**Issues for Andy Meeting**

09/17/12 Meeting

| **Issue** | **Options** | **PROs** | **CONs** |
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| 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 |