



Summary of Regulations and Orders Changing GPA Operations

STAKEHOLDER MEETING #2
GPA INTEGRATED RESOURCE PLAN 2021

March 2021

Main Drivers

- Consent Decree
 - EGU MACT
 - RICE MACT SIP
- State Implementation Plan
 - NAAQS – Non-attainment Areas

EGU MACT

- Electric Generating Unit Maximum Achievable Control Technology
- aka MATS (Mercury and Air Toxics Std)
 - Cabras 1 & 2, Tanguisson Power Plant
 - Tanguisson ceased operations April 2015

RICE MACT

- Reciprocating Internal Combustion Engine
Maximum Achievable Control Technology
 - Piti # 8 & 9
 - Cabras 3 & 4 went offline in August 2015 due to fire and explosion

Method of Compliance

- Consent Decree (CD) Negotiations with US EPA Region 9
 - Establish a path for GPA (and at the time Marianas Energy Corporation) to comply with EGU MACT and RICE MACT
 - Effective Date: April 20, 2020
- Civil Penalty
- Stipulated Compliance Requirements for GPA to follow

NAAQS and the SIP

- National Ambient Air Quality Standards
 - 2010 1-hour SO₂ Primary Standard
- April 9, 2019 – Cabras-Piti Area declared Non-Attainment for 2010 1-hour Primary SO₂

Method of Compliance

- State Implementation Plan
 - plan for complying with the federal Clean Air Act
 - Modeling that shows Guam is in compliance with the NAAQS

...Method of Compliance

- Conversion of Piti 8&9 to ULSD and installation of Oxidation Catalyst
- Retirement of Cabras 1 and 2
- Conditions that we can already meet:
 - Retirement of Cabras 3 and 4
 - Limit sulfur content of fuel for Piti #7 CT

Current

- Consent Decree
 - In talks with US EPA to re-negotiate some elements
- SIP
 - Updating SIP Attainment Demonstration (modeling) and Attainment Plan based on EPA comments