Lane Regional Air Protection Agency (LRAPA)

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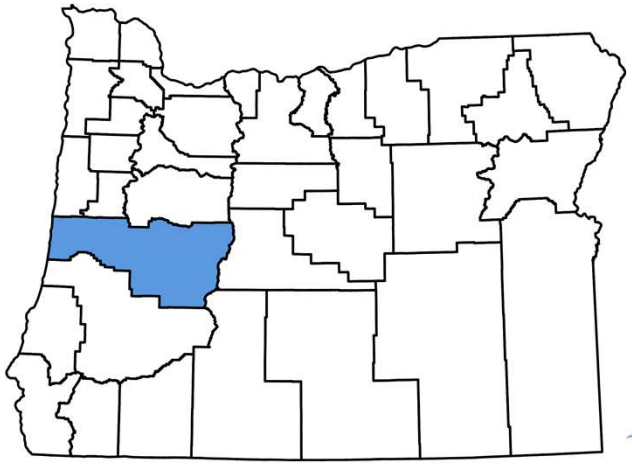

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LRAPA History

- Created in 1968
- Achieve and maintain clean air consistent with local priorities and goals
- Enhance air quality through a combination of regulatory and non-regulatory programs and activities
- Program elements
  - Air quality permitting
  - Air quality monitoring of criteria pollutants and air toxics
  - Outdoor burning
  - Home wood heating
  - Asbestos

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LRAPA/ODEQ - Similarities

- Air quality permitting rules are basically the same
  - Definitions
  - ACDP regulations
  - Title V
  - New Source Review
  - Cleaner Air Oregon
  - Enforcement Penalty Matrices
  - Guidance documents
  - Application forms

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LRAPA/ODEQ - Differences

- Part A: Basic ACDP – Title 37

Category	LRAPA	ODEQ
Boilers and Other Fuel Burning Equipment	≥2.0 and <10 MMBtu/hour (boilers and other fuel-burning equipment)	≥10 and <30 MMBtu/hour (boilers only)
Surface Coating Operations	<250 gallons/month and >250 gallons/year	>250 gallons/month and ≤3,500 gallons/year
Source Not Elsewhere Classified	> 1 ton/year VOC and or HAP	Not Applicable
Woodworking (Sawmills, Millwork, etc.)	5,000><25,000 board feet/max 8 hour finished product	Not Applicable
Coffee Roasting	<30 tons/year	Not Applicable
Motor Vehicle Surface Coating	Subject to an area source NESHAP, <20 gallons/year, and not registered	>25 autos/year in Portland AQMA

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LRAPA/ODEQ - Differences

- Part B: General, Simple and Standard ACDP

Source Category	LRAPA	ODEQ
RACT Source Categories	Not Applicable	8 Source Categories that Reference OAR 340-232
Boilers and Other Fuel Burning Equipment	>10 MMBtu/hour	>10 MMBtu/hour with exceptions for exclusively NG and propane
Ethylene Oxide Sterilizers	Commercial or institutional, no exceptions	Commercial with 1 ton exception Hospitals subject to area source NESHAP
Galvanized Pipe and Coating	No exceptions	Exception for <100 tons of zinc/year
Gasoline Dispensing Facilities	No exceptions	Subject to an NSPS or NESHAP

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LRAPA/ODEQ - Differences

- Part B: General, Simple and Standard ACDP (Continued)

Category	LRAPA	ODEQ
Metal Fabrication and Finishing	Subject to a NESHAP	Subject to a NESHAP, includes exceptions
Motor Vehicle and Mobile Equipment Surface Coating Operations	Subject to an area source NESHAP, >20 gallons/year, and not registered	Subject to an area source NESHAP, includes exceptions
Paint Stripping and Misc. Surface Coating	Subject to an area source NESHAP	Subject to an area source NESHAP, includes exceptions
Surface Coating Operations	>250 gallons/month, excluding sources using exclusively non-VOC/HAP coatings	Actual emissions before controls of ≥10 TPY

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LRAPA/ODEQ - Differences

- Part B: General, Simple and Standard ACDP (Continued)

Category	LRAPA	ODEQ
Wood Preserving	Including waterborne with >1 TPY VOC or HAP emissions	Excluding waterborne
Generic – Subject to RACT, BACT, LAER, NESHAP, NSPS, or state MACT	Not Applicable	Applicable with exceptions
Fiberglass Lay-up and/or Reinforce Plastic Composites Production	Applicable	Not Applicable

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LRAPA/ODEQ - Differences

- General ACDP

LRAPA	ODEQ
Fiberglass Lay-Up and/or RPC Production	Clay Manufacturing
	Gasoline Dispensing Facilities (Stage 2)
	Grain Elevators ≥ 10,000 TPY
	Hospital Ethylene Oxide Sterilizers
	Metal Fabrication & Finishing (small)
	Paint & Allied Product Manufacturing
	Prepared Feeds/Cereal/Flour ≥ 10,000 TPY
	Seed Cleaning ≥ 5,000 TPY
	Wood Preserving

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LRAPA/ODEQ - Differences

- Permitting Fees

Fee Type	LRAPA	ODEQ
ACDP Fees	Increase each year on July 1 by 4%	Determined by statute
GHG Fees	Same as ODEQ	12.5% of annual ACDP fee
CAO Fees	Same as ODEQ	Determined by statute
Title V Fees	Same as ODEQ	Determined by statute
Specific Registration Fees	GDFs subject to area source NESHAP not required to otherwise obtain permit Registered motor vehicle surface coating operations Registered dry cleaners using perchloroethylene	Registered motor vehicle surface coating operations Registered dry cleaners using perchloroethylene

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LRAPA/ODEQ - Differences

- ACDP/Title V Permitting Fees

LRAPA	ODEQ
Application fees due once an application is deemed complete	Application fees due upon submittal of the application

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LRAPA/ODEQ - Differences

- Emission Limitations

Limitation	LRAPA	ODEQ
Visible Emissions	Aggregate of 3 minutes in any one hour	6-minute block average

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LRAPA/ODEQ - Differences

- Enforcement Actions

LRAPA	ODEQ
Notice of Non-compliance (NON)	Warning Letter (WL)
	Pre-Enforcement Notice (PEN)
Notice of Permit Violation (NPV)	Notice of Permit Violation (NPV)
Notice of Civil Penalty Assessment (NCP)	Notice of Civil Penalty Assessment and Order
Board or Director Order or Stipulated Final Order (SFO)	Commission or Department Order or Mutually Agreement and Order (MAO)
	Final Order and Stipulate Penalty Demand Notice

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LRAPA – Special Consideration Areas

- Eugene / Springfield Urban Growth Boundary
  - Maintenance area for carbon monoxide
  - Maintenance area for PM_{10}
- Oakridge Urban Growth Boundary
  - Nonattainment for PM_{10}
  - Nonattainment for $PM_{2.5}$

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Questions and Contact Information

Max Hueftle
Permit Section Manager
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
541-736-1056, ext. 231
max@lrapa.org

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