

Air Quality Division

Indirect Source Rules Petition Informational Overview

Environmental Quality Commission Meeting
Jan. 24, 2020
Hillsboro, Oregon

Applicable Statute and Rule - Excerpts

**ORS
183.390**

- (1) An interested person may petition an agency to adopt, amend, or repeal a rule...Not later than 90 days after the date of submission of a petition, the agency either shall deny the petition in writing or shall initiate rulemaking proceedings in accordance with ORS 183.335 (Notice).

**OAR
137-001-
0070**

- (1)(a) The rule petitioner requests the agency to adopt, amend, or repeal. When a new rule is proposed, the petition shall set forth the proposed language in full.

Definition

What is an Indirect Source of Air Pollution?

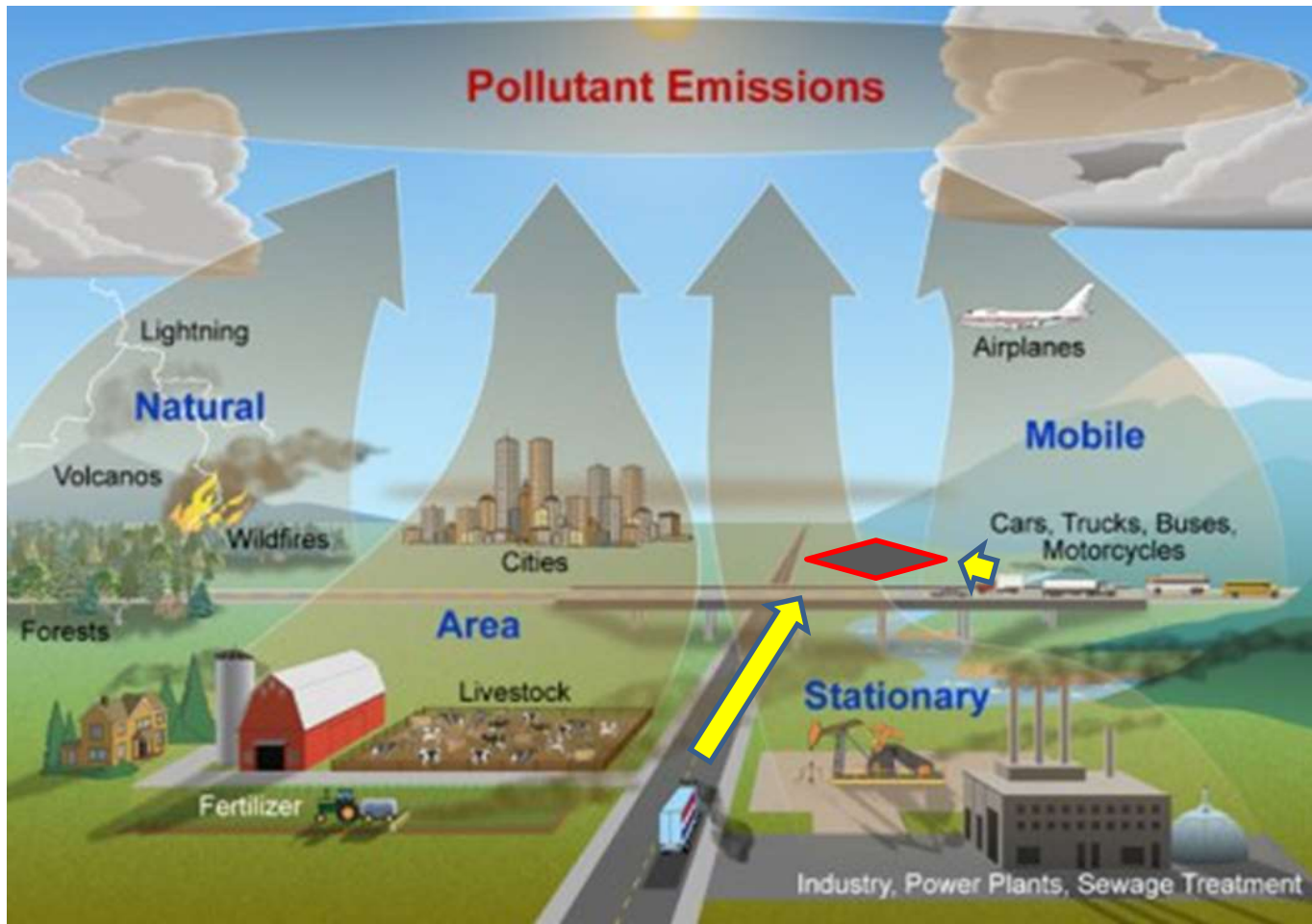


Image credit: National Park Service, 2017, modified by DEQ

The Problem: Attracted Air Pollutants

Particulate Matter
Nitrogen Oxides
Carbon Monoxide

Carbon Dioxide
Methane
Black Carbon

Indirect Source of Air Pollution

Diesel exhaust
Dust
Gasoline exhaust

Background on Indirect Source Regulations

1970s

- Carbon Monoxide Control

1980s

- EPA allows SIP removal

1990s

- Narrowed applicability as air quality improves

Indirect Source Regulation

Current Applicability



CO maintenance areas
with 50,000+ population



More than 1,000 parking
spaces



Likely to exceed a federal
standard?

Petition Elements - Scope

Examples Potential Sources

- Parking Facilities
- Retail Facilities
- Industrial Facilities
- Office Buildings
- Warehouses
- Distribution facilities
- Rail terminals
- Ports
- Marine Terminals

Pollutants Addressed

- All criteria pollutants including:
 - NO_x
 - PM
- CO₂/GHG

Applicability

- Construction
- Operation

Petition Elements – Example Thresholds

Extent

- Building square footage
- Excavation area
- Parking spaces

Emissions

- CO₂/GHG
- NO_x
- PM

Activity or Surrogates

- Vehicle trips
- Contract Cost
- Fuel used

Petition Elements – Requirements

Air Impact Analysis

- Modeling
- Third party verified

Emission Reduction Examples

- Pollution controls
- Alternative fuels

Other measures

- VMT reduction
- Electrification

DEQ Assessment Plan

Estimate Current Pollutant Loading

- Emission Inventory, existing modeled estimates

Estimate Potential Reductions

- Review other state program outcomes, scientific literature

Estimate Regulatory Impact

- Consult DEQ operations and regions

Estimate Resource Needs

- Consult DEQ operations and regions, review other state programs

Consider Public Comment

Resource Implications

Example: San Joaquin Valley Air Pollution Control District

District population	Number technical permit staff	Number Authority to Construct Permits Issued	Indirect Source Reviews Processed
4,148,837	69	2,541	344

Sources: San Joaquin Valley APCD Fiscal Year 2019-20 Recommended Budget; San Joaquin Valley APCD Comprehensive Annual Financial Report Fiscal Year Ended June 30, 2018.

Questions?

What other information would EQC like DEQ to consult?



Scope and Benefits?



Resource Requirements?



Other?