Possible Roundtable Discussion Topics

Coordination of Stationary Source Air Pollution Control Regulations

1. How could stationary source air pollution regulation be better coordinated in your industrial sector?
2. What kind of regulatory integration problems is your industry facing right now? (e.g. reporting, compliance).
3. What are the advantages and disadvantages of various regulation implementation time-lines?
4. What are the benefits of increased regulatory coordination for this sector? What are the disbenefits?
5. What are the regulatory and legal challenges to implementing alternative sector-based approaches?
6. How should the coordination of regulatory timelines begin within a sector?
7. How should the record keeping, monitoring and reporting requirements of various regulations be harmonized or changed in a sector approach?
8. What additional regulations, beyond those being considered in the EPA sector approach for your industry, should be considered in an integrated approach?
9. What are the market-based mechanisms that EPA should be investigating for sector-based approaches that would help the sector to be more efficient?
10. What are the implications for local, state and regional air quality planning efforts of a sector or multi-pollutant effort?
11. What is the best way to "group" emission sources within your industrial sector or facility for the purposes of coordinated regulation and technical control? What are the co-location and spatial considerations?
12. What are the challenges of reforming air pollution source category definitions from unit-by-unit to facility-wide definitions?
13. What are the challenges of developing emission standards for air toxics (NESHAPS) and criteria air pollutant programs (NSPS) based on a common set of regulated air pollutants?
14. What are the challenges of coordinating the periodic revision of the NAAQS with the required updates of NESHAPS and NSPS standards?
15. What are the challenges of utilizing work practice standards in situations where quantifiable emission limitations and reductions are needed?

o ?

Advanced Air Pollution Control Technology

1. What is the relationship between MACT and NSPS technology reviews?
2. Which advanced technologies will assist in controlling multiple types of air pollution for this sector?
3. What are the co-benefit, energy, research and deployment implications of these technologies in these sectors?
4. How can EPA better incentivize facilities to replace outdated or poorly performing equipment and improve energy efficiency while reducing malfunctions in these sectors?
5. Are there financing and investment programs that can be utilized to help implement sector-based approaches and specific technologies?
6. Are there processes or operational innovations anticipated in the future that will likely have a significant impact on source air pollution emissions in the sector? If so, what are they?
7. What are the unique financial challenges of moving towards more integrated approaches to air pollution control in these sectors?

8. What are the roles of emission monitoring technologies and policies in facilitating multi-pollutant sector approaches?
9. What are the pollutant trade-offs, if any, of combined heat and power technology for your industry?

o ?

Integrating Energy Efficiency into Air Pollution Control Practices

1. What is the best way to incorporate energy utilization and greenhouse gas emission reduction goals into existing air pollution control strategies?
2. What is the interaction between energy utilization/efficiency efforts and conventional air pollution control strategies? Would different forms of regulation (e.g. output-based regulations) help increase energy efficiency or reduce fuel consumption and achieve greater emissions reductions?

o ?

Environmental and Community Considerations

1. Will a sector-based, multi-pollutant strategy optimize the reduction of air pollution emissions for this sector?
2. Which policies in particular have the best chance of producing additional "co-benefits?"
3. Will these strategies increase the economic competitiveness of the facilities within the sector and will they benefit the community?
4. How should unintended consequences of integrated strategies be identified prior to implementation?
5. Do integrated, multi-pollutant approaches require unique public comment and communication strategies?
6. Will multi-pollutant, sector-based approaches advance the consideration and reduction of cumulative health effects?
7. Could output-based regulations (e.g. amount of emissions per unit of production) facilitate energy efficiency, reduce fuel consumption and achieve greater emissions reductions in these sectors? What are the legal challenges to implementing an output-based standard?
8. What are the challenges of utilizing plant-wide applicability limits (PALS) or other forms of averaging emission reductions within a facility's fenceline and what are the community considerations of such approaches?

o ?