







	GHG Tailoring Rule and Proposed NSPS	Cross State Air Pollution Rule (vacated)	Mercury & Air Toxics Standards	Clean Water Act 316(b)	New Jersey High Electric Demand Day	Renewable Portfolio Standards
Pollutant or target issue	CO_2 and other GHGs	•SO ₂ and NO _x annual caps •NO _x seasonal cap	Mercury, other Heavy Metals, and Acid Gases	Cooling water intake structures	Ozone formation from NO _x on hot days	Ensure a certain percentage of renewables
Relevant Dates	1/1/2011 – reporting, Mid-2013 – emission limits	•1/1/2012: Phase 1 •1/1/2014: Phase 2 •Vacated by DC Circuit Court	4/16/2015, extension possible under safety valve	2012 final rule 2015-2018	Phase 1 - current Phase 2 - May 1, 2015	various
Units impacted	All fossil units	All fossil units Primarily coal	Coal and oil, primarily coal	All existing units	Peaking units	All units
Standard	BACT case-by- case. CO2 – 1,000 lb/ MWh	Limited cap & trade. Use of FGD or DSI and SCR likely	MACT to be defined, likely FGD or DSI, ACI, fabric filter	BTA to be defined, likely not once thru cooling. Case-by-case	NO _x rate standard. Use of SCR and other controls likely	Mandated percentage of electricity sales from renewable
Impact on Units	Mostly fixed costs	Fixed Costs Variable Costs allowance prices	Mostly fixed costs, but also some VOM	Mostly fixed costs	Mostly fixed costs	Reduced net energy market revenues for non-RPS units

















































