

State of Oregon
DEPARTMENT OF ENVIRONMENTAL QUALITY

Relationship to Federal Requirements

Oakridge PM_{2.5} Attainment Plan

Answers to the following questions identify how the proposed rulemaking relates to federal requirements and the justification for differing from, or adding to, federal requirements. This statement is required by OAR 340-011-0029(1).

1. Is the proposed rulemaking different from, or in addition to, applicable federal requirements? If so, what are the differences or additions?

This rulemaking imposes additional requirements to implement the applicable federal requirements for compliance with particulate standards. Section 110 of the Clean Air Act, 42 U.S.C. §7410 requires DEQ/LRAPA to adopt an attainment plan to reduce particulate matter of 2.5 micrometers and less (PM_{2.5}) in order to bring the Oakridge area into compliance with the National Ambient Air Quality Standards (NAAQS) by December 2014. The plan must also show the area will continue to meet NAAQS in the future and provide contingency measures in case it fails. Federal requirements mandate adoption of a plan that demonstrates the area will reach attainment of the standard; however, the specific strategies to achieve the standard are not mandated.

The Oakridge PM_{2.5} Attainment Plan is a comprehensive mixture of emission reduction strategies consisting of local ordinances, LRAPA regulations, DEQ regulations, and non-regulatory elements including incentives and education. Residential wood combustion is the most significant contributor to PM_{2.5} in Oakridge. The strategies targeting reduction in woodstove emissions include: revised woodstove curtailment levels to increase number of days when burning is restricted or prohibited, requiring removal of an uncertified woodstove upon sale of a home, tightening enforcement of wood stove curtailment, and expansion of educational efforts to reduce PM_{2.5} from woodsmoke. The plan also requires public agencies to avoid prescribed burning if the smoke is expected to affect Oakridge.

In the event that listed strategies fail to bring Oakridge into attainment with the standard, a second set of contingency strategies would become effective. These strategies include: a stricter opacity limit, revising the current 40% opacity limit to a more restrictive 20% limit, as has been done in some other northwest communities; a stricter green-yellow-red advisory program, with more yellow and red advisory days each winter; and further restrictions on the city woodstove curtailment exemptions (for sole source, economic hardship).

2. If the proposal differs from, or is in addition to, applicable federal requirements, explain the reasons for the difference or addition (including as appropriate, the public health, environmental, scientific, economic, technological, administrative or other reasons).

Federal requirements set by EPA outline the procedures for preparing, adopting and submitting attainment plans, but Oregon has flexibility about how to meet the standards by establishing specific requirements. LRAPA worked with a local advisory committee to select the emission reduction strategies that are included in the plan and are necessary to meet the federal standard. The elements of the Oakridge plan include emission inventories, modeling, air quality monitoring and analysis, attainment demonstration, and enforcement mechanisms.

3. If the proposal differs from, or is in addition to, applicable federal requirements, did DEQ consider alternatives to the difference or addition? If so, describe the alternatives and the reason(s) they were not pursued.

In developing the proposed strategies for the Oakridge plan, LRAPA, the advisory committee and Oakridge City officials considered a number of alternatives. The proposed strategies were recommended over alternatives based on evaluation of their technological feasibility and environmental, health, economic, and social impacts. The advisory committee recommended two sets of strategies: an initial set of strategies that will bring the community into compliance with the federal PM_{2.5} air quality standard by 2014 and a second set of contingency strategies, with stricter requirements for residents who use wood stoves, which would be implemented in the event that the federal PM_{2.5} standard is not met in 2014. Both sets of strategies are included in the Oakridge plan.