LANE REGIONAL AIR PROTECTION AGENCY

Rulemaking Proposal

for

Adoption of Air Quality Permit Program Streamlining and Updates

Additional Information on Proposed Rule Changes

Summary of Rule Changes and Rule Stringency Analysis

Summary of Proposed Major Concept Changes

The Lane Regional Air Protection Agency (LRAPA) is proposing significant changes to its permitting rules in an effort to maximize efficiencies in the program, while maintaining the existing level of environmental protection. These changes are part of The Oregon Department of Environmental Quality's (ODEQ's) air permit streamlining project phase one and phase two (SPPITT I and II).

The major concepts covered by the proposed changes to the AQ permitting rules include:

A. Permitting:

- General Permits – increased use of permits that apply to categories of businesses that are all subject to the same requirements
- Combining and splitting sources –a standard procedure to address netting basis, New Source Review (NSR) and Plant Site Emission Limits (PSELs) for multiple sources that become one source or one source that becomes multiple sources
- Generic bubble authority – realignment of bubble authority with EPA rules and guidance
- Notice of Construction – combine and simplify construction approval requirements

B. Plant Site Emission Limits:

- Generic PSELs – alternative to individual limits for smaller emission sources
- Potential to Emit (PTE)– make the PSEL into a PTE limit by changing it to a rolling 12 month rather than a calendar year limit
- Short Term PSEL – eliminate the short term PSEL where there is no existing authority to deny an increase
- Unassigned Emissions – define and limit approved emissions that exceed a facility's ability to emit due to changes made that have reduced capacity

C. New Source Review:

- New Source Review streamlining– simplify applicability and eliminate procedures with no environmental value

- Netting Basis – define emission level that is used for comparison to proposed increases for the purpose of determining the appropriate review requirements
- Emission Reduction Credit (ERC) – clarify procedures to create and bank emission reductions due to over control or shutdown
- Offsets – standard procedure to determine the required offsets when a source triggers NSR
- Pre-construction Monitoring – establish alternatives to pre-construction ambient monitoring through modeling and post construction ambient monitoring
- Ozone precursors – improve the analysis of ambient impacts on ozone areas due to nitrogen oxides (NO_x) and volatile organic compound (VOC) emissions increases

D. <u>Public Participation:</u>

- Public Participation – improves effectiveness of public's ability to comment on proposed permit actions and focus LRAPA resources on changes that have environmental significance

E. <u>Other Rule Clean-up:</u>

- General Definitions – reduce duplicative and conflicting definitions contained in more than one Title and provide clarification for certain definitions.
- Delisting Compounds as VOCs – Update the list of compounds that are defined as not contributing to ground level ozone or smog to coincide with EPA and ODEQ VOC definitions.
- Revisions to Excess Emissions Rules – Updates based upon comments from EPA to be consistent with Federal Title V rules and ODEQ.
- SO2 Averaging – To align with federal standards, LRAPA proposes to change the averaging time in the sulfur dioxide standards for fuel-burning equipment from two to three hours.
- Revisions to Incinerator Rules – Provide clarification on effective dates for rules, emissions standards and definitions of terms.
- Revisions to Kraft Pulp Mill Rules – Improve the section of rules specific to Kraft Pulp Mills by reducing redundancy with Federal standards.
- Simplified Rules for Wood Products Sources – Clarify emission requirements for plywood, particleboard and hardboard manufacturing facilities by specifying uniform measurements and compliance methods.
- Changes to Emission Standards Definitions to Specific Industries – Provide corrections to rule references for charcoal producing plants and definitions for other specific industries.

The following summaries briefly explain each of the above listed major concepts.

Rule Stringency Analysis

At the December 17, 2007 LRAPA Industrial Rules Advisory Sub-committee meeting it was requested that LRAPA provide an analysis of each major section of proposed rule changes including an evaluation of the rules with the following criteria:

1. Meet or exceed federal and state standards ("**Stringency**").
2. Neutral or beneficial air quality impact ("**AQ Impact**").
3. Neutral revenue impact on the Agency and overall neutral revenue impact on permit holders ("**Revenue**").
4. Maintain or enhance opportunity for public participation ("**Public Participation**").
5. Streamline rules and permits such that the Agency and industrial sources can focus on most important issues of air quality ("**Workload**").

The only changes to public participation are the proposed changes to Item 16 below. Public participation will be maintained or enhanced under the proposed changes.

The remaining proposed sections will be evaluated against the four (4) remaining criteria and the evaluation possibilities:

- Stringency –"Met or exceeded", or "Less Stringent"
- AQ Impact – "Neutral" or "Beneficial"
- Revenue – "Neutral", "Increase", or "Decrease"
- Workload – "Neutral", "Increase", or "Decrease".

A. Permitting

1. General Air Contaminant Discharge Permits:

The proposed rule changes expand the LRAPA's ability to write permits for categories of businesses instead of individual permits. These permits, known as General Air Contaminant Discharge Permits (ACDPs), allow the permittee to operate as if it had a source specific permit. Individual businesses are 'assigned' to the General ACDP if they meet the criteria for the General ACDP. Businesses that are required to have a permit but do not fit the parameters of an existing General ACDP will still need an individual ACDP.

Expanding the use of general permits will be possible because of changes in the PSEL rules that will allow for "Generic PSELs" (see below).

For example, LRAPA currently has over 20 permits issued for rock crushers. Of these, nearly half have individualized permits with PSELs established based on the source's expected amount of rock crushed per year for the next five years. Almost all of these permits have the exact same conditions, whether the business crushes 10,000 or

1,000,000 tons of rock per year. In fact, stricter regulations do not apply to these businesses unless they crush more than 1,180,000 tons of rock in any twelve-month period. Therefore, a General ACDP can be issued for most rock crushers with a generic PSEL set below the level that triggers new requirements.

Fees for General ACDPs will be less than fees for other types of ACDPs. General ACDPs will have three cost categories that are based on the type of the General Permit.

The proposed rule changes will not affect how LRAPA conducts inspections and enforcement because inspections and enforcement are not dependent on whether a business is on a general or individual permit.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Agency –Decrease, Permit Holders – Neutral/Decrease (see fee and FTE analysis included as Attachment B to this report).
Workload: Decrease (Short-term increase, long-term decrease).

Overall: Neutral – Revenue decrease expected to be offset by workload decrease.

2. <u>Combining and splitting sources:</u>
The proposed rule changes set forth procedures for combining facilities when they meet the definition of a single source, and for splitting one source into multiple sources when they no longer meet the definition of a single source. Two sources that become one source could combine their netting basis, but would get only one significant emission rate (SER). One source that splits could divide its netting basis and SER however it wants, but the new sources would not get multiple SERs, unless one or more of them satisfies the New Source Review requirements.

A formal process is needed to ensure that sources are being treated consistently statewide when they combine or split their operations. The proposed rules define source as: 1) Being under common ownership or control, 2) Having a common 2 digit standard industrial classification (SIC) or supporting the major 2 digit SIC, and 3) Being on contiguous or adjacent properties. The proposed rules define “adjacent” as interdependent and nearby, consistent with EPA guidance. This will allow for simplified processing of requests to split or combine operations and also will allow a source to move to a new adjacent site without having to get a new permit if the time between operation at the old and new sites is less than six months.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

Overall: Neutral – Only clarifies federal rules at local level, no new regulations.

3. Generic bubble authority:

A "bubble" is an alternative emission control concept that allows one device to exceed a specific limit if another device at the same site is over-controlled and the combined emissions will meet the limit of all devices included in the bubble. Bubbles must be specifically addressed in a permit if they are going to be used. The proposed rule revisions make the LRAPA's bubble authority consistent with EPA's requirements. LRAPA will have authority to approve simple bubbles on its own. Complex bubbles will require EPA approval either through a SIP revision or a Title V permit.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

Overall: Neutral – Only clarifies federal rules at local level, no new regulations.

4. Notice of Intent to Construct and Notice of Approval:

The proposed rule changes combine the two construction approval programs into one set of rules to clarify and streamline the procedural requirements. Those changes with the highest environmental and public health significance will receive the most scrutiny. Proposed changes that are of low environmental and public health significance may proceed ten days after submitting the required information. The proposed changes establish different levels of review and approval for four types of construction changes:

1. Type 1 changes have no increase in emissions from individual stationary sources and no increase in PSEL. Type 1 changes have a 10 day notice-and-go approval procedure.
2. Type 2 changes may have increased emissions from individual stationary sources less than significance level but no increase in the PSEL. Type 2 changes a have a 60 day notice and approval procedure, which is the same as current procedures.
3. Type 3 changes may increase emissions from individual stationary sources by less than the significance level and may increase the PSEL up to the significance levels. A Construction ACDP or a new or modified Standard ACDP is required for approval of Type 3 changes.
4. Type 4 changes increase emissions from individual stationary sources by more than the significance level or may increase the PSEL by more than the significance level. A new or modified Standard ACDP is required for approval of Type 4 changes.

The proposed rules exempt certain activities, such as installing a domestic heating system, from notice of construction. The proposal also clarifies the types of construction changes that need operating permits before operation can begin.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Decrease
Workload: Decrease (short and long-term workload decreases).

Overall: Neutral – No construction fees for Type 1 and 2 changes so less revenue collected but this is expected to be offset by the reductions realized by notice-and-go for Type 1 changes and Agency not having to approve each of the changes.

B. Plant Site Emissions Limit

5. Generic Plant Site Emission Limit:

The proposed rule revisions will create an optional Generic PSEL as an alternative to individually calculated PSELs. This Generic PSEL streamlines the permitting process by eliminating source-specific emission calculations for the purpose of setting limits in the permit. It also greatly reduces the number of permit modifications that must be processed because it eliminates the need for small increases in the PSEL.

The proposed rules set generic PSELs at a level just below the significant emission rate, which is the level where additional air quality analysis is required. Sources with emissions less than the significant emission rate will qualify for a Generic PSEL instead of a source-specific PSEL. A source may opt for a generic PSEL for one or more pollutants. A source may not retain baseline emissions for pollutants with generic PSELs. Any increase above the Generic PSEL will require a source-specific PSEL and additional air quality analysis.

Generic PSELs can be used within General Permits (see above). Generic PSELs can also be used to establish enforceable limits to keep emissions below the thresholds for major New Source Review and Title V.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Decrease (less modifications, less modification fees).
Workload: Decrease (short and long-term workload decrease).

Overall: Neutral – Decrease in permit fee revenue potentially offset by decrease in workload.

6. Make the PSEL into a potential to emit (PTE) limit:

By establishing a rolling 12 month PSEL instead of a calendar year PSEL, the PSEL would limit a source's potential to emit. The rolling 12 month basis is needed to make a limit of a source's potential to emit practically enforceable. This will eliminate the need for other production-related emission caps to keep sources from triggering other air quality requirements, such as New Source Review and Title V. Generic, as well as source-specific PSELs, may be used to establish the PTE limit. Demonstration of compliance with the PSEL will also show compliance with the PTE limit. Permittees will have the opportunity to adjust their baseline emission rate (see netting basis below) from a calendar year to a rolling 12 month basis, if needed.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Decrease (Moderate to Significant short and long-term decrease due to not having to calculate the PTE or other specific PTE limits in the permit.)

7. Eliminate the Short Term PSEL:

Existing rules require a short term PSEL in all regular permits. In Lane County however, there are no restrictions or trigger levels that require additional analysis to increase the short term limit. This change reduces the work load of establishing short term PSELs where there is no environmental benefit, and eliminates permit modifications to change a short term PSEL where there is no basis to deny the change. This change does not affect other existing short term limits, such as opacity or grain loading limits in the rules that are important to protect air quality.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Decrease (Significant short and long-term decrease by the elimination of workload related to establishing and tracking compliance with short-term PSEL.)

8. Unassigned Emissions:

The proposed rule revisions define unassigned emissions as the difference between the netting basis (see below) and the source's current potential to emit (PTE), after taking into account banked emission reduction credits (see below). If current PTE is equal to or greater than the netting basis, then a facility has no unassigned emissions.

This proposed rule revision sets up a consistent way of establishing and managing unassigned emissions. If a facility adds new emitting equipment, unassigned emissions can be used to offset the emissions increase through a permit modification. The proposed rule also limits the total amount of unassigned emissions that can be maintained at a facility and establishes a process to reduce excess unassigned emissions over time. The owner or operator may maintain part or all of the unassigned emissions until 2013. This time period can be extended by 10 years if a facility banks a voluntary reduction of actual emissions within two years of the reduction. This allows facilities to plan for growth and streamlines LRAPA's process of meeting and maintaining air quality standards.

Stringency: Met or Exceeded
AQ Impact: Beneficial- potential slight beneficial AQ impact due to increase in likelihood that sources trigger NSR.
Revenue: Neutral

Workload: Decrease – Significant long-term decrease by eliminating workload of recalculating baseline, etc**.** Possible slight short-term increase in workload to ensure proper emission totals.

C. New Source Review

9. New Source Review streamlining:

The proposed rules transfer approval of emission increases at smaller sources (below federal emission thresholds) to the PSEL rules rather than the NSR rules if located in areas that meet air quality standards. This results in the same level of environmental protection with less administrative burden. The changes also eliminate some procedural steps that duplicate other requirements or do not add environmental value for facilities below federal emission thresholds. In addition, the changes clarify and consolidate analytical requirements and exempt environmentally beneficial pollution control facilities from NSR. This eliminates administrative burden without jeopardizing air quality.

Stringency: Met or Exceeded [see Appendix A to this report]
AQ Impact: Neutral
Revenue: Neutral
Workload: Decrease (slight short and long-term workload decrease).

10. Netting Basis:

LRAPA proposes to add the definition of netting basis to clarify permitting requirements relating to emission increases.

The proposed definition of netting basis is:

Baseline emission rate
- MINUS reductions required by rule or order
- MINUS unassigned emissions that have been reduced
- MINUS emission reduction credits transferred offsite
- PLUS increases approved by NSR

When a facility proposes to increase emissions, the netting basis is compared to the requested PSEL to determine if more stringent review is required.

In addition to defining the netting basis, LRAPA proposes that all baseline emission rates be frozen with the first permitting action after the adoption of these rules. Re-establishing the baseline emission rate for any business is very resource intensive because finding adequate 1977 or 1978 records to justify the change is very difficult. The proposed rule allows future changes to the baseline emission rate only when better emission factors are established, an emissions unit that is part of the current facility's operation was erroneously believed to have negligible emissions, or when a new pollutant is added to, or removed from, the list of regulated pollutants.

Stringency: Met or Exceeded

AQ Impact: Neutral
Revenue: Neutral
Workload: Overall Decrease (Initial increase, long-term decrease).

11. Emission Reduction Credits (ERC):
Proposed changes to LRAPA Title 38 to clarify what constitutes a valid ERC, how to create one and how to extend its life through banking. Only actual emission reductions will be used as ERCs. Existing source over-control, partial and total source shutdowns, and curtailments are acceptable for creating ERCs if the emission reductions are actual, permanent, surplus, and enforceable. Previous restrictions on banking shutdown credits will be removed as a result of the unassigned emissions program (see Unassigned Emissions above). These two changes must go hand-in-hand to maintain the current level of environmental protection.

Applications for banking ERCs must be made within the two-year contemporaneous time period starting when the actual emission reduction occurs. Banking extends the life of ERCs to ten years from the actual reduction. Banked ERCs would be protected from rule-required reductions during the banked period unless LRAPA specifically determines that they must be reduced as part of attainment or maintenance plan requirements.

All unbanked ERCs, that are not transferred offsite, would expire at the end of the contemporaneous 2 year time period and become unassigned emissions.

Banked ERCs are different from unassigned emissions because they can be transferred to another source through a NSR action for up to 10 years after the reduction occurred. Unassigned emissions can only be used at the source that created them after the 2 year contemporaneous period expires.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

12. Requirements for offsets:
NSR rules use the term “offsets” to refer to an equal or greater reduction in emissions at one site to mitigate the increase in emissions from a second site. Offsets may come from ERCs at other sources that were created during the prior 2 years or banked within the past 10 years. The intent of offsets is to improve air quality in the area of the new or modified facility. The proposed rule revisions clarify offset requirements and consolidate them in one location in the rules.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

13. Alternatives to preconstruction monitoring:

Major new sources and major modifications at existing sources that are subject to NSR may also be subject to preconstruction ambient air quality monitoring. The proposed rule revisions allow an alternative to preconstruction monitoring if worst case modeling shows that impacts will not cause or contribute to a violation of ambient air quality standards. The alternative also requires post-construction monitoring after the facility is built and operating.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

14. Ambient impacts of ozone precursors:

VOC and NO_x emissions promote the formation of ozone and are regulated under NSR rules for ozone. ODEQ has conducted modeling to determine what size source at what distance will cause an impact on ozone nonattainment and maintenance areas. The proposed rules include an equation relating size and distance to determine if VOC and NO_x sources within 100 kilometers of a sensitive area cause impacts on the area. This evaluation is necessary to satisfy EPA requirements that ozone impacts from precursors are being addressed sufficiently. Sources found to cause impacts on nonattainment or maintenance areas must address these impacts as required by PSEL or NSR rules.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

D. Public Participation

15. Public Participation:

Proposed rule changes establish four different categories of permit actions:

1. Category I changes are not environmentally significant and do not involve choices made by LRAPA (e.g., facility name change). These actions will require no prior public notice, but a list of permit actions will periodically be made available for public review after the changes have been made.
2. Category II changes have the potential for low to medium environmental and public health significance (e.g., renewing a simple permit). These actions will require a 30 day public notice period, but not a public hearing.
3. Category III changes have the potential for medium to high environmental and public health significance (e.g., increasing the PSEL). These actions will require a 35 day public notice period and a hearing if requested by 10 or more people or if pre-scheduled by LRAPA. This is very similar to current procedures.

4. Category IV changes have the potential for high environmental and public health significance (e.g., siting a new major facility). These actions will require a public notice when the **application** is submitted and an informational meeting prior to drafting a proposed permit. Once the proposed permit is drafted, a 40-day public notice period and a public hearing will be required.

These changes are consistent with changes recently adopted for ODEQ's Air Quality, Solid Waste and Water Quality programs. LRAPA believes that the proposed changes will improve the effectiveness of the public's ability to participate in the appropriate public notice process.

In addition, the changes will help LRAPA streamline the public notice process by focusing public comment on changes that have the potential for environmental significance and permit conditions that involve choices made by LRAPA.

Public Participation is maintained or enhanced under these changes.

E. Other Rule Clean-Up

16. General Definitions

Proposed changes would relocate several definitions to the General Air Quality Definitions section to make it clear that they apply to all air quality rules. Revisions to the definition of "particulate matter" would improve the cross reference to DEQ's Air Quality Source Sampling Manual and specify test methods. Also changes the definition of "regulated pollutant" to remove unintended requirement to set PSELs for Clean Air Act Section 112(r) pollutants. As of February 2008, ODEQ is undergoing an emergency rulemaking to correct this mistake.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

17. Delisting Compounds as VOCs

The proposed changes would add 1,1,1,2,2,3,3-heptafluoro-3-methoxy-propane (n-C3F7OCH3, HFE-7000); 3-ethoxy-1,1,1,2,3,4,4,5,5,6,6,6-dodecafluoro-2-(trifluoromethyl) hexane (HFE-7500); 1,1,1,2,3,3,3-heptafluoropropane (HFC 227ea); methyl formate (HCOOCH3); and (1) 1,1,1,2,2,3,4,5,5,5-decafluoro-3-methoxy-4-trifluoromethyl-pentane (HFE-7300);, to the list of compounds exempt from the definition of volatile organic compounds (VOC). According to EPA research, these substances have negligible reactivity and very low potential to form ground-level ozone or smog. The compounds have a variety of potential uses including as a heat-transfer fluid and in coating, cleaning, and lubricating applications. This change will benefit air quality in Lane County, because exempting the compounds will allow the LRAPA to focus VOC reduction strategies on compounds that are more responsible for forming ground-level ozone or smog. Delisting will likely have an additional environmental

benefit because the compounds can be used in place of substances that deplete the earth's protective ozone layer and substances with high global warming potentials.

Stringency: Met or Exceeded
AQ Impact: Neutral or Beneficial
Revenue: Neutral
Workload: Decrease (slight short and long-term decrease in workload).

18. Revisions to make Excess Emissions rules consistent with federal Part 70 requirements and EPA State Implementation Plan Guidance.

In its 2006 Title V Program Review, EPA identified several deficiencies in LRAPA's and ODEQ's Excess Emissions rules. Revisions to these rules would achieve two main objectives. First, they would clarify that the affirmative defense of emergency does not take away LRAPA's enforcement discretion, but is relevant when evaluating a violation to determine the level of penalty. Second, the revisions would consolidate the notification and reporting requirements and the criteria for demonstrating emergency as an affirmative defense. These changes would improve enforceability and ensure continued Title V Program and State Implementation Plan (SIP) approval. The excess emission rule revisions are also needed to make LRAPA's rules consistent with the September 20, 1999 EPA State Implementation Plan Guidance titled: "State Implementation Plans: Policy Regarding Excess Emissions During Malfunctions, Startup, and Shutdown," from Steven A. Herman, Assistant for Enforcement and Compliance Assurance, et.al.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

19. SO2 Averaging

To align with federal standards, LRAPA proposes to change the averaging time in the sulfur dioxide standards for fuel-burning equipment from two to three hours. The averaging time is the period during which measurements are taken to determine compliance with a standard. Measurements of a pollutant are averaged for comparison to the standard. Currently, some facilities must demonstrate compliance with both two and three hour averaging periods. LRAPA does not expect this change to affect air quality or rule stringency. It will simplify compliance determinations by eliminating duplicative standards.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Decrease (slight short and long-term workload decrease).

20. Revisions to Incinerator Rules

Proposed revisions to the incinerator rules would clarify and consolidate definitions and clarify the requirements for operating crematory incinerators. These revisions would be consistent with current implementation and rule interpretation. There will be no increase in workload for permitted sources or LRAPA and the changes would not affect air quality or rule stringency.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

21. Revisions to Kraft Pulp Mill Rules

LRAPA adopted the Kraft Pulp Mill Rules in 1973. Since then, EPA has promulgated New Source Performance Standards (NSPS) for kraft pulp mills. Process units at some mills were modified after the NSPS applicability date, making those units subject to the NSPS. Several sections of the kraft pulp mill rules are redundant for mills with process units that are subject to the NSPS. As a result of these redundancies, Title V permits now include multiple permit conditions that set similar limits for the same emission sources and pollutants. In some cases the limits are the same; in other cases they are different with the lower limit being more stringent. Revisions would streamline the kraft pulp mill rules by eliminating redundancies. The revisions would also simplify permitting and compliance determinations and eliminate unnecessary reporting. There could be a minimal decrease in workload for LRAPA and permitted sources. These changes are not expected to affect workload, air quality or rule stringency.

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Decrease (slight short and long-term workload decrease).

22. Simplified Emission Standards for Plywood, Particleboard and Hardboard Manufacturing Operations

The current board product standards are confusing. In one section the standards are based on square foot of product, but in another section the standards are hourly emission limits based on maximum production rates. As a result, these standards have been interpreted inconsistently for many years. Proposed revisions to these standards would clarify emission requirements for plywood, particleboard and hardboard manufacturing facilities by specifying uniform measurements and compliance methods. These revisions would also limit applicability of state-specific rules to sources not subject to federal standards and include procedures to determine compliance. These revisions would facilitate permitting and are not expected to affect air quality or rule stringency.

Stringency: Met or Exceeded

AQ Impact: Neutral
Revenue: Neutral
Workload: Neutral

23. <u>Changes to Emission Standards for Specific Industries</u>

Proposed changes to these rules would consolidate definitions and clarify them for consistency with other titles. These changes will not affect air quality or rule stringency. These changes also include requesting delegation for recently issued New Source Performance Standards (NSPSs) and National Emission Standards for Hazardous Air Pollutants (NESHAPs).

Stringency: Met or Exceeded
AQ Impact: Neutral
Revenue: Neutral
Workload: Decrease (slight short and long-term workload decrease).