



Environmental Committee

ITSC

Denver, CO Sept. 15, 2010

Barbara Patton – AT&T



Environmental Committee Overview Agenda

- Purpose
- Members
- Advocacy Efforts
- Benchmarking
- Other Issues



Environmental Committee Purpose

- To share ideas & approaches to environmental issues & regulations affecting our industry.
- To monitor and alert NTSP companies of new & proposed environmental laws and standards & their impact to our industry.
- To share new ideas & best practices surrounding green / environmental stewardship issues.

Environmental Committee Members

Barbara Patton, AT&T (Co-Chair)	Cathy Stafford, Sprint Nextel (Co-Chair)
Geoff Smith, AT&T	Eric Allgaier, Sprint Nextel
Daniel Gagne, Bell	Larry Bernson, Alcatel- Lucent
Ed Clement, CenturyLink	Gary Foltz, Cincinnati Bell
Brian Deters, Qwest	Robert Harding, Ericsson
Robin Sequin, Qwest	Kathy Brown, T-Mobile
Kathy Tobin, Verizon	Julianne Barnum, Verizon
Jeff McCook, Verizon Wireless	Stephanie Miller, Windstream

Advocacy Efforts

- EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) for Reciprocating Internal Combustion Engines
- Washington State Greenhouse Gas Reporting
- EPA PSD and Title V Greenhouse Gas Tailoring
- EPA NESHAP for Area Source Boiler
- Other (AZ NPDES, NC UST Operator Training)

NESHAP

- EPA finalized NESHAP rule for Reciprocating Internal Combustion Engines - Feb. 17, 2010
- Engines at Area Sources
 - Emergency engines at residential, commercial, or institutional facilities are not subject to the rule
 - Emergency engines may operate for 15 hours as part of a demand response program
 - Non-emergency engines > 300 HP required to meet numeric emission standard and use ULSD
 - Non-emergency engines \leq 300 HP required to comply with management practices

WA Greenhouse Gas Reporting

- WA Statutory requirements more stringent than Federal Reporting Rule
- Initial proposed rule would have required
 - By entity with entity thresholds triggers
 - Fleet emissions
 - Lower reporting threshold
- Statutory change based on public comments and EPA final GHG Mandatory Reporting Rule
- Revised proposed rule
 - Reporting by facility with facility threshold triggers
 - No fleet emission reporting, suppliers of motor vehicle fuel require to report instead
 - Retained lower reporting threshold (10,000 metric tons CO₂ equivalents/year)



Greenhouse Gas Tailoring Rule

- Rule proposed to mitigate unintended Title V and PSD permitting consequences of regulating GHG emissions under the tailpipe rule
- NTSP comments requested delay in tailpipe rule or implementation of measures to mitigate impact on state permitting agencies and regulated community
- Final rule
 - Provided a mechanism for states that can not immediately implement new requirements due to statutory structure
 - Phase 1 – 1/2/11 to 6/30/11 only sources triggering PSD or Title V for other pollutants need address GHG in permitting process
 - Phase 2 – 7/1/11 to 6/30/13 additionally sources with PTE to emit GHG at or above 100,000 tpy CO₂ equivalent
 - Phase 3 – Evaluate lower threshold and expanding GHG permitting requirements to smaller sources

Benchmarking

- Expanding NTSP benchmarking activities to include environmental metrics
- Open action item for committee members
 - Defining NOVs/Citations
 - Types of Compliance of Inspections
 - Other metrics



Other Issues

- Hazardous Waste
- Manhole Discharges
- Stormwater Discharges
- EPCRA Tenant Issues
- NAAAQS
 - Oxides of Nitrogen
 - Ozone