From: Martha Moore
To: AQFeb2011Rules
Subject: New Source Review, Particulate Matter and Greenhouse Gas Permitting Requirements and Other Permitting Rule Updates
Date: Wednesday, November 24, 2010 3:15:36 PM

Dear DEQ Staff and Concerned Participants:

I am submitting a comment on the issue of whether DEQ should use the same New Source Review (NSR)/Prevention of Significant Deterioration (PSD) process for the greenhouse gas pollutants as currently used for all other pollutants in Oregon, or should adopt the federal NSR/PSD methods. I strongly urge the continued use of the Oregon NSR/PSD methods for all pollutants regulated in the future, and particularly for the greenhouse gas pollutants.

I have worked assisting businesses in numerous states with air permitting over the past 20 years. I have particularly worked with many small and family-owned businesses over that same time period. Although many of the small businesses I have worked with have not been subject to NSR/PSD, I believe that will change in the future as the thresholds that trigger NSR/PSD permitting are lowered (this intent seems fairly clear in the preamble to the federal Tailoring Rules for Greenhouse Gases). The Oregon NSR/PSD regulations are in some ways more stringent than the federal regulations and in some ways more lenient. The Oregon program does provide an incentive for businesses to reduce emissions and not continue the operation of outdated equipment simply to maintain an emissions base. However, the true hallmark of the Oregon program from my perspective is that the program is more comprehensible, less convoluted, and more predictable than the federal program. As these programs begin to affect smaller businesses, the adverse effects will be reduced if the regulations are comprehensible and predictable.

I strongly urge the continued use of the Oregon approach to NSR/PSD, and if possible, some outreach to smaller businesses likely to be affected by these regulations in the future. Most of the potentially affected smaller businesses are completely unaware that this major regulatory program may affect them.

Thank you for the opportunity to comment.

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