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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



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 process
 - Engage with regulatory agencies at all levels (Federal, state, and local) critical to determining and *influencing* how upcoming changes will impact individual shipyards and industry overall



Response to Industry Need

- *CTC* developed white paper to support 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 support implementation portion of project
- Awarded – March 2010



Project Objectives

1. Prepare industry for upcoming changes in Federal Emissions Factors Program
2. Submit data generated from past NSRP SP-1 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 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 SP-1 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 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 Accomplishments

- March – April, 2010: Developed a process to initiate discussions regarding use of emissions factors.
 1. Provide proposed emissions factors to U.S. EPA for review
 2. Collect input from across industry on U.S. EPA's proposed *Emissions Factors Program Improvements*
 3. Present industry's comments/recommendations to U.S. EPA in formal letter
 4. Schedule and conduct a meeting with U.S. EPA to discuss proposed improvements, industry's comments/recommendations, and intended use for submitted emissions factors.
- Outlined this approach in project deliverable: *Letter to Accompany the Emissions Factors that will be Submitted to the U.S. EPA* (submitted 4/29/10)



Task 1 - Federal Support Path Forward

- June, 2010: Brief NSRP SP-1 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 NSRP SP-1 Panel Project



Task 2 – State Support Accomplishments

- May, 2010: Developed a questionnaire to collect shipyard specific data regarding reporting procedures for welding emissions.
- May/June, 2010: Conducted data gathering exercise to determine if and/or what states provided alternative emissions factors for reporting welding emissions.
- June, 2010: Distributed questionnaire to 21 shipyards.



Task 2 – State Support Path Forward

- July, 2010:
 - Review data obtained from the questionnaire.
 - Present findings in “State Emissions Factors Reporting Summary” (To be submitted July 30, 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



Task 3 – Local Support Path Forward

- Fall, 2010:
 - Conduct site visit at each of 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

- January/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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