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| **Commissioner** | **Armstrong** | **Eden** | **Johnson** | **O’Keeffe** | **Rider** |
| Hardcopy | Yes |  | No |  | Yes |
| Individual Meeting | Yes  Week of 3/15 or 3/29? | Re-ask by 02/10 | Yes  1st week of April | Re-ask by 02/10 | Yes  Week of 3/15 or 3/29? |
| David C, Jeffrey, George, Jill to meet with commissioners | | | | | |

Outstanding Questions:

1. **Is it necessary to keep Net Air Quality Benefit if it isn’t workable?**

*Net Air Quality Benefit has been an important part of DEQ’s New Source Review program since its inception in the early 1980s. For areas where air quality is marginal or poor, we wanted to provide facilities the opportunity to construct or modify as long as they could improve overall air quality in the area.*

*When total particulate was the pollutant of concern, facilities were able to get offsets from other industrial facilities and show a Net Air Quality Benefit. Now that PM2.5 is the issue, caused mostly by woodstoves, our test for Net Air Quality Benefit is no longer workable. So we want tweak the requirements of Net Air Quality Benefit to ensure that facilities can still construct or modify and improve air quality at the same time.*

*If we ever wanted to remove net air quality benefit from our rules, we would have to make a showing that this removal would not be considered a relaxation, which would be a high hurdle according to EPA Region 10 staff. EPA has worked with DEQ to improve the language, making it workable for PM2.5 nonattainment areas.*

1. **How do you track woodstove changeouts and link those offsets to industrial emission increases? Where does the funding come from? How do you tie the befits and outcomes to the permit program?**

*In designating priority sources, DEQ is providing incentives to facilities to improve air quality in the area by reducing emissions from the cause of the problem, which are woodstoves in Lakeview. Achieving all the offsets from woodstoves may be difficult so offsets from other industrial facilities are also an option.*

*DEQ will include permit conditions detailing how many woodstove replacements would be required to offset the new/modified facility’s increased emissions. These permit conditions would ensure that woodstove offsets are permanent, quantifiable, and enforceable. If the facility did not comply with the requirement to replace X amount of woodstoves, DEQ would take enforcement action for the permit violation. If industrial offsets are used, DEQ would modify the permit of the offsetting facility to ensure compliance.*

*DEQ would track the woodstove offsets by identifying a government agency or other entity to serve as the “Bank” and develop procedures to meet the intent of the rule. If grant money is available, the “Bank” could initiate the woodstove changeout program, hold the credits and sell them to the facility that wants to construct or modify. If grant money was not available, the new or modified facility would provide funding. There would be a detailed accounting of the number of woodstoves removed and the emission from each changeout.  The purchaser would be required to get documentation from the “Bank” for DEQ to verify the emission offsets.*

1. One of the questions that has been forming in my mind is how do each of the rules such as Clean Fuels, etc. work together to support overall air quality and looking to the future do these rules provide protection for population growth in our urban areas which are beginning to have new air quality challenges?