



Internal Management Directive

Subject:		IMD Number:	
PM _{2.5} True-Up		AQ-00-0015	
Effective Date:	August 10, 2011	Pages:	3
Revision Date:			
Approval:	 Andrew Ginsburg - Air Quality Administrator		

Intent / Purpose / Statement of Need:

This Internal Management Directive describes the procedure DEQ will use to establish an initial PM_{2.5} netting basis for previously permitted sources requiring a netting basis adjustment of up to 5 tons to avoid retroactive violations due to exceedance of the PM_{2.5} significant emission rate.

Directive to Air Quality Permit Writers:

This directive applies to Air Quality permit writers who are establishing an initial PM_{2.5} netting basis for sources that have a PM₁₀ Plant Site Emission Limit 10 to 14 tons greater than their PM₁₀ netting basis. Mostly, this directive applies to permitting sources with a Generic PSEL for PM₁₀ and no netting basis, but it could also apply to permitting sources with source specific PSELS and a netting basis if their PM₁₀ PSEL is 10 to 14 tons greater than the PM₁₀ netting basis. If these criteria are met, the permit writer may establish a PM_{2.5} netting basis using the “PM_{2.5} true-up” provision in OAR 340-200-0020.

1. First, determine the required PM_{2.5} PSEL for the source using the Instructions for Determining the PM_{2.5} Plant Site Emission Limit and Netting Basis (refer to the ACDP and Title V application forms and instructions for calculating emissions).
2. Next, calculate the PM_{2.5} netting basis by multiplying the PM₁₀ netting basis by the ratio of the PM_{2.5} PSEL to the PM₁₀ PSEL. For sources with no netting basis for PM₁₀, this will result in no netting basis for PM_{2.5}.
3. If the required PM_{2.5} PSEL is greater than the PM_{2.5} netting basis by 10 to 14 tons, the source may request the “true-up”.
4. If a source requests the “true-up”, the PM_{2.5} netting basis will be set according to the equation below:

$$(\text{PM}_{2.5} \text{ netting basis}) = (\text{Required PM}_{2.5} \text{ PSEL}) - (\text{PM}_{2.5} \text{ SER} - 1).$$

5. If the source currently has a Simple ACDP, it must apply for a Standard ACDP in order to establish and maintain a netting basis for PM_{2.5}. If the source has surrendered netting bases for other pollutants in order to qualify for the Simple ACDP, it cannot reestablish those netting bases; it can only establish a new netting basis for PM_{2.5}.

Background:

The rule basis for the “PM_{2.5} true-up” is the definition of Netting Basis in OAR 340-200-0020:

"Netting Basis" means the baseline emission rate MINUS any emission reductions required by rule, orders, or permit conditions required by the SIP or used to avoid SIP requirements, MINUS any unassigned emissions that are reduced from allowable under OAR 340-222-0045, MINUS any emission reduction credits transferred off site, PLUS any emission increases approved through the New Source Review regulations in OAR 340 division 224 MINUS any emissions reductions required by subsection (g) of this section.

(a) A netting basis will only be established for regulated pollutants subject to OAR 340 division 224 as specified in the definition of regulated pollutant.

(b) The initial PM_{2.5} netting basis and PSEL for a source that was permitted prior to May 1, 2011 will be established with the first permitting action issued after July 1, 2011, provided the permitting action involved a public notice period that began after July 1, 2011.

(A) The initial netting basis is the PM_{2.5} fraction of the PM₁₀ netting basis in effect on May 1, 2011. DEQ may increase the initial PM_{2.5} netting basis by up to 5 tons if necessary to avoid exceedance of the PM_{2.5} significant emission rate as of May 1, 2011.

PM_{2.5} has been indirectly regulated through PM₁₀ and total particulate matter for years. Because of this, DEQ is adding PM_{2.5} to the program in a manner that avoids imposing retroactive violations on sources who have complied with existing permitting requirements for particulate matter. The PM_{2.5} Significant Emission Rate (SER) is 10 tons per year (tpy), while the PM₁₀ SER is 15 tpy. If a source's PM_{2.5} fraction of PM₁₀ is close to or equal to one (meaning that most or all of the PM₁₀ is PM_{2.5}), it is possible for a source to have PM_{2.5} emissions greater than the PM_{2.5} netting basis by more than the SER.

Without a rule provision to address this situation, sources could retroactively violate the air quality analysis requirements of OAR 340-222-0041 or New Source Review requirements. Sources could also be required to satisfy those requirements for any future change, even if emissions did not increase. Subsection (b)(A) of the definition of Netting Basis, referred to as the “PM_{2.5} true-up”, was adopted by the Environmental Quality Commission to avoid this situation. The PM_{2.5} true-up allows DEQ to establish a PM_{2.5} netting basis at the minimum level necessary so that the source's PM_{2.5} PSEL is less than the PM_{2.5} SER over the netting basis.

A source that requires a source-specific PM_{2.5} PSEL greater than the generic level and/or a PM_{2.5} netting basis must have a Standard ACDP or Title V permit. Simple ACDPs cannot have a netting basis or PSEL greater than the generic level. Any source currently on a Simple ACDP that needs to establish a PM_{2.5} netting basis will need to obtain a Standard ACDP.

Applicability:

Plant Site Emission Limits - OAR 340, Division 222

New Source Review - OAR 340, Division 224

Definitions:

Netting Basis - OAR 340-200-0020

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Internal Management Directive:

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