## Hawaii Department of Health Clean Air Branch Instructions for Greenhouse Gas Emission Reduction Plan

The following information is provided for your use in completing and submitting a Greenhouse Gas (GHG) emission reduction plan:

- 1. Submit the GHG emission reduction plan within twelve (12) months of June 30, 2014 in accordance with HAR §11-60.1-204(a).
- 2. You may submit a written request for an extension at least thirty (30) days prior to the deadline to submit your GHG reduction plan pursuant to HAR §11-60.1-204(a).
- 3. For each GHG emission reduction plan, evaluate measures for achieving a minimum facility-wide GHG emission cap that is 16% below baseline <u>actual</u> GHG emission levels as specified in HAR §11-60.1-204(c).
- 4. Provide the information for establishing a GHG emission cap in your GHG reduction plan as required by HAR §11-60.1-204(d).
- 5. Calendar year 2010 shall be used as the baseline year, unless you can provide information that another year or average of other years is more representative of normal operations.
- 6. An alternate baseline annual emission rate may be approved pursuant to HAR §11-60.1-204(d)(1)(A).
- 7. For newly permitted covered sources without a 2010 operating history, you shall make the best estimate of normal operations in accordance with HAR §11-60.1-204(d)(1)(B).
- 8. If the emission cap requiring a 16% emission reduction from the baseline year is deemed unattainable, you shall provide a GHG control assessment as part of your GHG reduction plan for an alternate proposed GHG emission cap.
- 9. The GHG control assessment, as referenced in HAR §11-60.1-204(d)(B)(2), is similar to a best available control technology (BACT) analysis. Additional details on the GHG control assessment are provided in HAR §11-60.1-204(d)(B)(3) to §11-60.1-204(d)(B)(5).
- 10. Guidance for performing a GHG BACT analysis is provided in EPA's "Prevention of Significant Deterioration and Title V Permitting Guidance for Greenhouse Gases" at: <a href="http://www.epa.gov/nsr/ghqdocs/qhqpermittingquidance.pdf">http://www.epa.gov/nsr/ghqdocs/qhqpermittingquidance.pdf</a>.
- 11. Information on measures that may be applied to reduce GHG emissions is provided in a technical support document on carbon pollution guidelines for existing power plants, "GHG Abatement Measures" at: <a href="http://www2.epa.gov/sites/production/files/2014-06/documents/20140602tsd-ghg-abatement-measures.pdf">http://www2.epa.gov/sites/production/files/2014-06/documents/20140602tsd-ghg-abatement-measures.pdf</a>.
- 12. Affected sources may propose to combine their facility-wide emission reductions among partnering facilities in accordance with HAR §11-60.1-204(d)(B)(6)(A).

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- 13. Pursuant to HAR §11-60.1-204(d)(B)(6)(B), biogenic CO<sub>2</sub> emissions will not be included when determining compliance with the facility-wide GHG emission cap.
- 14. The approved facility-wide GHG emission cap and associated monitoring, recordkeeping, and reporting provisions will be made part of your covered source permit in accordance with HAR §11-60.1-204(d)(B)(6)(C).
- 15. As specified in HAR §11-60.1-204(g), once a facility-wide GHG emission cap is established and incorporated into the covered source permit, the GHG emission reduction plan shall become part of the permit application process for renewals and any required modifications.
- 16. Affected sources are existing facilities or stationary sources constructed and operated by January 30, 2014.
- 17. Municipal waste combustion operations are exempt from the GHG emission reduction requirements.
- 18. Pursuant to criteria in HAR §11-60.1-204(i), municipal solid waste landfills with gas collection and control systems are conditionally exempt from the GHG emission reduction requirements.

Please mail completed GHG emission reduction plans with supporting information to:

Clean Air Branch Hawaii Department of Health 919 Ala Moana Boulevard, Room 203 Honolulu, Hawaii 96814