**Notes from 6/4/13 Discussion with Phil Allen to Address Jim Roys questions on the fiscal impact statement portion of the rulemaking packet for the Infrastructure SIP submittal for NO2, SO2 and Pb.**

**Universe of affected sources**

Adoption of the 1-hr NO2 and SO2 NAAQS will affect only sources that trigger New Source Review/Prevention of Significant Deterioration and those are only a handful of sources, if that, a year.  The new standards will affect the modeling they have to do.

Ex: River Bend Landfill – Hydrogen Sulfide flared, when volume gets large enough, combusted to generate electricity (process emits SO2)

Ex: See also drafts from Jeffrey – data centers, etc.

If >SER, must do AQ modeling – series of screening steps (each less stringent than previous)

* SER for NO2 = 40 tpy
* SER for SO2 = 40tpy
* SER for Pb = none (3-month rolling avg)

**Additional rulemaking needed?**

No, we do not need any additional rulemaking once the standards are adopted unless we have nonattainment areas, which we won’t. (JI)

**Data on permittees = large and small sources?**

Data query request to B. Fields.

\*size of business may not correlate well with emissions rates, which is what triggers additional costs (ERs trigger costs associated with modeling)

That said it does seem that TRAACS has a “greater than 50 employees” flag that can be queried. This might be a good Cindy question as it stands or maybe from Brandy’s list of companies with those pollutants we can secondarily count if they are big or small. However this distinction is made at the parent company level and not the individual facility here in OR. Some facilities may be affected by this nuance, i.e., Under 50 here but owned by coca-cola which would be obviously over 50.

**Ball-park costs (high-end) for modeling (consultation)**

No modeling = no costs

If source can show the emissions increase is less than SER, do nothing

If emissions increase > SER, need to run modeling (sources often hire a consultant)

Costs:

1) quantifying emissions – simplest ~ $10,000

2) Consulting for modeling if emission rates > SER = biggest costs (must model for all NAAQS above SER) ~ $100-200K

**Monitors: DEQ or Source or Both?**

DEQ measures ambient AQ in neighborhoods, sources conduct compliance monitoring

ASK Anthony:

* is anyone currently conducting compliance monitoring for NO2, SO2? If so, which standards?
* DEQ plans for near-rdway monitoring of NO2?
* Costs associated with:
	+ Capital (equipment costs)
	+ Location citing
	+ Power sources
	+ Audits

Compliance Monitoring- source installed, located at source

* Cost borne by source (sometimes contracted out)
* DEQ protocol, where located, how maintained, who keeps track of data
* Quarterly Audits by independent third party (separate consultant than does the monitoring) – checks equipment calibrations/accuracy of device (ex=Dames & Moore)