



November 23, 2010

Jill Inahara
DEQ, Air Quality
811 S.W. 6th Ave.,
Portland, Oregon 97204

Re: Comments on Proposed Greenhouse Gas and Particulate Pollution Rules to Align with Federal Regulations

Contrary to the DEQ News Release on the above referenced matter the proposed amendments go beyond what is required to "...update state regulations for fine particle pollution and greenhouse gases in order to align them with new federal regulations". Also contrary to the DEQ News Release that "...the amendment will not affect the stringency of Oregon's air quality permitting program..." the amendment will affect the stringency of its program.

Any amendments to the DEQ program should bring the DEQ program closer to EPA's Regulations. For instance DEQ's use of a fixed baseline instead of the EPA's netting basis to compute Significant Emission Rate Should not be allowed to continue. DEQ needs to revise its Prevention of Significant Deterioration program rules to align it with EPA's regulations. Similarly, the DEQ's reporting threshold for Greenhouse Gas should be increased to match the EPA's threshold. There is no reasonable explanation for the DEQ to continue to diverge from the EPA. Allowing this to continue increases the costs and complexity of the program, without any defined benefits.

In the DEQ proposed rules a source would need to establish a ratio between its PM 2.5 and PM 10 emissions through testing only. Sources should have the option of using the ratio based upon the Particle Size Category by AP – 42 section. If modeling analysis is required for an area, having PM 2.5 default to PM 10 will result in compounding conservative worst case conditions.

Given the statement "DEQ's proposed Class II and Class III Significant Impact Level (SIL) are lower than EPA's values because DEQ established lower levels in the early 1990's for PM10 due to significant air quality problems in the Medford area". However, the DEQ has concluded in its December 10, 2004 State Implementation plan for PM10 in the Medford Ashland Air Quality Maintenance Area that "The analysis demonstrates that no new emission reduction strategies are

needed to maintain compliance.” There is no reason for the DEQ to impose stricter SIL’s than what the EPA requires.

Instead of trying to enforce new lower standards for the most difficult, expensive and inaccurate testing of PM 2.5. The DEQ should be looking at standards for total PM matter based on testing with an allowance for use of existing tables of site developed ratios to establish particle size gradation. They should also recognize that geography plays a large role in air pollution problems and efforts should be made to reduce pollution at those specific times when the air shed becomes stagnant.

Sincerely,

Knife River Materials,

A handwritten signature in black ink, appearing to read "Th. S. Gruszczenski". The signature is written in a cursive, flowing style.

Thomas S. Gruszczenski, PE
Aggregate Resource Manager