

Office of Regulatory Management
Economic Review Form

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| Agency name | State Air Pollution Control Board |
| Virginia Administrative Code (VAC) Chapter citation(s) | 9VAC5-540 |
| VAC Chapter title(s) | Emergency Generator General Permit |
| Date this document prepared | February 15, 2023 |
| Regulatory Stage (including Issuance of Guidance Documents) | Periodic Review |

Table 1a: Costs and Benefits of the Proposed Changes (Primary Option)
Omitted pursuant to ORM Regulatory Economic Analysis Manual

Table 1b: Costs and Benefits under the Status Quo (No change to the regulation)
Omitted pursuant to ORM Regulatory Economic Analysis Manual

Table 1c: Costs and Benefits under Alternative Approach(es)
Omitted pursuant to ORM Regulatory Economic Analysis Manual

Impact on Local Partners

Table 2: Impact on Local Partners

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| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>Direct Costs: Fiscal estimates are indeterminate.</p> <p>Indirect Costs: Fiscal estimates are indeterminate.</p> <p>Direct Benefits: This regulation, which was established by legislative mandate, protects public health and welfare from air pollution while providing regulatory relief and encouraging the development of certain energy generators. No negative comment on the retention of this regulation was received.</p> <p>Indirect Benefits: There will likely be indirect benefits realized through the control of air pollution. The purpose of a general permit is to provide expedited, simplified permitting as mandated by state law; this provides a measure of regulatory relief.</p> |
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| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) Fiscal estimates are indeterminate. | (b) Fiscal estimates are indeterminate. |
| (3) Other Costs & Benefits (Non-Monetized) | <p>The primary advantage of this general permit is a streamlined process for permitting the operation of emergency generation sources during independent service operator (ISO) declared emergencies. This will ensure that adequate electricity is available to commercial facilities and the citizens of Virginia during critical times when electrical demands may be significant. More stringent emission limits are established for units operating in nonattainment areas to ensure that the air quality impacts are mitigated. The general permit encourages a more efficient permitting process for emergency generation sources and a reduction in the number of permits that need to be modified or changed due to additions or changes at the facilities that are operating emergency generation sources during ISO-declared emergencies.</p> <p>The general permit will reduce the staff time involved in the review of each case decision. In addition, this general permit will expedite the installation and operation of emergency generation sources during ISO-declared emergencies. The expedited process will also save considerable time and money for the source. The permit is designed to address both CI and SI engines; performance testing will verify the emissions thus ensuring the protection of health.</p> | |
| (4) Assistance | None. | |
| (5) Information Sources | Air Pollution Control Law of Virginia, fiscal impact analysis for HB2531 (Chapter 752, 2009 Acts of Assembly) | |

Impacts on Families

Table 3: Impact on Families

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| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>Direct Costs: Fiscal estimates are indeterminate.</p> <p>Indirect Costs: Fiscal estimates are indeterminate.</p> <p>Direct Benefits: This regulation, which was established by legislative mandate, protects public health and welfare from air pollution while providing regulatory relief and encouraging the development of certain energy generators.</p> <p>Indirect Benefits:</p> |
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| | There will likely be indirect benefits realized through the control of air pollution. The purpose of a general permit is to provide expedited, simplified permitting as mandated by state law. | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) Fiscal estimates are indeterminate. | (b) Fiscal estimates are indeterminate. |
| (3) Other Costs & Benefits (Non-Monetized) | The primary advantage associated with the general permit is a streamlined process for permitting the operation of emergency generation sources during ISO-declared emergencies. This will ensure that adequate electricity is available to commercial facilities and the citizens of Virginia during critical times when electrical demands may be significant. | |
| (4) Information Sources | Air Pollution Control Law of Virginia, fiscal impact analysis for HB2531 (Chapter 752, 2009 Acts of Assembly) | |

Impacts on Small Businesses

Table 4: Impact on Small Businesses

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| (1) Direct & Indirect Costs & Benefits (Monetized) | <p>Direct Costs: Fiscal estimates are indeterminate.</p> <p>Indirect Costs: Fiscal estimates are indeterminate.</p> <p>Direct Benefits: This regulation, which was established by legislative mandate, protects public health and welfare from air pollution while providing regulatory relief and encouraging the development of certain energy generators. No negative comment on the retention of this regulation was received.</p> <p>Indirect Benefits: There will likely be indirect benefits realized through the control of air pollution. The purpose of a general permit is to provide expedited, simplified permitting as mandated by state law; this provides a measure of regulatory relief.</p> | |
| (2) Present Monetized Values | Direct & Indirect Costs | Direct & Indirect Benefits |
| | (a) Fiscal estimates are indeterminate. | (b) Fiscal estimates are indeterminate. |

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| (3) Other Costs & Benefits (Non-Monetized) | <p>The primary advantage of this general permit is a streamlined process for permitting the operation of emergency generation sources during ISO-declared emergencies. This will ensure that adequate electricity is available to commercial facilities and citizens during critical times when electrical demands may be significant. The general permit encourages a more efficient permitting process for emergency generation sources and a reduction in the number of permits that need to be modified or changed due to additions or changes at the facilities that are operating emergency generation sources during ISO-declared emergencies.</p> <p>The general permit will reduce the staff time involved in the review of each case decision. It will expedite the installation and operation of emergency generation sources during ISO-declared emergencies. The expedited process will also save considerable time and money for the source. The permit is designed to address both CI and SI engines; performance testing will verify the emissions thus ensuring the protection of health.</p> |
| (4) Alternatives | |
| (5) Information Sources | Air Pollution Control Law of Virginia, fiscal impact analysis for HB2531 (Chapter 752, 2009 Acts of Assembly) |

Changes to Number of Regulatory Requirements

None.