Impacts of Nonattainment

- Restrictive permitting requirements for new projects or modified existing projects that do not apply to similar facilities in attainment areas. A new modeling program for ozone is being considered, and it is critical that permits not be delayed while any model issues are resolved.
- Projects cannot be built until new emissions are offset.
 - Offset prices in the Houston-Galveston-Brazoria Non-Attainment area are close to \$175,000/ton of NOx and the last VOC offset was \$275,000/ton
 - Offset prices in southern California nonattainment areas are approaching \$125,000/ton of NOx
- Causes stricter regulations to facilities currently existing in the Area.
 - In the Houston non-attainment area, existing facilities are subject to additional controls under the Highly Reactive VOC (HRVOC) rule, and combustion units, such as boilers and ethylene crackers, must install SCRs and low-NOx burners.
- Loss of federal highway and transit funding.
 - Federal projects must conform with State SIPs in order to proceed

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