

Senator Jessica Bell  
District 33  
SB 2237

SB 2237 adds "coal-fueled electric generating units" to the existing statute limiting the stringency of state regulations to no more than what federal rules require. This addition is simply to make abundantly clear both our coal conversion units and our coal-fired electric generating units qualify under this chapter for protection from additional regulations. The Governor has directed the agencies to "identify ways to challenge federal overreach where necessary", and this bill and the next both position us well to assist in that goal. This change is needed because EPA defines coal conversion units and coal-fueled electric generating units differently. For example, EPA has published emission factors for many different kinds of sources, and it has separate emission factors for coal conversion factors. In the document explaining that "coal conversion" emission factor, EPA states that, "[i]n addition to its direct use for combustion, coal can be converted to organic gases and liquids ....," confirming EPA views combustion and conversion as different things (<https://www.epa.gov/air-emissions-factors-and-quantification/ap-42-fifth-edition-volume-i-chapter-11-mineral-products-0>). The New Source Review rule also lists "[f]uel conversion plants" separate from "[f]ossil fuel-fired steam electric plants," again suggesting the two are distinct. I also think there is significant value in making this addition, and look to this committee to support in that effort.