

Expand Regulation 7 Applicability to the Entire Non-Attainment Area

Description of the issue

This strategy to reduce ambient ozone levels within the non-attainment area (NAA) considers expanding Colorado Air Quality Control Commission Regulation 7 applicability from sources in the 1-hour ozone non-attainment area (a.k.a. Denver metro area) to the 8-hour ozone non-attainment area that expands the 1-hour ozone non-attainment area to include eastern Adams and Arapahoe counties and to much of Larimer and Weld counties.

This could be accomplished by removing language in Regulation 7 that refers to the “1-hour non-attainment area” and replacing it with language that simply says “non-attainment area”.

This option may affect sources that are in the NAA (outside of the 1-hour area) subjecting them to previously adopted Control Technique Guidelines (CTGs) or general Reasonably Available Control Technology (RACT) requirements. See “Control Technique Guidelines in Regulation 7” Issue paper for further details.

This option may also clarify that in sections of regulation 7 that natural gas fired equipment is interpreted to include landfill gas and biomass fuel-fired equipment (see Regulation 7, Section XVII.B.).

Air Quality, Health And Welfare Benefit

This strategy is based on equity; applying those same requirements to sources in the new ozone NAA as sources in the 1-hour ozone NAA.

While health benefits are not quantified here, it is understood that reducing direct emissions of VOCs will reduce ozone and some air toxics. This will reduce the incidence of human health impacts caused by ozone, such as pulmonary, cardiovascular, respiratory, and nervous system disease. Because ozone damages crops, forests, and other natural plant life, all would benefit if emissions are reduced. This strategy may also reduce emissions of methane, which contributes to climate change.

Program Costs

Costs associated with requiring controls for source categories and/or individual facilities have not yet been determined.

Implementation and Administration

This strategy has the potential to significantly increase the number of regulated sources, and has reporting, permitting, and/or compliance assurance impacts to the APCD. Sources will need to be notified of this new requirement and will need a period of time to come into compliance with the Regulation 7 emission limits.