

# Energy Conservation Program: Energy Conservation Standards for Fluorescent Lamp Ballasts

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DOE/EA-1881

10/5/2011

## CHAPTER 16. ENVIRONMENTAL ASSESSMENT

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## CHAPTER 16. ENVIRONMENTAL ASSESSMENT

### 16.1 INTRODUCTION

This chapter describes potential environmental effects that may result from new energy conservation standards for fluorescent lamp ballasts (FLB or ballasts). The U.S. Department of Energy's (DOE's) adopted energy conservation standards are not site-specific, and would apply to all 50 states and U.S. territories. Therefore, none of the standards would impact land uses, cause any direct disturbance to the land, or directly affect biological resources in any one area.

For this final rule, all of the trial standard levels (TSLs) are expected to reduce energy use in comparison to the base case. These changes in energy use are the primary drivers in analyzing environmental effects. The estimates of energy savings that serve as inputs to the environmental impacts analysis can be found in the utility impact analysis in chapter 14 of this final rule technical support document (TSD).

The primary impact of the TSLs is on air emissions resulting from power plant operations. Therefore, much of this chapter describes the air emissions analysis, and the latter part of the chapter describes potential impacts to other environmental resources.

### 16.2 AIR EMISSIONS ANALYSIS

A primary focus of the environmental analysis is the impact on air emissions of new energy conservation standards for ballasts. The outcomes of the environmental analysis are largely driven by changes in power plant types and quantities of electricity generated under each of the alternatives. Changes in electricity generation are described in the utility impact analysis in chapter 14 of this final rule TSD.

#### 16.2.1 Air Emissions Descriptions

For each of the TSLs, DOE calculated total power-sector emissions based on output from the National Energy Modeling System-Building Technologies (NEMS-BT) model (see final rule TSD chapter 14 for a description of the model). This analysis considers three pollutants: sulfur dioxide (SO<sub>2</sub>), nitrogen oxides (NO<sub>x</sub>), and mercury (Hg). An air pollutant is any substance in the air that can cause harm to humans or the environment. Pollutants may be natural or man-made (*i.e.*, anthropogenic) and may take the form of solid particles (*i.e.*, particulates or particulate matter), liquid droplets, or gases.<sup>a</sup> This analysis also considers carbon dioxide (CO<sub>2</sub>).

***Sulfur Dioxide.*** Sulfur dioxide, or SO<sub>2</sub>, belongs to the family of sulfur oxide gases (SO<sub>x</sub>). These gases dissolve easily in water. Sulfur is prevalent in all raw materials, including crude oil, coal, and ore that contains common metals like aluminum, copper, zinc, lead, and iron. SO<sub>x</sub> gases are formed when fuel containing sulfur, such as coal and oil, is burned, and when gasoline is extracted from oil or metals are extracted from ore. SO<sub>2</sub> dissolves in water vapor to form acid, and interacts with other gases and particles in the air to form sulfates and other products that can be harmful to people and their environment.<sup>1</sup>

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<sup>a</sup> More information on air pollution characteristics and regulations is available on the U.S. Environmental Protection Agency (EPA) website at [www.epa.gov](http://www.epa.gov).

SO<sub>2</sub> emissions from affected electricity generating units (EGUs) are subject to nationwide and regional emissions cap-and-trade programs, and DOE has preliminarily determined that these programs create uncertainty about the standards' impact on SO<sub>2</sub> emissions. The attainment of the emissions caps is flexible among EGUs and is enforced through the use of emissions allowances and tradable permits. Under existing EPA regulations, any excess SO<sub>2</sub> emission allowances resulting from the lower electricity demand caused by the imposition of an efficiency standard could be used to permit offsetting increases in SO<sub>2</sub> emissions by any regulated EGU. However, if the standard resulted in a permanent increase in the quantity of unused emission allowances, there would be an overall reduction in SO<sub>2</sub> emissions from the standards. While there remains some uncertainty about the ultimate effects of efficiency standards on SO<sub>2</sub> emissions covered by the existing cap-and-trade system, the NEMS-BT modeling system that DOE uses to forecast emissions reductions currently indicates that no physical reductions in power sector emissions would occur for SO<sub>2</sub>.

**Nitrogen Oxides.** Nitrogen oxides, or NO<sub>x</sub>, is the generic term for a group of highly reactive gases, all of which contain nitrogen and oxygen in varying amounts. Many of the nitrogen oxides are colorless and odorless. However, one common pollutant, nitrogen dioxide (NO<sub>2</sub>), along with particles in the air, can often be seen as a reddish-brown layer over many urban areas. NO<sub>2</sub> is the specific form of NO<sub>x</sub> reported in this document. NO<sub>x</sub> is one of the main ingredients involved in the formation of ground-level ozone, which can trigger serious respiratory problems. It can contribute to the formation of acid rain, and can impair visibility in areas such as national parks. NO<sub>x</sub> also contributes to the formation of fine particles that can impair human health.<sup>2</sup>

Nitrogen oxides form when fossil fuel is burned at high temperatures, as in a combustion process. The primary manmade sources of NO<sub>x</sub> are motor vehicles; electric utilities; and other industrial, commercial, and residential sources that burn fossil fuels. NO<sub>x</sub> can also be formed naturally. Electric utilities account for about 22 percent of NO<sub>x</sub> emissions in the United States.<sup>3</sup>

The Clean Air Interstate Rule (CAIR) (discussed further in section 16.2.2) established a cap on NO<sub>x</sub> emissions in 28 eastern states and the District of Columbia. All these states and D.C. have elected to reduce their NO<sub>x</sub> emissions by participating in cap-and-trade programs for EGUs. Therefore, energy conservation standards for ballasts may have little or no physical effect on these emissions in the 28 eastern states and D.C. for the same reasons that they may have little or no physical effect on SO<sub>2</sub> emissions.

DOE is using NEMS-BT to estimate NO<sub>x</sub> emissions reductions from possible standards in the states where emissions were not capped under CAIR.

**Mercury.** Coal-fired power plants emit mercury, or Hg, found in coal during the burning process. While coal-fired power plants are the largest remaining source of human-generated Hg emissions in the United States, they contribute very little to the global Hg pool or to contamination of U.S. waters.<sup>4</sup> U.S. coal-fired power plants emit Hg in three different forms: oxidized Hg (likely to deposit within the United States); elemental Hg, which can travel thousands of miles before depositing to land and water; and Hg that is in particulate form. Atmospheric Hg is then deposited on land, lakes, rivers, and estuaries through rain, snow, and

dry deposition. Once there, it can transform into methylmercury and accumulate in fish tissue through bioaccumulation.

Americans are exposed to methylmercury primarily by eating contaminated fish. Because the developing fetus is the most sensitive to the toxic effects of methylmercury, women of childbearing age are regarded as the population of greatest concern. Children exposed to methylmercury before birth may be at increased risk of poor performance on neurobehavioral tasks, such as those measuring attention, fine motor function, language skills, visual-spatial abilities, and verbal memory.<sup>4</sup>

**Carbon Dioxide.** Carbon dioxide, or CO<sub>2</sub>, is not a criteria pollutant (see below), but it is of interest because of its classification as a greenhouse gas (GHG). GHGs trap the sun's radiation inside the Earth's atmosphere and either occur naturally in the atmosphere or result from human activities. Naturally occurring GHGs include water vapor, CO<sub>2</sub>, methane (CH<sub>4</sub>), nitrous oxide (N<sub>2</sub>O), and ozone (O<sub>3</sub>). Human activities, however, add to the levels of most of these naturally occurring gases. For example, CO<sub>2</sub> is emitted to the atmosphere when solid waste, fossil fuels (oil, natural gas, and coal), wood, and wood products are burned. In 2007, over 90 percent of anthropogenic CO<sub>2</sub> emissions resulted from burning fossil fuels.<sup>5</sup>

Concentrations of CO<sub>2</sub> in the atmosphere are naturally regulated by numerous processes, collectively known as the "carbon cycle." The movement of carbon between the atmosphere and the land and oceans is dominated by natural processes, such as plant photosynthesis. While these natural processes can absorb some of the anthropogenic CO<sub>2</sub> emissions produced each year, billions of metric tons (MT) are added to the atmosphere annually. In 2007, CO<sub>2</sub> emissions from electricity generation accounted for 39 percent of total U.S. GHG emissions.<sup>5</sup>

**Particulate Matter.** Particulate matter, or PM, also known as particle pollution, is a complex mixture of extremely small particles and liquid droplets. Particle pollution is made up of a number of components, including acids (such as nitrates and sulfates), organic chemicals, metals, and soil or dust particles.

PM impacts are of concern due to human exposures that can impact health. Particle pollution—especially fine particles—contains microscopic solids or liquid droplets that are so small that they can get deep into the lungs and cause serious health problems. Numerous scientific studies have linked particle pollution exposure to a variety of problems, including increased respiratory symptoms, such as irritation of the airways, coughing, or difficulty breathing, for example; decreased lung function; aggravated asthma; development of chronic bronchitis; irregular heartbeat; nonfatal heart attacks; and premature death in people with heart or lung disease.

DOE acknowledges that PM exposure can impact human health. Power plant emissions can have either direct or indirect impacts on PM. A portion of the pollutants emitted by a power plant are in the form of particulates as they leave the smoke stack. These are direct, or primary, PM emissions. However, the great majority of PM emissions associated with power plants are in the form of secondary sulfates, which are produced at a significant distance from power plants by complex atmospheric chemical reactions that often involve the gaseous (non-particulate) emissions of power plants, mainly SO<sub>2</sub> and NO<sub>x</sub>. The quantity of the secondary sulfates produced

is determined by a very complex set of factors, including the atmospheric quantities of SO<sub>2</sub> and NO<sub>x</sub>, and other atmospheric constituents and conditions. Because these highly complex chemical reactions produce PM comprised of different constituents from different sources, EPA does not distinguish direct PM emissions from power plants from the secondary sulfate particulates in its ambient air quality requirements, PM monitoring of ambient air quality, or PM emissions inventories. For these reasons, it is not currently possible to determine how the new standard impacts either direct or indirect PM emissions. Therefore, DOE did not assess the impact of these standards on PM emissions. Further, as described previously, it is uncertain whether efficiency standards will result in a net decrease in power plant emissions of SO<sub>2</sub> and NO<sub>x</sub>, since those pollutants are now largely regulated by cap-and-trade systems.

### 16.2.2 Air Quality Regulation

The Clean Air Act Amendments of 1990 list 188 toxic air pollutants that EPA is required to control.<sup>6</sup> EPA has set national air quality standards for six common pollutants (also referred to as “criteria” pollutants), two of which are SO<sub>2</sub> and NO<sub>x</sub>. Also, the Clean Air Act Amendments of 1990 gave EPA the authority to control acidification and to require operators of electric power plants to reduce emissions of SO<sub>2</sub> and NO<sub>x</sub>. Title IV of the 1990 amendments established a cap-and-trade program for SO<sub>2</sub> intended to help control acid rain.<sup>6</sup> This cap-and-trade program serves as a model for more recent programs with similar features.

In 2005, EPA issued the CAIR under sections 110 and 111 of the Clean Air Act (40 CFR parts 51, 96, and 97).<sup>b</sup> 70 FR 25162–25405 (May 12, 2005). CAIR limited emissions from 28 eastern states and D.C. by capping emissions and creating an allowance-based trading program. Although CAIR was remanded to EPA by the U.S. Court of Appeals for the District of Columbia Circuit (D.C. Circuit) (see *North Carolina v. EPA*, 550 F.3d 1176 (D.C. Cir. 2008)), it remained in effect temporarily, consistent with the D.C. Circuit’s earlier opinion in *North Carolina v. EPA*, 531 F.3d 896 (D.C. Cir. 2008). On July 6, 2010, EPA issued the Transport Rule proposal, a replacement for CAIR, 75 FR 45210 (Aug. 2, 2010), and on July 6, 2011, EPA issued the final Transport Rule, titled “Federal Implementation Plans: Interstate Transport of Fine Particulate Matter and Ozone and Correction of SIP Approvals,” but commonly referred to as the Cross-State Air Pollution Rule or the Transport Rule. 76 FR 48208 (Aug. 8, 2011).<sup>c</sup>

With respect to Hg emissions, in 2005, EPA issued the final rule titled “Standards of Performance for New and Existing Stationary Sources: Electric Steam Generating Units,” under sections 110 and 111 of the Clean Air Act (40 CFR parts 60, 63, 72, and 75). This rule, called the Clean Air Mercury Rule (CAMR), was closely related to the CAIR and established standards of performance for Hg emissions from new and existing coal-fired electric utility steam generating units. The CAMR regulated Hg emissions from coal-fired power plants.

On February 8, 2008, the U.S. Court of Appeals for the D.C. Circuit issued its decision in *State of New Jersey, et al. v. Environmental Protection Agency*, 517 F.3d 574, 583 (D.C. Cir. 2008), in which the Court, among other actions, vacated the CAMR referenced above.

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<sup>b</sup> See [www.epa.gov/cleanairinterstaterule/](http://www.epa.gov/cleanairinterstaterule/).

<sup>c</sup> DOE’s discussion and conclusions about NO<sub>x</sub> emissions assume the implementation of CAIR and associated trading schemes and do not take into account the recently issued Transport Rule. In future rulemakings, DOE will adjust its relevant models to assume the implementation of the Transport Rule.

### 16.2.3 Global Climate Change

Climate change has evolved into a matter of global concern because it is expected to have widespread, adverse effects on natural resources and systems. A growing body of evidence points to anthropogenic sources of GHGs, such as CO<sub>2</sub>, as major contributors to climate change. Because this final rule will likely decrease CO<sub>2</sub> emission rates from the fossil fuel sector in the United States, DOE here examines the impacts and causes of climate change and then the potential impact of the rule on CO<sub>2</sub> emissions and global warming.

***Impacts of Climate Change on the Environment.*** Climate is usually defined as the average weather, over a period ranging from months to many years. Climate change refers to a change in the state of the climate, which is identifiable through changes in the mean and/or the variability of its properties (*e.g.*, temperature or precipitation) over an extended period, typically decades or longer.<sup>7</sup>

The World Meteorological Organization and United Nations Environment Programme (UNEP) established the Intergovernmental Panel on Climate Change (IPCC) to provide an objective source of information about climate change. According to the IPCC Fourth Assessment Report (IPCC Report), published in 2007, climate change is consistent with observed changes to the world's natural systems; the IPCC expects these changes to continue.

Changes that are consistent with warming include warming of the world's oceans to a depth of 3,000 meters; global average sea level rise at an average rate of 1.8 mm per year from 1961 to 2003; loss of annual average Arctic sea ice at a rate of 2.7 percent per decade; changes in wind patterns that affect extra-tropical storm tracks and temperature patterns; increases in intense precipitation in some parts of the world, as well as increased drought and more frequent heat waves in many locations worldwide; and numerous ecological changes.

Looking forward, the IPCC describes continued global warming of about 0.2 °C per decade for the next two decades under a wide range of emission scenarios for CO<sub>2</sub>, other GHGs, and aerosols. After that period, the rate of increase is less certain. The IPCC Report describes increases in average global temperatures of about 1.1 to 6.4 °C at the end of the century relative to today. These increases vary depending on the model and emissions scenarios.

The IPCC Report describes incremental impacts associated with the rise in temperature. At ranges of incremental increases to the global average temperature, IPCC reports, with either high or very high confidence, that there is likely to be an increasing degree of impacts such as coral reef bleaching, loss of wildlife habitat, loss to specific ecosystems, and negative yield impacts for major cereal crops in the tropics, but also projects that there likely will be some beneficial impacts on crop yields in temperate regions.

***Causes of Climate Change.*** The IPCC Report states that the world has warmed by about 0.74 °C in the last 100 years. The report finds that most of the temperature increase since the mid-20th century is very likely due to the increase in anthropogenic concentrations of CO<sub>2</sub> and other long-lived GHGs such as methane and NO<sub>x</sub> in the atmosphere, rather than from natural causes.

Increasing the CO<sub>2</sub> concentration partially blocks the Earth's re-radiation of captured solar energy in the infrared band, inhibits the radiant cooling of the Earth, and thereby alters the energy balance of the planet, which gradually increases its average temperature. The IPCC Report estimates that CO<sub>2</sub> currently makes up about 77 percent of the total CO<sub>2</sub>-equivalent<sup>d</sup> global warming potential in GHGs emitted from human activities, with the vast majority (74 percent) of the CO<sub>2</sub> attributable to fossil fuel use.<sup>8</sup> For the future, the IPCC Report describes a wide range of GHG emissions scenarios, but under each scenario CO<sub>2</sub> would continue to comprise above 70 percent of the total global warming potential.

***Stabilization of CO<sub>2</sub> Concentrations.*** Unlike many traditional air pollutants, CO<sub>2</sub> mixes thoroughly in the entire atmosphere and is long-lived. The residence time of CO<sub>2</sub> in the atmosphere is long compared to the emission processes. Therefore, the global cumulative emissions of CO<sub>2</sub> over long periods determine CO<sub>2</sub> concentrations because it takes hundreds of years for natural processes to remove the CO<sub>2</sub>. Globally, 49 billion MT of CO<sub>2</sub>-equivalent of anthropogenic GHGs are emitted every year. Of this annual total, fossil fuels contribute about 29 billion MT of CO<sub>2</sub>.<sup>9,e</sup>

Researchers have focused on considering atmospheric CO<sub>2</sub> concentrations that likely will result in some level of global climate stabilization, and the emission rates associated with achieving the “stabilizing” concentrations by particular dates. They associate these stabilized CO<sub>2</sub> concentrations with temperature increases that plateau in a defined range. For example, at the low end, the IPCC Report scenarios target a CO<sub>2</sub> stabilized concentrations range between 350 and 400 ppm (essentially today's value)—because of climate inertia, concentrations in this low-end range would still result in temperatures projected to increase 2.0 to 2.4 °C above pre-industrial levels<sup>10</sup> (about 1.3 to 1.7 °C above today's levels). To achieve concentrations between 350 and 400 ppm, the IPCC scenarios present that there would have to be a rapid downward trend in total annual global emissions of GHGs to levels that are 50 to 85 percent below today's annual emission rates by no later than 2050. Since it is assumed that there would continue to be growth in global population and substantial increases in economic production, the scenarios identify required reductions in GHG emissions intensity (emissions per unit of output) of more than 90 percent. However, even at these rates, the scenarios project some warming and some climate change due to already accumulated CO<sub>2</sub> and GHGs in the atmosphere.<sup>10</sup>

***The Beneficial Impact of the Rule on CO<sub>2</sub> Emissions.*** It is anticipated that the rule will reduce energy-related CO<sub>2</sub> emissions, particularly those associated with energy use in buildings. The U.S. Energy Information Administration (EIA) reports in its *2010 Annual Energy Outlook (AEO2010)*<sup>11</sup> that U.S. annual energy-related emissions of CO<sub>2</sub> in 2007 were about 6.0 billion MT, of which 1.2 billion tons were attributed to the residential buildings sector (including related energy-using products such as residential furnaces and central air conditioner products.) Most of the GHG emissions attributed to residential buildings are emitted from fossil-fuel fired power

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<sup>d</sup> GHGs differ in their warming influence (radiative forcing) on a global climate system due to their different radiative properties and lifetimes in the atmosphere. These warming influences may be expressed through a common metric based on the radiative forcing of CO<sub>2</sub>, *i.e.*, CO<sub>2</sub>-equivalent. CO<sub>2</sub>-equivalent emission is the amount of CO<sub>2</sub> emission that would cause the same time integrated radiative forcing, over a given time horizon, as an emitted amount of other long-lived GHG or mixture of GHGs.

<sup>e</sup> Other non-fossil fuel contributors include CO<sub>2</sub> emissions from deforestation and decay from agriculture biomass; agricultural and industrial emissions of methane; and emissions of nitrous oxide and fluorocarbons.



plants that generate electricity used in this sector. In the *AEO2010* Reference Case, EIA projected that annual energy-related CO<sub>2</sub> emissions would grow from 5.7 billion MT in 2015 to 6.3 billion MT in 2035, an increase of 10 percent (see *AEO2010*), while residential emissions would grow to from 1.2 billion MT to 1.3 billion MT, an increase of 12 percent.

The estimated cumulative CO<sub>2</sub> emission reductions from the adopted FLB conservation standards (shown as a range of alternative TSLs) during the 30-year analysis period are indicated in Table 16.2.1. The estimated CO<sub>2</sub> emission reductions from electricity generation are calculated using the NEMS-BT model.

**Table 16.2.1 Reduction in Cumulative Energy-Related Emissions of CO<sub>2</sub> from 2014 through 2043 from Ballasts Energy Conservation Standards**

Trial Standard Level	Cumulative Reduction in CO <sub>2</sub> Emissions (2014 through 2043) <i>million MT</i>	
	Existing Technologies, Shift	Emerging Technologies, Roll-up
1	64	13
2	76	20
3A	106	27
3B	106	29

***The Incremental Impact of the Rule on Climate Change.*** It is difficult to correlate specific emission rates with atmospheric concentrations of CO<sub>2</sub> and specific atmospheric concentrations with future temperatures because the IPCC Report describes a clear lag in the climate system between any given concentration of CO<sub>2</sub> (even if maintained for long periods) and the subsequent average worldwide and regional temperature, precipitation, and extreme weather regimes. For example, a major determinant of climate response is “equilibrium climate sensitivity,” a measure of the climate system response to sustained radioactive forcing. It is defined as the global average surface warming following a doubling of CO<sub>2</sub> concentrations. The IPCC Report describes its estimated, numeric value as about 3 °C, but the likely range of that value is 2 to 4.5 °C, with cloud feedbacks being the largest source of uncertainty. Further, as illustrated above, the IPCC Report scenarios for stabilization rates are presented in terms of a range of concentrations, which then correlates to a range of temperature changes. Thus, climate sensitivity is a key uncertainty for CO<sub>2</sub> mitigation scenarios that aim to meet specific temperature levels.

Because of how complex global climate systems are, it is difficult to know when and to what extent particular CO<sub>2</sub> emissions reductions will impact global warming. However, as Table 16.2.1 indicates, the rule is expected to reduce CO<sub>2</sub> emissions associated with energy use in buildings.

#### **16.2.4 Analytical Methods for Air Emissions**

Coal-fired electric generation is the single largest source of electricity in the United States. Because the mix of coals used significantly affects the emissions produced, the model includes a detailed representation of coal supply. The model considers the rank of the coal as well as the sulfur contents of the fuel used when determining optimal dispatch.<sup>12</sup>

Within the NEMS-BT model, planning options for achieving emissions restrictions in the Clean Air Act Amendments include installing pollution control equipment on existing power plants and building new power plants with low emission rates. These methods for reducing emissions are compared to dispatching options such as fuel switching and allowance trading. Environmental regulations also affect capacity expansion decisions. For instance, new plants are not allocated SO<sub>2</sub> emissions allowances according to the Clean Air Act Amendments. Consequently, the decision to build a particular capacity type must consider the cost (if any) of obtaining sufficient allowances. This could involve purchasing allowances or over complying at an existing unit.

DOE's analysis assumes the presence of nationwide emission caps on SO<sub>2</sub> and caps on NO<sub>x</sub> emissions in the 28 states covered by the CAIR.<sup>f</sup> The NEMS-BT modeling system that DOE uses to forecast emission reductions currently indicates that no physical reductions in power sector emissions would occur for SO<sub>2</sub>. However, in contrast to the NEMS-BT modeling forecasts that SO<sub>2</sub> emissions will remain at the cap, during the years 2007 and 2008, SO<sub>2</sub> emissions were below the trading cap. The difference between the emissions levels that NEMS-BT forecasts and those that EPA forecasts is an indicator of the uncertainties associated with long-range energy sector forecasts. Because of such uncertainties, DOE is unable to estimate the economic and physical benefit from SO<sub>2</sub> emissions reductions at this time.

With respect to Hg, in the absence of CAMR or other trading program, a DOE standard would likely reduce Hg emissions and DOE uses NEMS-BT to estimate these emission reductions. However, DOE continues to review the impact of rules that reduce energy use on Hg emissions, and may revise its assessment of Hg emission reductions in future rulemakings.

As noted in chapter 14, NEMS-BT model forecasts end in year 2035. Rather than extrapolate beyond this year, DOE assumes that emissions impacts beyond 2035 are equal to the impacts in 2035.

### 16.2.5 Effects on Power Plant Emissions

Table 16.2.2 shows NEMS-BT Reference Case power plant emissions in selected years and Table 16.2.3 show the estimated changes in power plant emissions of CO<sub>2</sub>, NO<sub>x</sub>, and Hg in selected years for each of the TSLs. Values for CO<sub>2</sub> are given in metric tons, while values for NO<sub>x</sub> and Hg are given in short tons.

**Table 16.2.2 Power Sector Emissions Forecast, Reference Case**

<b>NEMS-BT Results</b>	<b>2010</b>	<b>2015</b>	<b>2020</b>	<b>2025</b>	<b>2030</b>	<b>2035</b>
CO <sub>2</sub> (million metric tons)	2,218	2,279	2,344	2,433	2,538	2,635
NO <sub>x</sub> (thousand tons)	2.2	2.1	2.0	2.0	2.1	2.1
Mercury (tons)	40.6	30.7	30.4	30.3	30.8	30.6

<sup>f</sup> As stated above, EPA issued the final Transport Rule on July 6, 2011. The Transport Rule replaces CAIR. DOE's discussion and conclusions about NO<sub>x</sub> emissions assume the implementation of CAIR and associated trading schemes and do not take into account the very recently issued Transport Rule. In future rulemakings, DOE will adjust its relevant models to assume the implementation of the Transport Rule.

**Table 16.2.3 Power Sector Emissions Impacts Forecasts for Ballast TSLs, Existing Technologies, Shift Scenario\***

NEMS-BT Results:	Difference from Reference Case						
	2015	2020	2025	2030	2035	Extrapolation	
						2040	2043
<b>Trial Standard Level 1</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.41	-1.30	-2.03	-2.58	-2.96	-2.96	-2.96
NO <sub>x</sub> (Thousand tons/year)	-0.23	-0.68	-0.93	-1.00	-0.87	-0.87	-0.87
Hg (tons/year)	-0.01	-0.04	-0.05	-0.04	-0.02	-0.02	-0.02
<b>Trial Standard Level 2</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.49	-1.56	-2.42	-3.08	-3.54	-3.54	-3.54
NO <sub>x</sub> (Thousand tons/year)	-0.28	-0.81	-1.11	-1.19	-1.04	-1.04	-1.04
Hg (tons/year)	-0.02	-0.05	-0.06	-0.05	-0.02	-0.02	-0.02
<b>Trial Standard Level 3a</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.68	-2.17	-3.37	-4.30	-4.93	-4.93	-4.93
NO <sub>x</sub> (Thousand tons/year)	-0.38	-1.12	-1.55	-1.66	-1.45	-1.45	-1.45
Hg (tons/year)	-0.02	-0.06	-0.08	-0.07	-0.03	-0.03	-0.03
<b>Trial Standard Level 3b</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.68	-2.17	-3.37	-4.30	-4.93	-4.93	-4.93
NO <sub>x</sub> (Thousand tons/year)	-0.38	-1.13	-1.55	-1.66	-1.45	-1.45	-1.45
Hg (tons/year)	-0.02	-0.06	-0.08	-0.07	-0.03	-0.03	-0.03

\* CO<sub>2</sub> results are in metric tons, NO<sub>x</sub> and Hg results are in short tons.

**Table 16.2.4 Power Sector Emissions Impacts Forecasts for Ballast TSLs, Emerging Technologies, Roll Scenario**

NEMS-BT Results:	Difference from Reference Case						
	2015	2020	2025	2030	2035	Extrapolation	
						2040	2043
<b>Trial Standard Level 1</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.35	-0.92	-1.02	-0.66	0.16	0.16	0.16
NO <sub>x</sub> (Thousand tons/year)	-0.03	-0.11	-0.23	-0.38	-0.57	-0.57	-0.57
Hg (tons/year)	-0.01	-0.02	-0.02	-0.01	0.01	0.01	0.01
<b>Trial Standard Level 2</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.56	-1.46	-1.62	-1.05	0.26	0.26	0.26
NO <sub>x</sub> (Thousand tons/year)	-0.04	-0.18	-0.37	-0.61	-0.91	-0.91	-0.91
Hg (tons/year)	-0.01	-0.03	-0.03	-0.02	0.01	0.01	0.01
<b>Trial Standard Level 3a</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.78	-2.01	-2.23	-1.44	0.36	0.36	0.36
NO <sub>x</sub> (Thousand tons/year)	-0.05	-0.24	-0.50	-0.84	-1.24	-1.24	-1.24
Hg (tons/year)	-0.01	-0.04	-0.04	-0.02	0.01	0.01	0.01
<b>Trial Standard Level 3b</b>							
CO <sub>2</sub> (Million metric tons/year)	-0.82	-2.11	-2.34	-1.51	0.38	0.38	0.38
NO <sub>x</sub> (Thousand tons/year)	-0.06	-0.26	-0.53	-0.88	-1.31	-1.31	-1.31
Hg (tons/year)	-0.02	-0.04	-0.04	-0.02	0.01	0.01	0.01

### 16.2.6 Effects on Upstream Fuel-Cycle Emissions

Upstream fuel-cycle emissions refer to the emissions associated with the amount of energy used in the upstream production and downstream use of electricity, including energy used at the power plant.<sup>13</sup> Upstream processes include the mining of coal or extraction of natural gas, physical preparatory and cleaning processes, and transportation to the power plant. NEMS-BT does a thorough accounting of emissions at the power plant due to downstream energy use, but

does not account for upstream emissions (*i.e.*, emissions from energy losses during coal and natural gas production). Thus, this analysis reports only power plant emissions.

However, previous DOE environmental assessment documents have developed approximate estimates of effects on upstream fuel-cycle emissions. These emissions factors provide a sense of the possible magnitude of upstream effects. These upstream emissions would be in addition to emissions from direct combustion.

Relative to the entire fuel cycle, estimates based on the work of Dr. Mark DeLuchi, and reported in earlier DOE environmental assessment documents, find that an amount approximately equal to 8 percent, by mass, of emissions (including SO<sub>2</sub>) from coal production are due to mining, preparation that includes cleaning the coal, and transportation from the mine to the power plant.<sup>14</sup> Transportation emissions include emissions from the fuel used by the mode of transportation that moves the coal from the mine to the power plant. In addition, based on Dr. DeLuchi's work, DOE estimated that approximately 14 percent of emissions from natural gas production result from upstream processes.

Emission factor estimates and corresponding percentages of contributions of upstream emissions from coal and natural gas production, relative to power plant emissions, are shown in Table 16.2.5 for CO<sub>2</sub> and NO<sub>x</sub>. The percentages provide a means to estimate upstream emission savings based on changes in emissions from power plants. This approach does not address Hg emissions.

**Table 16.2.5 Estimated Upstream Emissions of Air Pollutants as a Percentage of Direct Power Plant Combustion Emissions**

Pollutant	Percent of Coal Combustion Emissions	Percent of Natural Gas Combustion Emissions
CO <sub>2</sub>	2.7	11.9
NO <sub>x</sub>	5.8	40

### **16.3 WETLAND, ENDANGERED AND THREATENED SPECIES, AND CULTURAL RESOURCES**

Because ballasts are not water-consuming products, more efficient products would not reduce the amount of water discharged into the waste stream. As a result, the adopted energy conservation standards do not have the effect of improving the quality of wetlands or the threatened or endangered species that reside in these wetlands. This action is also not expected to impact cultural resources such as historical or archaeological sites.

### **16.4 SOCIOECONOMIC IMPACTS**

DOE's analysis has shown that, for the average consumer, the increase in the first cost of purchasing more efficient ballasts at the new standard levels is, in most cases, completely offset by a reduction in the life-cycle cost (LCC) of owning more efficient products. In other words, despite the increase in the first cost, the consumer will pay less in operating costs over the life of the product. The complete LCC analysis and its conclusions are presented in chapter 8 of the final rule TSD.

For subgroups of low-income and other consumers who purchase regulated ballasts, DOE determined that the average LCC impact of the standards is similar to that for the full sample of consumers. Therefore, DOE concludes that the adopted standards would have no significant adverse socioeconomic impact. For a complete discussion on the LCC impacts on consumer subgroups, see chapter 12 of the final rule TSD.

## **16.5 ENVIRONMENTAL JUSTICE IMPACTS**

In view of Executive Order 12898 of February 11, 1994, “Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations,” DOE examined the effect of the energy conservation standards on low-income households. As described in the LCC subgroup analysis in chapter 11 of the final rule TSD, DOE found that there were no disproportionately high and adverse human health or environmental effects on low-income populations that would result from the adopted energy conservation standards.

## **16.6 NOISE AND AESTHETICS**

Improvements in efficiency of ballasts are expected to result from changes in the choice of design features. These changes are described in chapter 5 of the final rule TSD. These design changes are not expected to change noise levels in comparison to products in today’s market. Ballasts that are currently manufactured in the existing market that already meet new standard efficiency levels are no louder than less efficient products. Changes to product design to improve the efficiency levels are not expected to adversely affect the aesthetics of the products.

## **16.7 SUMMARY OF ENVIRONMENTAL IMPACTS**

Table 16.7.1 summarizes the estimated emissions impacts for each of the TSLs for ballasts under both low and high shipments scenarios. It shows cumulative changes in emissions for CO<sub>2</sub>, NO<sub>x</sub>, and Hg for 2015 through 2044 for each of the ballast TSLs. Cumulative CO<sub>2</sub>, NO<sub>x</sub>, and Hg emissions are reduced compared to the reference case for all TSLs.

Upstream fuel cycle emissions of CO<sub>2</sub> and NO<sub>x</sub> are described but not quantified in section 16.2.5. The text describes potential reductions in fuel cycle emissions as percentage of decreases in power plant emissions. This approach suggests that upstream fuel cycle emissions would decrease and provides a sense of the magnitude of effects; however, DOE does not report actual estimates of the effects.

For subgroups of low-income and other consumers that purchase ballasts, DOE determined that the average LCC impact of the standards is similar to that for the full sample of consumers. Therefore, DOE concludes that the adopted new standards would have no significant adverse socioeconomic impact.

No impacts are anticipated in the areas of environmental justice, wetlands, endangered and threatened species, cultural resources, or noise and aesthetics.

**Table 16.7.1 Cumulative Emissions Reductions Under Ballast TSLs\***

Trial Standard Level	Cumulative Reduction in Emissions (2014 through 2043)					
	Existing Technologies, Shift			Emerging Technologies, Roll-Up		
	CO <sub>2</sub> <i>million-MT</i>	NO <sub>x</sub> <i>thousand tons</i>	Hg <i>tons</i>	CO <sub>2</sub> <i>million-MT</i>	NO <sub>x</sub> <i>thousand tons</i>	Hg <i>tons</i>
1	64	23	0.88	13	10	0.18
2	76	28	1.05	20	16	0.29
3A	106	39	1.47	27	22	0.40
3B	106	39	1.47	29	23	0.42

\* Values for CO<sub>2</sub> are in metric tons; values for NO<sub>x</sub> and Hg are in short tons.

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