Introduction to Clean Air Act Permitting (Oregon)

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Air Quality Permit – Why do I need one?

- National Ambient Air Quality Standards
- Primary
  - Ambient air quality standards designed to protect public health with an adequate margin for safety.
- Secondary
  - Ambient air quality standards designed to protect public welfare from adverse effects.
  - Takes into account soils, water, crops, vegetation, property, anthropogenic materials, animals, weather, and visibility.

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Air Quality Permit – Why do I need one?

- Oregon Rules and/or Statutes require you to hold a permit
- Allows you to operate your facility
- Helps you stay in compliance with rules
- Some requirements are site specific and must be put in a permit

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Basic Permit

- Simplified annual reporting
- No PSEL
- Low fees
- 10 year duration

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General Permit

- Facility operations must be addressed by general permit conditions
- Generic PSELs
- 10 year duration

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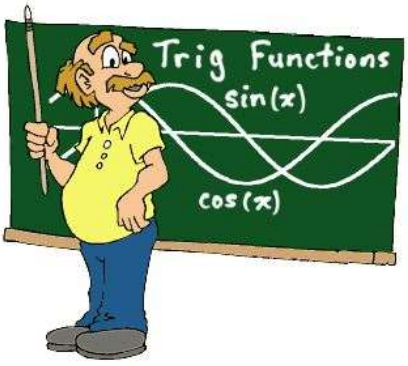
Simple Permit

- Minimal source complexity
- Generic PSEL
- 5 year permit duration



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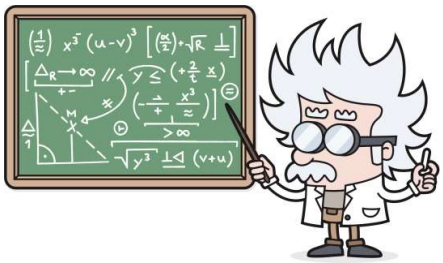
Standard Permit

- Complex rule requirements
- Complex compliance determination methods
- Source wants to maintain netting basis
- Source specific or Generic PSEL
- 5 year duration



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Title V Permit

- Emit >100 tpy criteria pollutants
- Single HAP emissions > 10 tpy
- Combined HAP emissions > 25 tpy
- Can be VERY Complicated

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Air Quality Permit – Do I need one?

- OAR 340-216-8010, Table 1
- List of Activities and Sources that require a Permit
  - Part A: Basic ACDP
  - Part B: General, Simple, or Standard ACDP
  - Part C: Standard ACDP
- Applicability based on Activity
- Part B, 85 based on uncontrolled emissions

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Plant Site Emission Limit (PSEL)

- A federally enforceable limit on a plants potential-to-emit.
- Established based on emissions estimates presented in your application

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Why are AQ Permits Important?

- ACDPs protect the ambient air quality.
- Help a source to demonstrate compliance with applicable state and federal regulations.
  - Interpret regs and put them in easy-to-follow conditions.
- Allow the public the opportunity to comment on activities that affect their environment.

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Why are AQ Permits Important?

- A permit is the “Tool for Compliance”
  - Permits are written such that compliance with each permit condition demonstrates compliance with applicable regulations
  - Details what testing and recordkeeping is required
  - At inspection time, the source will be tested on its contents!
  - Ignorance is not an excuse

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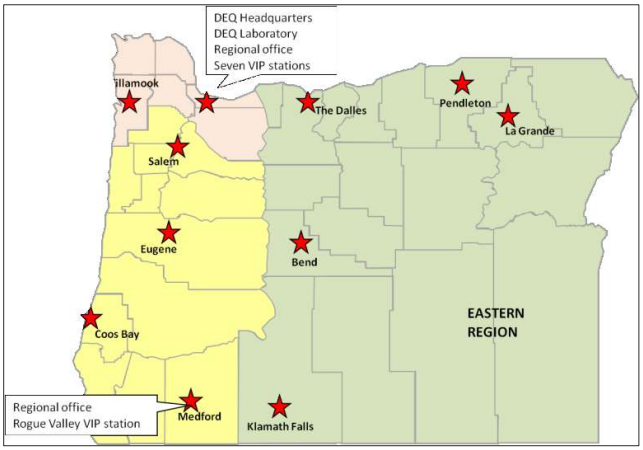
Who Do I Work With?

- Northwest Region (Portland)
  - Main Line: 503-229-5696
- Eastern Region (Bend)
  - Main Line: 541-388-6146
- Western Region (Salem)
  - Main Line: 503-378-8240
- LRAPA
  - Main Line: 541-736-1056



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Air Quality Permit - Applying

- We have an Application Guidance Document!
  - Guidance for all permit types
- Forms are available on DEQ's website
  - http://www.Oregon.gov/deq/
- Land Use Compatibility Statement
  - Required for new sources and some modifications
  - Contact the Planning Department in the City or County where the project is located

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Air Quality Permit - Applying

- Pre-application Meeting
  - DEQ is willing to meet prior to submitting an application
  - Discuss Project and Timelines
  - Provides Clarity in the Application Process

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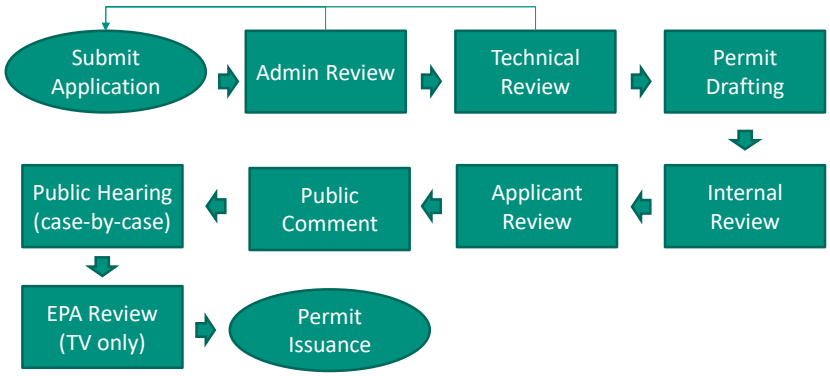
Permitting Process



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So You Have an ACDP!

- Stay below your Plant Site Emission Limits
- Read your permit and ask questions early
- Keep a copy on-site
- Review for actions that must be taken:
  - Monitoring
  - Record Keeping
  - Reporting

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IMPORTANT!!!!

- Read your permit!
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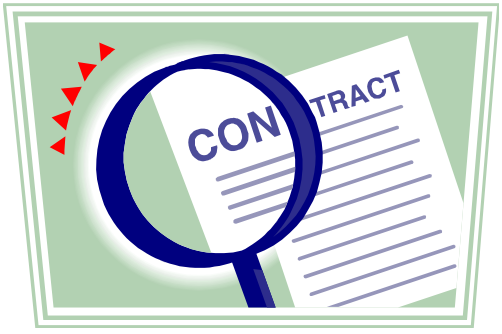

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Questions?

Graiver.David@deq.state.or.us
503-229-5690

OR

503-229-5696
Ask for Air Quality Duty Officer

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