Cleaner Air Oregon Implementation:

Challenges and Opportunities

Oregon Department of Environmental Quality
NW Environmental Expo
December 2019

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Implementation is HAP-pening

- 9 permitted facilities have been called into the program to complete a health risk assessment
- DEQ working with over 10 new facility applicants
  - 1 issued permit, one out for public comment
  - 5+ risk assessments approved (Levels 1-3)
  - All present low health risks

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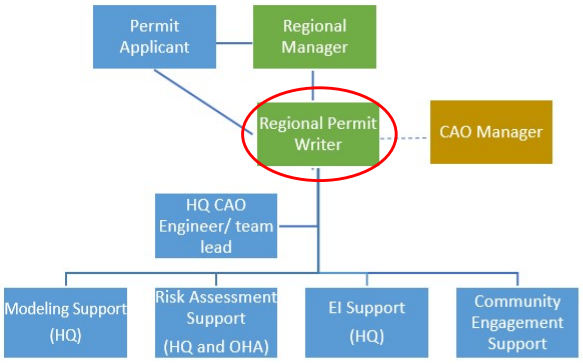
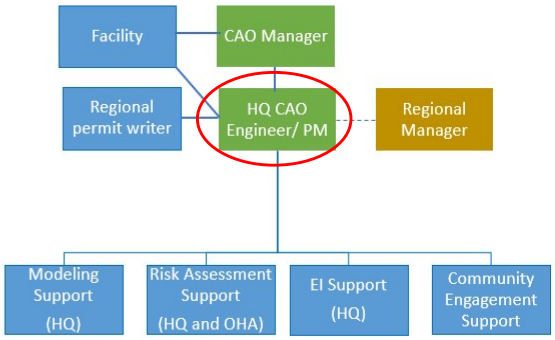
Integrating CAO and Permitting

New Facility Permitting



Existing Facility Call in



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Program Status

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Timelines, Submittals and Approvals Matter

- Submittal approved (with or without comments/ conditions)
- Changes requested, with timeline
- DEQ amends submittal and approves as amended
- (Enforcement)

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Communication Matters

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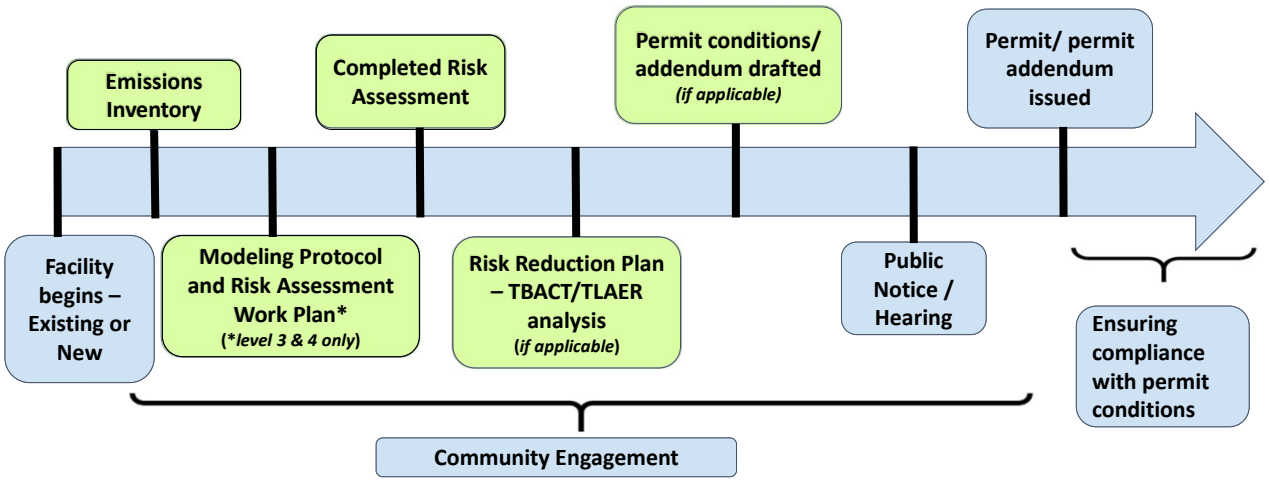
CAO Permitting Process



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Pounds Matter

Stack/Fugitive Information		Activity Information								
				Annual - Chronic [units/year]			Max Daily - Acute [units/day]			
Emission Type (e.g. Point or Fugitive)	Stack or Fugitive ID	Units (e.g. hours operation, tons material, gallons)	Description/Type	Actual	Requested PTE	Capacity	Actual	Requested PTE	Capacity
Point	ST-1	tons	Input Material X	100	140	200	0.3	0.5	0.8

More detailed production information required:

- Annual and Acute activity levels and/or EF values
- Actual, Requested PTE, and/or Capacity activity levels
- *Supporting information needed for review and approval*

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Emission Factors and Source Testing Matter

Emission Factors

- Data required on larger set of pollutants
- May not be good available data
- DEQ must approve EF values, required for compliance determinations

Source Testing

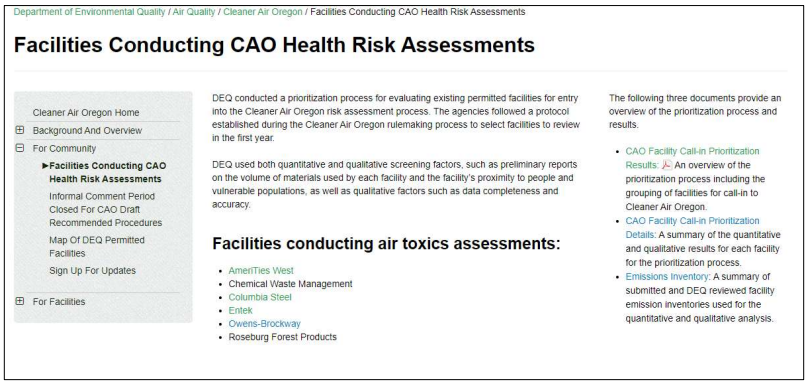
- There will likely be more testing required than in the past
- Existing source test data may be insufficient to address CAO needs
- Testing will need to capture activity with maximum risk
- Testing to demonstrate compliance with EF values

Source Risk/Emissions Limits and Permit Conditions

- Source Risk Limits can be based on:
  - Level modeled in the risk assessment; or
  - Projected operations
- Permit conditions may be added to address:
  - Emission parameters or limitations
  - Activity levels – acute or chronic
  - Operational Parameters
- *De Minimis* source determination-what it means, what it may not mean

Engaging Communities

- Greater interest in details
- Flexible based on site and requests
- Developing Best Practices document
- Knowledge and communication builds confidence and trust



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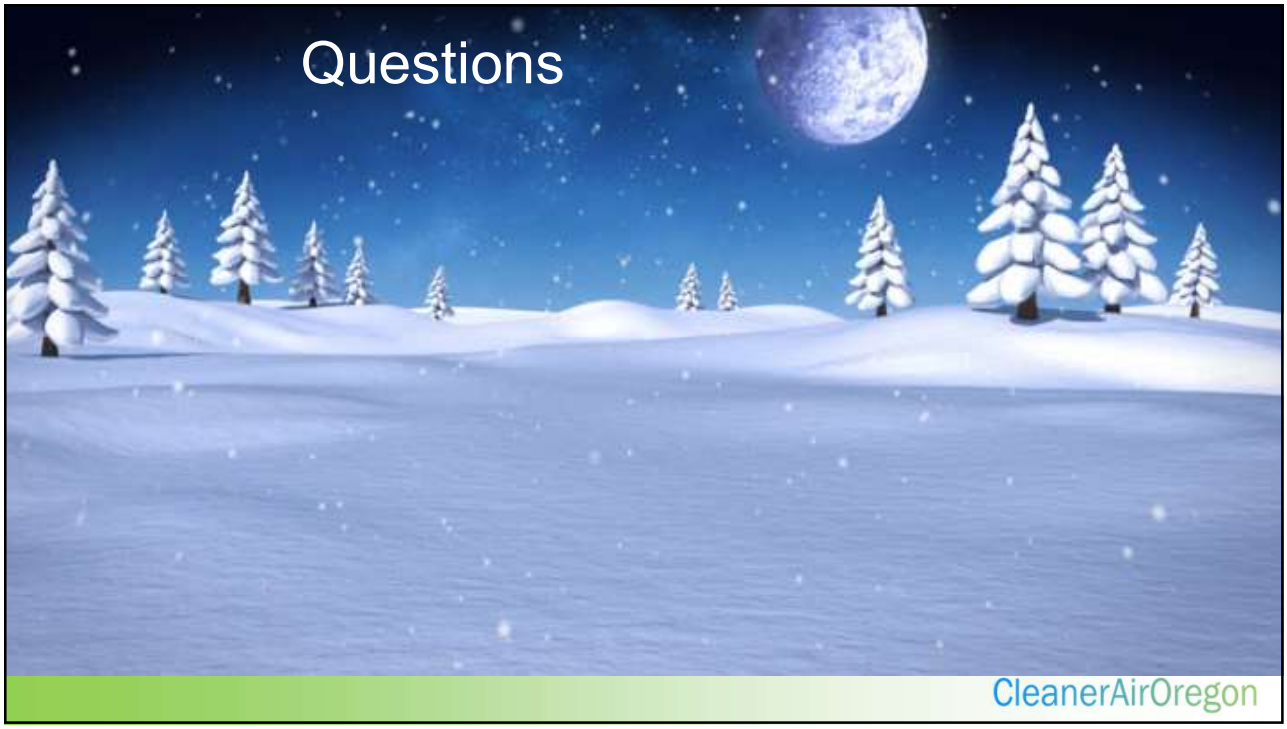

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