Comparison of Current and Proposed Requirements for PSEL increases above SER in Attainment, Nonattainment and Maintenance Areas (Minor and Major NSR/PSD)

***Nonattainment Areas***

|  |  |  |
| --- | --- | --- |
| **Program Elements** | **Current Requirements** | **Proposed Requirements** |
|  | **Source Emissions after the PSEL increase 100 tons per year or more** | |
| Source Classification | Major | **Federal** Major |
| Preconstruction Monitoring | n/a | n/a |
| Control Technology | LAER \* | LAER \* |
| AQ Analysis-NAAQS/Increments/  AQRV | AQRV analysis (Federal Majors only) | AQRV analysis |
| NAQB | Offsets   * 1.1:1 for ozone * 1.0:1 for other pollutants \*\*   Reduce impacts at majority of receptors; and  Impacts less than SIL at all receptor | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** |
| Additional Impacts | n/a | n/a |
| Alternatives Analysis | Alternative sites analysis \* | Alternative sites analysis \* |
| Certify Compliance | Certify compliance for all sources \* | Certify compliance for all sources \* |
|  | **Source Emissions after the PSEL increase SER to 99 tons per year** | |
| Source Classification | Major | **Minor** |
| Preconstruction Monitoring | n/a | n/a |
| Control Technology | LAER \* | **BACT** \* |
| AQ Analysis-NAAQS/Increments/  AQRV | AQRV analysis | n/a |
| NAQB | Offsets   * 1.1:1 for ozone * 1.0:1 for other pollutants \*\* * Reduce impacts at majority of receptors; and * Impacts less than SIL at all receptors | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** * **Source plus competing sources since area was designated less than 10% of the NAAQS** |
| Additional Impacts | n/a | n/a |
| Alternatives Analysis | Alternative sites analysis \* | n/a |
| Certify Compliance | Certify compliance for all sources \* | n/a |
|  | **Source Emissions after the PSEL increase less than SER** | |
| Source Classification | Minor | Minor |
|  | NC rules or ACDP | NC rules or ACDP, no change |

\* If a Major Modification is involved

\*\* Offset ratio varies for certain areas such as Medford PM10, etc.

***Somewhere explain change to FM classification***

***Maintenance Areas***

| **Program Elements** | **Current Requirements** | **Proposed Requirements** |
| --- | --- | --- |
|  | **Source Emissions after the PSEL increase 100 tons per year or more** | |
| Source Classification | Major | Federal Major |
| Preconstruction Monitoring | Preconstruction Monitoring \*\*\* | Preconstruction Monitoring \*\*\* |
| Control Technology | BACT \* | BACT \* |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments  AQRV analysis (Federal Majors) | NAAQS and PSD Increments  AQRV analysis |
| NAQB | * Offsets   + 1.1:1 for ozone   + 1.0:1 for other pollutants \*\* and NAQB     - Reduce impacts at majority of receptors; and     - Impacts less than SIL at all receptors   Or   * Growth allowance   Or   * Model below maintenance area limits | * Offsets   + 1.1:1 for ozone   + **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** \*\* **and NAQB**     - **Source plus competing sources since area was designated less than 10% of the NAAQS**   Or   * Growth allowance   Or   * Model below maintenance area limits |
| Additional Impacts | Additional impacts analysis (Federal Majors) | Additional impacts analysis |
| Alternatives Analysis | n/a | n/a |
| Certify Compliance | n/a | n/a |
|  | **Source Emissions after the PSEL increase SER to 99 tons per year** | |
| Source Classification | Major | Minor |
| Preconstruction Monitoring | Preconstruction Monitoring \*\*\* |  |
| Control Technology | BACT \* | BACT \* |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments  AQRV analysis (Federal Majors) | NAAQS and PSD Increments |
| NAQB | * Offsets   + 1.1:1 for ozone   + 1.0:1 for other pollutants \*\* and NAQB     - Reduce impacts at majority of receptors; and     - Impacts less than SIL at all receptors   Or   * Growth allowance   Or   * Model below maintenance area limits | * Offsets   + 1.1:1 for ozone   + 1.0:1 for other pollutants \*\* and NAQB     - Reduce impacts at majority of receptors; and     - Impacts less than SIL at all receptors   Or   * Growth allowance   Or   * Model below maintenance area limits |
| Additional Impacts | Additional impacts analysis (Federal Majors) |  |
| Alternatives Analysis | n/a | n/a |
| Certify Compliance | n/a | n/a |
|  | **Source Emissions after the PSEL increase less than SER** | |
| Source Classification | Minor | Minor |
|  | NC rules or ACDP | NC rules or ACDP, no change |

\* If a Major Modification is involved

\*\* Offset ratio varies for certain areas such as Medford PM10, etc.

\*\*\* If impacts are greater than the Significant Monitoring Concentration

***Attainment Areas***

| **Program Elements** | **Current Requirements** | **Proposed Requirements** |
| --- | --- | --- |
|  | **Source Emissions after the PSEL increase 100/250 tons per year or more** | |
| Source Classification | Federal Major | Federal Major |
| Preconstruction Monitoring | Preconstruction monitoring \*\*\* | Preconstruction monitoring \*\*\* |
| Control Technology | BACT \* | BACT \* |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments  AQRV Analysis | NAAQS and PSD Increments  AQRV Analysis |
| NAQB | n/a | n/a |
| Additional Impacts | Additional impacts analysis \* | Additional impacts analysis \* |
| Alternatives Analysis | n/a | n/a |
| Certify Compliance | n/a | n/a |
|  | **Source Emissions after the PSEL increase SER to 99/249 tons per year** | |
| Source Classification | Minor | Minor |
| Preconstruction Monitoring | n/a | n/a |
| Control Technology | n/a | n/a |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments | NAAQS and PSD Increments |
| NAQB | n/a | n/a |
| Additional Impacts | n/a | n/a |
| Alternatives Analysis | n/a | n/a |
| Certify Compliance | n/a | n/a |
|  | **Source Emissions after the PSEL increase less than SER** | |
| Source Classification | Minor | Minor |
|  | NC rules or ACDP | NC rules or ACDP, no change |

\* If a Major Modification is involved

\*\* Offset ratio varies for certain areas such as Medford PM10, etc.

\*\*\* If impacts are greater than the Significant Monitoring Concentration

Sustainment Comparison to Attainment and Nonattainment

| **Program Elements** | **Attainment** | **Sustainment** | **Nonattainment** |
| --- | --- | --- | --- |
|  | **Source Emissions after the PSEL increase 100/250 tons per year or more** | | |
| Source Classification | Federal Major | Federal Major | **Federal** Major |
| Preconstruction Monitoring | Preconstruction monitoring \*\*\* | Preconstruction monitoring (required) | n/a |
| Control Technology | BACT \* | BACT \* | LAER \* |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments  AQRV Analysis | NAAQS and PSD Increments  AQRV Analysis | AQRV analysis |
| NAQB | n/a | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** |
| Additional Impacts | Additional impacts analysis \* | Additional impacts analysis \* | n/a |
| Alternatives Analysis | n/a | n/a | Alternative sites analysis \* |
| Certify Compliance | n/a | n/a | Certify compliance for all sources \* |
|  | **Source Emissions after the PSEL increase 100 to 99/249 tons per year** | | |
| Source Classification | Minor | Federal Major | **Federal** Major |
| Preconstruction Monitoring | n/a | Preconstruction monitoring (required) | n/a |
| Control Technology | n/a | BACT \* | LAER \* |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments | NAAQS and PSD Increments  AQRV Analysis | AQRV analysis |
| NAQB | n/a | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** |
| Additional Impacts | n/a | Additional impacts analysis \* | n/a |
| Alternatives Analysis | n/a | n/a | Alternative sites analysis \* |
| Certify Compliance | n/a | n/a | Certify compliance for all sources \* |
|  | **Source Emissions after the PSEL increase SER to 99 tons per year** | | |
| Source Classification | Minor | Minor | **Minor** |
| Preconstruction Monitoring | n/a | n/a | n/a |
| Control Technology | n/a | **BACT** \* | **BACT** \* |
| AQ Analysis-NAAQS/Increments/  AQRV | NAAQS and PSD Increments | NAAQS and PSD Increments | n/a |
|  |  | OR |  |
| NAQB | n/a | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** |
| Additional Impacts | n/a | n/a | n/a |
| Alternatives Analysis | n/a | n/a | n/a |
| Certify Compliance | n/a | n/a | n/a |
|  | **Source Emissions after the PSEL increase less than SER** | | |
| Source Classification | Minor | Minor | Minor |
|  | NC rules or ACDP | NC rules or ACDP, no change | NC rules or ACDP, no change |

Reattainment Comparison to Nonattainment and Maintenance

| **Program Elements** | **Nonattainment** | **Reattainment** | **Maintenance** |
| --- | --- | --- | --- |
|  | **Source Emissions after the PSEL increase 100/250 tons per year or more** | | |
| Source Classification | **Federal** Major | Federal Major | Federal Major |
| Preconstruction Monitoring | n/a | n/a | Preconstruction Monitoring \*\*\* |
| Control Technology | LAER \* | LAER \* | BACT \* |
| AQ Analysis-NAAQS/Increments/  AQRV | AQRV analysis | AQRV analysis | NAAQS and PSD Increments  AQRV analysis |
| NAQB | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** \*\* **and NAQB**   **Source plus competing sources since area was designated less than 10% of the NAAQS**  Or   * Growth allowance   Or   * Model below maintenance area limits |
| Additional Impacts | n/a | Additional impacts analysis | Additional impacts analysis |
| Alternatives Analysis | Alternative sites analysis \* | Alternative sites analysis \* | n/a |
| Certify Compliance | Certify compliance for all sources \* | Certify compliance for all sources \* | n/a |
|  | **Source Emissions after the PSEL increase 100 to 99/249 tons per year** | | |
| Source Classification | **Federal** Major | Federal Major | Federal Major |
| Preconstruction Monitoring | n/a | n/a | Preconstruction Monitoring \*\*\* |
| Control Technology | LAER \* | LAER \* | BACT \* |
| AQ Analysis-NAAQS/Increments/  AQRV | AQRV analysis | AQRV analysis | NAAQS and PSD Increments  AQRV analysis |
| NAQB | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** | Offsets   * 1.1:1 for ozone * **1.2:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** \*\* **and NAQB**   **Source plus competing sources since area was designated less than 10% of the NAAQS**  Or   * Growth allowance   Or   * Model below maintenance area limits |
| Additional Impacts | n/a | Additional impacts analysis | Additional impacts analysis |
| Alternatives Analysis | Alternative sites analysis \* | Alternative sites analysis \* | n/a |
| Certify Compliance | Certify compliance for all sources \* | Certify compliance for all sources \* | n/a |
|  | **Source Emissions after the PSEL increase SER to 99 tons per year** | | |
| Source Classification | **Minor** | Minor | **Minor** |
| Preconstruction Monitoring | n/a | n/a | n/a |
| Control Technology | **BACT** \* | BACT \* | **BACT** \* |
| AQ Analysis-NAAQS/Increments/  AQRV | n/a | NAAQS and PSD Increments | NAAQS and PSD Increments |
|  |  | OR | OR |
| NAQB | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources**   **Source plus competing sources since area was designated less than 10% of the NAAQS** | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** \*\* **and NAQB**   **Source plus competing sources since area was designated less than 10% of the NAAQS**  Or   * Growth allowance   Or   * Model below maintenance area limits | Offsets   * 1.1:1 for ozone * **1.0:1 for other pollutants, with provision to reduce the ratio if offsets are obtained from priority sources** \*\* **and NAQB**   **Source plus competing sources since area was designated less than 10% of the NAAQS**  Or   * Growth allowance   Or   * Model below maintenance area limits |
| Additional Impacts | n/a | n/a | n/a |
| Alternatives Analysis | n/a | n/a | n/a |
| Certify Compliance | n/a | n/a | n/a |
|  | Source Emissions after the PSEL increase less than SER | | |
| Source Classification | Minor | Minor | Minor |
|  | NC rules or ACDP | NC rules or ACDP, no change | NC rules or ACDP, no change |