TABLE-1: A COMPARISON OF NSR APPLICABILITY OPTIONS

	.....SCENARIOS.....		A1	A2	P1	P2	A1 TO P2 TEST EPA's Previous NSR Test	A1 TO A2 TEST EPA's new NSR Test not considering Demand Growth	P1 TO P2 TEST New Jersey's current rule	P1 TO A2 TEST EPA's new NSR Test considering Demand Growth
(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
CASE-1	A2-A1 = P2-P1	P1<P2	300	500	800	1000	700	200	200	-300
CASE-2	A2-A1 > P2-P1	P1=P2	300	500	800	800	500	200	0	-300
CASE-3	A2-A1 < P2-P1	P1<P2	300	400	800	1000	700	100	200	-400
CASE-4	A2-A1> P2-P1	P1<P2	300	500	800	900	600	200	100	-300
CASE-5	A2-A1> P2-P1	P1 >P2	300	500	900	700	400	200	-200	-400
CASE-6	A2-A1> P2-P1	P1 >P2	300	600	800	600	300	300	-200	-200
CASE-7	A2-A1= P2-P1	P1<P2	200	600	400	800	600	400	400	200
CASE-8	A2-A1> P2-P1	P1<P2	200	700	500	800	600	500	300	200
CASE-9	A2-A1< P2-P1	P1<P2	200	500	300	800	600	300	500	200
CASE-10	A2-A1< P2-P1	A1=A2	200	200	300	400	200	0	100	-100

A1 = actual emissions before change

A2 = actual emissions after change

P1 = potential to emit before change

P2 = potential to emit after change

CONCLUSIONS:

a. Compare column (J) and (K). New Jersey Emission Offset Rule applicability test would trigger NSR review in cases where the EPA December 31, 2002 NSR test would not.(CASES 1, 3,4 and 10)

b. When A1=A2 (no increase in actual emissions), EPA assumes there is no modification and NSR is not applicable. However, the Emission Offset Rule would find that source was subject to NSR based on an increase in the potential to emit. This case is relevant because EPA's demand exclusion allows emission increases up to the potential to emit.(CASE-10)

c. When P1=P2 (no increase in potential emissions), both NJ rule (Column J) and EPA rule (Column K) would not trigger NSR applicability. (CASE 2)

d. When P1>P2 (decrease in potential emissions), both NJ rule (Column J) and EPA rule (Column K) would not trigger NSR applicability. (CASES 5 & 6)

Note: Other provisions of the New Jersey do not allow reductions in potential emissions to be used in the calculation of net emission increase.
Only reductions in the actual emissions can reduce a net emission increase.

e. For cases 7,8 and 9 where there are greater emisssion increases than other cases, both EPA and New Jersey would trigger NSR, but New Jersey by a greater amount.

f. There is no case where the EPA rule is more stringent than the New Jersey rule.