

US EPA ARCHIVE DOCUMENT

# Clean Air Investment Fund & Economic Incentive Program Guidance





# EIP Topics for Discussion



- EIP's for VOC toxics
- Consistency with existing SIP
- Environmental benefit
- Protocol approvals
- Class I protection



# Consistency with existing SIP

- To get an EIP approved, a State must show that the EIP is not going to interfere with existing plans for attainment
- Concern: EIP's shift emissions over time & space which does not occur in traditional control approaches
- Issue: What does a State need to do to prove that its EIP is consistent?
  - level of detail
  - how much certainty
  - statistical analysis



# Protocol approvals

- Should EIP's only be able to use EPA approved emission measurement protocols or should States have more flexibility?
  - For example, each State could approve protocols based on EPA evaluation criteria
- Does this depend on the sources involved?
  - source categories
  - pollutants
  - locations
- Does this depend on whether the EIP crosses jurisdictional boundaries?



# Class I protection

- Should EIP's provide special protection for Class I areas?
- What should this protection be?
- Is this dependent on the EIP?
  - location of sources
  - certainty of program
  - etc.