Dear Legislators;

As promised, DEQ is informing your offices that our large package of Air Quality permitting rules is now available for public comment. Of particular interest to you are the revisions to the particulate and opacity standards that we discussed with you and affected businesses in late 2013 and early 2014. For your convenience, I’ve summarized the current particulate and opacity standards and the proposed changes to those standards in the table below:

|  |  |  |
| --- | --- | --- |
| **Date** | **Pre 1970 Equipment** | **Post 1970 Equipment** |
| Current Standard | 0.2 particulate (0.2 is interpreted as 0.24) and 40% opacity | 0.1 particulate (0.1 is interpreted as 0.14) and 20% opacity |
| Upon adoption (sources that currently test at **less than or equal to 0.080** particulate)  01/01/20 | 0.10 particulate and 40% opacity  Opacity changes to 20% | 0.10 particulate and 20% opacity |
| Upon adoption through 12/31/19 (sources that currently test at **greater than 0.080** particulate) | 0.2 particulate (0.2 is interpreted as 0.24) and 40% opacity | 0.1 particulate (0.1 is interpreted as 0.14) and 20% opacity |
| Starting 01/01/20  (sources that currently test at **greater than 0.080** particulate) (can request a 1 year extension to meet the 0.15 particulate) | 0.15 particulate\* and 20% opacity\*\* | 0.14 particulate and 20% opacity |
| Starting 01/01/20 (equipment or fuel used less than 876 hours/year) | 0.20 particulate and 20% opacity | NA |

\*Sources must submit request by 10/01/19 for a source specific limit of 0.17 particulate if unable to meet 0.15 particulate along with report from registered professional engineer confirming noncompliance after maintenance/upgrades to multiclones or boiler tune-up

\*\*40% opacity allowed during grate cleaning operations

Based on changes made by DEQ to the original concept, we have identified two businesses with wood fired boilers that may be affected by this proposed rulemaking. Boise Cascade in Pilot Rock has one 1940s wood fired boiler that is used as a backup to the natural gas boilers. They could either request a source specific limit of 0.17 particulate or add a multiclone system to keep this wood fired boiler operational. Swanson Group in Roseburg has two 1968 boilers that may need source specific limits of 0.17 particulate if boiler tune-ups or maintenance and upgrades to their multiclone system do not reduce emissions to 0.15 particulate. The Swanson Group boilers are identical to the boilers at Frank Lumber, which can meet 0.15 particulate.

More information on this rulemaking can be found at DEQ’s website by accessing this link: [www.oregon.gov/deq/RulesandRegulations/Pages/2014/aqperm.aspx](file:///\\DEQHQ1\AGARTENBAUM\SharePoint%20Drafts\www.oregon.gov\deq\RulesandRegulations\Pages\2014\aqperm.aspx) . The website includes all public notice documents and information on how to submit comment. The deadline for public comment is July 31, 2014.

If you have questions or comments, please let me know. And as a closing remark, I want to acknowledge your willingness to meet several times in 2013 and early 2014 to productively discuss concerns relating to this proposed rulemaking.

Sincerely,

Palmer Mason