Ex post assessment of compliance cost

- EPA anticipated 72 NSPS (large and small) MWCs would exist in 2000, actual 8 large plants subject to NSPS in 2000

  - 4 new plants start operating
  - 7 plant closures
  - 3 plants reclassified from large to small
  - 9 plants reclassified from small to large
Ex post assessment of compliance cost (cont.)

- Plant closures and cancellations
  - 7 operating plants in 1995 closed during 1995-2000, plus another 12-15 MWCs that were “under construction” or “inactive” closed during 1990-2000
  - Of 6 plants listed as “on hold” and 20 plants listed as “planned” in 1995 inventory, only 1 achieved active status (Robbins: 1997-98)
Ex post assessment of compliance cost (data modifications)

- McKay Bay (FL) plant treated as two plants
  - Units 1 and 2 – treated as an existing MWC
  - Units 3 and 4 – treated as a second existing MWC
  - Rationale – Units had identical APCDs in 1991, but different APCDs in 2000

- SEMASS (MA) plant treated as two plants
  - Units 1 and 2 – treated as an existing MWC
  - Unit 3 – treated as an NSPS MWC
Ex post assessment of compliance cost (cont.)

- Methods of compliance (Specific technologies not mandated)
  - GCP/SD/FF/SNCR and carbon injection
  - GCP/SD/ESP/SNCR and carbon injection
- Compliance costs
  - Some MWCs with installed SD/FF or SD/ESP at the baseline and did not change APCDs (no costs incurred due to large MWC rule)
  - Example of positive APCD costs: ESP at baseline with SD/FF in 2000 – use FGD and FGP costs from EIA-767
Findings (preliminary)

- SO₂ and PM abatement costs
  - Using APCDs installed for 1991 inventory at 60 existing MWC plants, 42 plants had no ex ante costs
  - 26 new and existing plants had positive ex ante costs
  - 10 plants submitted usable FGD and FGP data

- See following table