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| **NET AIR QUALITY BENEFIT OPTIONS** | | | |
| **No.** | **Option** | **Pro** | **Con** |
| 1 | Keep rules as they are | Most protective, no backsliding; no net increase in emissions to airshed | Unrealistic, sources cannot be permitted |
| 2 | Average all receptors instead of looking at "each and every" receptor | No net increase in emissions to airshed | Shell game |
| 3 | Drop only "the emission increases from the proposed source or modification will result in less than a significant impact level increase at all modeled receptors" part of NAQB (almost impossible to meet) | Still demonstrates some improvement; no net increase in emissions to airshed | Less protective but still limits where offsets can be obtained |
| 4 | 1:1 offsets plus modeling to demonstrate impacts less than SIL at NAA monitoring site (offsets can be used to reduce impact at NAA monitoring site) | Demonstration that the source's impact is less than SIL; no net increase in emissions to airshed | Don't really know if AQ is improving at other receptors |
| 5 | 1:1 offsets with pre-construction monitoring and modeling with new background concentration to prove below NAAQS | Assure that source will not violate NAAQS; no net increase in emissions to airshed; DEQ gets more information on what is going on in NAA | Permitting delayed by at least 1 year; added cost to permitting; monitor could show exceedance of standard |
| 6 | 1:1.3 (or ?) offsets with post- construction demonstration that source won't cause a new violation of the standard. | Decrease in emissions to airshed; no modeling so faster, cheaper permitting DEQ gets more information on what is going on in NAA | Very risky option; monitor could show exceedance of standard but source is already constructed |
| 7 | 1:1 offsets with increasing offset ratio based on distance between sources (California’s requirement) | Potential decrease in emissions to airshed; no modeling so faster, cheaper permitting | Don't know if offsets provide any NAQB |
| 8 | 1:1 offsets with x% coming from NAA problem sources or 1:1.2 offsets from industrial sources | No net increase or net decrease in emissions; offsets from problem sources provide NAQB; no modeling so faster, cheaper permitting | Difficulty in getting emission reductions that are quantifiable, permanent, and enforceable |
| 9 | 1:1+? offsets, no modeling | Net decrease in emissions to airshed; no modeling so faster, cheaper permitting | Don't know if offsets provide any NAQB |
| 10 | 1:1 offsets; no modeling (EPA’s requirement) | No net increase in emissions to airshed; no modeling so faster, cheaper permitting | Don't know if offsets provide any NAQB |

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| **NET AIR QUALITY BENEFIT OPTIONS** | | | |
| **No.** | **Option** | **Pro** | **Con** |
| 4+8=11 | 1:1 offsets with x% coming from NAA problem sources or 1:1.2 offsets from industrial sources plus modeling to demonstrate impacts less than SIL at all receptors within the NAA or modeling to demonstrate impacts less than the SIL at the NAA monitoring site and less than the increment at all other receptors including competing sources that were constructed after the area was designated NAA. (Offsets can come from any source in the NAA and can be used to reduce source impact at NAA monitoring site and increment receptors) | No net increase or net decrease in emissions; offsets from problem sources provide NAQB; Demonstration that the source's impact is less than SIL; no net increase in emissions to airshed | Difficulty in getting emission reductions that are quantifiable, permanent, and enforceable; Don't really know if AQ is improving at other receptors |