**Issues for Andy Meeting**

09/17/12 Meeting

| **Issue** | **Options** | **PROs** | **CONs** |
| --- | --- | --- | --- |
| Net Air Quality Benefit | * Option 1A: Define NAQB as 1:1 offset ratio for all sources based on CA rules
* Option 1B: Define NAQB as greater than 1:1 offset ratio for all sources
* Option 2: 1A or 1B for non-federal majors and retain current version of NAQB for federal majors sources but eliminate “less than a significant impact level increase at all modeled receptors”
 | * Eliminate “less than a significant impact level increase at all modeled receptors” problem
 | * Backsliding
 |
| “Small” scale local energy project – what is “small?” | * Not needed if we eliminate NAQB
* Energy Facility Siting Council:

The following types of energy facilities must have a site certificate from the Council before construction: * Electric power plants with a [nominal electric generating capacity](http://www.oregon.gov/energy/Siting/Pages/juris.aspx#nominal) of 25 megawatts or more from thermal power or combustion turbines.
 | * Consistent with most other programs
* Emissions ~30 tpy PM2.5
 |  |
| Areas violating NAAQS but not yet designated NAA – where DEQ has determine the background concentration levels are above the standard through monitoring | * Federal Major sources are excluded because that would change the federal PSD program
* For non-federal major sources only in the PSEL rules:
1. Modeling < SIL – done
2. Modeling > SIL:
	1. Offsets ratio of greater than 1:1 (TBD) and at least X% of offsets from sources or activities that are known to contribute the most of the NAAQS exceedance
	2. BACT
	3. Modeling for increment
* Request NAA designation after buy-off from community
 | * Could protect AQ in same way as if EPA had designated area NAA (need attainment plan)
 | * Woodstove problem
 |
| Attainment Plan/Maintenance Plan Bridge (COLLIER) | After 3 years of monitoring showing attainment and continued monitored attainment:* Allow sources to construct under maintenance plan rule requirements before maintenance plan is approved
* Limit to nonattainment non-federal majors (<100 tpy sources)
 | * Promotes economic development
 | * backsliding
 |
| Netting basis for sources that went through PSD before 2001 | * NB
 | * Consistent with intent
 | * No BACT
 |
| Change 40% opacity to 20% and require COMS  | * Leave as is
* Visible emissions from the hog fuel boiler may exceed the general standard of 20% during periods of soot blowing and/or grate cleaning. Periods of excess emissions from soot blowing and/or grate cleaning are limited to not more than 15 minutes in any 8 consecutive hours.
 | * sources happy
* equity
 | * embarrassment
* none
 |
| Delete 3 minute aggregate opacity limit and use 6-minute averages (EPA Method 9) | * Leave as is
 | * Line up standard with reference test method
* Simplifies monitoring conditions in TV permits
 | * Backsliding
* EPA stringency demonstration
 |
| Change 0.2 gr/dscf to 0.10 gr/dscf and add 3 year compliance schedule | * Leave as is
 | * sources happy
 | * embarrassment
 |
| Exempt sources with specific standards from general grain loading/opacity standards- (add more substantive provisions for O&M during startup/shutdown and add provision for source to prove that emissions during startup/shutdown do not violate NAAQS through modeling if necessary to appease EPA) | * Leave as is
 | * Simplifies monitoring conditions in TV permits
* Reduces DEQ workload regarding unavoidable excess emissions
 | * Backsliding
* EPA stringency demonstration (during startup/

shutdown) |
| Splitting Sources – not retroactive | * Same SIC – split NB evenly or proportionately
* 2 different SICs – NB stays with original SIC and cannot be split and the new SIC is a new source
 | * Aligns with majority of past guidance given to sources
* PSD is not avoided
 | * Perceived as detriment to economic development
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