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Oregon Department of Environmental Quality
Program Operations
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Attention: Ms. Jill Inahara

Subject: *Comments For New Source Review Particulate Matter and Greenhouse Gas Permitting Requirements and Other Permitting Rule Updates*

Dear Ms Inahara:

After attending the public hearing in Medford, Oregon on November 23rd, 2010 with respect to the NSR/PSD and greenhouses gases (GHG), Environmental Technical Services, Inc. offers the following comments on the Proposed Rulemaking. We are an air quality emission testing and consulting firm operating in Central Point, Oregon that serves industrial wood products manufacturing clients in California, Georgia, Montana, South Carolina, Oregon, Washington, and Wisconsin.

Comment #1
With respect to the issue of Particulate Matter 2.5 Micron Diameters or Less ($PM_{2.5}$), it appears that permanent rule making is under way and definite without allowing source test methods to develop so that industry sources can quantify existing ($PM_{2.5}$) emissions from sources at their respective facilities.

This is potentially catastrophic mistake, and to date, no acceptable test method exists that allows a wood products source that is saturated to test and measure ($PM_{2.5}$) emissions from a wet scrubber or wet-ESP control device that is currently controlling emissions from their manufacturing facility.

While a method exists to quantify ($PM_{2.5}$) from non-saturated source (i.e. dry-esp from a hogged fuel boiler), data from this test method EPA 201A and its derivatives are only accurate plus or minus 50% of the mean value. From a pure statistics point of view, this methodology leaves a lot to be desired.

With the above facts stated, it appears that the need to regulate ($PM_{2.5}$) emissions subscribes to the statement, "What facts won't support, conviction will carry". It appears that common sense (i.e. the quantification and collection of data) is need before the rulemaking process can begin.

Comment #2

Netting basis in Oregon ACDP or Title-V Operating Permits have historically been dated around the 1978 and/or 1978 calender year(s). During the public hearing, it was stated that PM_{10} baselines could have the potential to become all $PM_{2.5}$ baseline emissions for the 1978 and or 1978 calendar years. Four different options were presented for ($PM_{2.5}$) / GHG NSR/PSD.

Historically for forest products sources, 1978 and/or 1978 calendar year would probably be the preferred method Netting Basis. However, one issue that I am quite concerned about is assuming that PM_{10} emissions are $PM_{2.5}$ emissions and vice versa.

Let's examine the permitting and regulatory activity (including enforcement action) of VOC emissions from the forest products industry from roughly 1970 to present with implementation of the PWCP MACT. From 1970 to late 1980's little was known about VOC emissions. Many air permits for wood products manufacturing facilities (lumber mills, plywood plants, particleboard mfg., and MDF mills) contained generic (AP-42 or its comparables) plant site emission limits and /or emission factors) for VOC emissions, however little was known about the specific compounds of these VOC emissions and the speciation of terpenes from VOC laden gas streams.

Sampling and test methods for these compounds was limited to EPA Method 25, and while it was good at the time, it lacked the real- time data of the analyzer method, EPA Method 25A. EPA Method 25A allowed data to be collected easily, but at the time it was accepted by regulatory authorities, it was determined that the method only detected 50% of methanol in the gas stream, none of the formaldehyde emission, and the analyzer co-mingled methane emissions as VOC emissions, due to the calibration gases in many cases being propane.

Hence, as a result of the above situation, non-methane VOC (NMVOC and NMTHC) measurement techniques became the primary means of determining VOC emissions. Around 2006 to 2007, ODEQ adopted the "VOC on an VOC Basis" policy of determining VOC emissions from wood products sources, which in hindsight is what should have been done all along, and could have been implemented, 10 to 12 years ago, without much trouble.

The above activities and shifts in regulatory stance resulted in many, if not all of wood products manufacturing firms, to understate their VOC emissions. When better emissions factors were developed and thus incorporated into each facilities air permit PSEL baseline adjustments were required. Some manufacturing firms did not fare so well out of this process, as Weyerhaeuser Company, Willamette Industries, and Boise Cascade Corporation, to name a few, were served with EPA scrutiny and Consent Decree orders and were heavily penalized for understating their VOC emissions.

Given the above history with VOC emissions and the wood products industry, I am deeply afraid that we as a group are headed to the same mistakes and process with $PM_{2.5}$ emissions and PSEL regulation. In summation, how can we regulate effectively without effective means and technology to measure $PM_{2.5}$ emissions from wood products
sources ?

Comment #3 – GHG and GHG PSEL Regulation

The subject of Greenhouse Gases (GHG) for forest products company owners that also own timberland and forests is becoming a touchy one. Currently forest products company owners and ownership that own manufacturing or conversion facilities (mill's) that also own timberland and forestland that sequesters CO_2 gases and emissions are being held to an increasing pile of fees (i.e. annual GHG reporting fees and related annual paperwork). The adoption of an ODEQ policy and regulation that places the GHG manufacturing emissions in Title-V and ACDP permits as part of PSEL is headed to a place that can summed up as "taxation and regulation without representation".

In essence under this proposed regulation, many company owners will be faced with higher fees and administrative costs, without realizing the benefit of forest ownership that sequesters CO_2 and GHG emissions. In other parts of the world (i.e. New Zealand and regulation under the Koyto Treaty) each hectare of forest can sequester 25-30 metric tons of CO_2 per annum. Starting 2011 many forest owners in New Zealand have the options of receiving "carbon credits" and using these credits as offsets or selling them and receiving income for the sequestering of carbon based emissions. It appears bothersome that nations under the Koyto Treaty have adopted this solid policy, yet we in the United States have yet to discuss it, and take what is beneficial from it. It could easily be applied fairly to industry and our local, state, and federal governments in the United States.

The current ODEQ and EPA policies do not take these issues into respect of parties that own CO_2 sequestering assets, and thus manufacturing owners are in some ways being regulated at both ends of the spectrum, and being stuck with fess without and "netting basis" for the CO_2 or the CO_2 equivalent offsets (forests) that they have owned and operated for years.

In conclusion, thank you for your time and consideration in these matters.
If you have any questions please feel free to contact me at (541) 601-9469.

Respectfully Submitted,

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General Manager
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