Federal Support

- March – April, 2010: Support Panel in submitting newly developed emissions factors to U.S. EPA
- April 30, 2010: Outline process to initiate discussions regarding use of emissions factors. Process will consist of:
  1. Providing proposed emissions factors to U.S. EPA for review
  2. Collecting input from across industry on U.S. EPA's proposed "Emissions Factors Program Improvements"
  3. Presenting industry's comments/recommendations to U.S. EPA in a formal letter; and,
  4. Requesting a meeting with U.S. EPA to discuss proposed improvements, industry's comments/recommendations, and intended use for submitted emissions factors.



## Task 1 - Federal Support

- June, 2010: Brief NSRP ET Panel on U.S. EPA's "Emissions Factors Program Improvements", as proposed in October 2009 ANPR
- July/August, 2010: Distribute briefing to all shipyards that participated in past Panel project, along with request to submit concerns/questions/comments/recommendations regarding U.S. EPA's ANPR
- September/October, 2010: Consolidate responses and summarize major points in letter that can be submitted to U.S. EPA, along with request for meeting with POCs that were involved in the past Panel Project



## Task 2 – State Support

- April/May, 2010: Complete data gathering exercise to determine states using alternative emissions factors and criteria upon which factors are based
  - Completed through use of shipyard surveys, a review of individual state reporting requirements, and discussions with individual shipyards
- June, 2010: Use information obtained to prioritize states having highest need for implementation of updated emissions factors
- July, 2010: Present findings in “State Emissions Factors Reporting Summary”



## Task 3 – Local Support

- July, 2010: Select shipyard and accompanying local regulatory agency in up to 2 states for analysis of local emissions reporting/regulatory process
  - State One: California, due to increased regulatory concerns
  - State Two: To be selected based on findings of Task 2
- August/September, 2010: Conduct site visit at each selected shipyards to meet with local regulators in effort to secure acceptance of newly generated emissions factors at local regulatory level



## Task 4 – Final Summary Report

- February, 2011: Prepare Final Report that includes:
  - Objectives of project
  - Progress made against objectives
  - Results
  - Benefits (quantitative and qualitative)
  - Conclusions
  - Recommendations for shipyards that plan to submit welding emissions data to regulatory agencies in future



# Questions?



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