



Sent via: ODEQ Website

August 19, 2015

Oregon Department of Environmental Quality  
Attn: Program Lead  
811 SW 6th Avenue  
Portland, OR 97204-1390

Re: Update Oregon State Implementation Plan for Annual Fine Particulate Matter (PM 2.5) Standard; Amend Definition of National Ambient Air Quality Standards to include PM 2.5; and Address the Interstate Transport of Nitrogen Dioxide (NO<sub>2</sub>), Sulfur Dioxide (SO<sub>2</sub>), Lead (Pb) and Fine Particulate Matter (PM 2.5)

Dear Ms. Cardwell:

The Northwest Pulp and Paper Association (NWPPA) submits the following comments on the Department of Environmental Quality's updates to the PM<sub>2.5</sub> Infrastructure SIP and interstate transport elements of various other SIPs.

NWPPA is a 59 year-old regional trade association representing 13 member companies and 16 pulp and paper mills in Washington, Oregon and Idaho. NWPPA members produce over 8 million tons of paper products each year and provide approximately 12,000 predominantly union-backed jobs that pay an average of more than \$75,000 a year, plus benefits. As one of the largest members of Washington's forest products sector (including private forest lands, sawmills, furniture, wholesaling and ports), pulp and paper mills contribute to a total of approximately 40,000 direct jobs and 107,500 direct, indirect and induced jobs. Because many NWPPA members are located in economically stressed rural communities, these family-wage manufacturing jobs help sustain the local economy, with each mill supporting three to five additional jobs in the community.

On behalf of its members, NWPPA routinely participates in the development air quality rules and has participated in prior SIP rulemakings.

In summary, NWPPA has reviewed the proposal and supports state adoption of the proposed rule changes and submitting the documents for EPA approval. We also submit the attached specific comments for the Department's consideration.

Thank you for the opportunity to comment on this important air quality rule proposal. NWPPA asks that the Department keep NWPPA informed of any changes as both the PM2.5 Infrastructure SIP and interstate transport elements as they are submitted to EPA Region 10 for approval. I can be contacted at 503-844-9540 to answer any questions.

Sincerely,

Kathryn VanNatta

Director of Government and Regulatory Affairs  
Northwest Pulp and Paper Association

cc: NWPPA Members

## NWPPA COMMENTS

*Update Oregon State Implementation Plan for Annual Fine Particulate Matter (PM 2.5) Standard; Amend Definition of National Ambient Air Quality Standards to include PM 2.5.*

1. NWPPA supports adoption as proposed of Oregon Administrative Rule 340-200-0040(2).
2. NWPPA supports adoption as proposed of Oregon Administrative Rule 340-202-0060(3).
3. NWPPA supports adoption as proposed of Oregon Administrative Rule 340-250-0030(22).

*Attachment B: Infrastructure State Improvement Plan Submittal for Purposes of Clean Air Act Sections 110(a)(1) and (a)(2) for the 2012 Particulate Matter 2.5 National Ambient Air Quality Standard, May 12, 2015.*

4. NWPPA supports adoption of the proposed elements of the PM2.5 Infrastructure SIP taken as an overall package.

*Attachment C: Oregon State Implementation Plan Revision Addressing the Interstate Transport of Nitrogen Dioxide, Sulfur Dioxide, Lead and Fine Particulate Matter, Clean Air Act Section 110(a)(2)(D), May 12, 2015*

5. NWPPA supports adoption as proposed of *Section III, Air Quality Data and Attainment Status within Oregon and Surrounding States.*
6. NWPPA supports adoption as proposed of *Section IV, Nature and Extent of Expected Pollutant Transport.*
7. NWPPA supports adoption as proposed of *Section V, Sources of Pollutant Emissions Near the State Boundary and Expected Impacts in Neighboring States.*
8. NWPPA supports adoption as proposed of *Section VI, Conclusion.* NWPPA agrees with Department's detailed analysis and supports the agency's overall conclusion on page 28 of Attachment C.

In general air pollution from all sources transport across state boundaries. Based on the information described above (Oregon's emissions inventory, air monitoring data and consultation with neighboring state air agencies), DEQ finds

no evidence to suggest that Oregon emission of NO<sub>2</sub>, SO<sub>2</sub>, Pb and PM<sub>2.5</sub> significantly contribute to exceedances or violations of NAAQS, or cause adverse effects in the neighboring states. Additionally, Oregon's PSD program requires NAAQS and visibility analysis for any new or modified industrial sources. In conclusion, Oregon's SIP complies with CAA Section 110(a)(2)(D)(i)(I). The current Oregon SIP contains adequate provisions prohibiting any source or other type of emissions activity within the State from emitting any air pollutant in amounts that will contribute significantly to nonattainment in, or interfere with maintenance by, any other State with respect to any such national primary or secondary ambient air quality standard.

End of NWPPA Comments