Actual Emissions versus Potential to Emit

Cleaner Air Oregon

REFORMING OREGON'S INDUSTRIAL AIR QUALITY REGULATIONS

Inviting Oregonians to help create new regulations that protect what we all care about: the health of our people and our planet, and the economic vitality of our communities.

August 29th and 30th, 2017
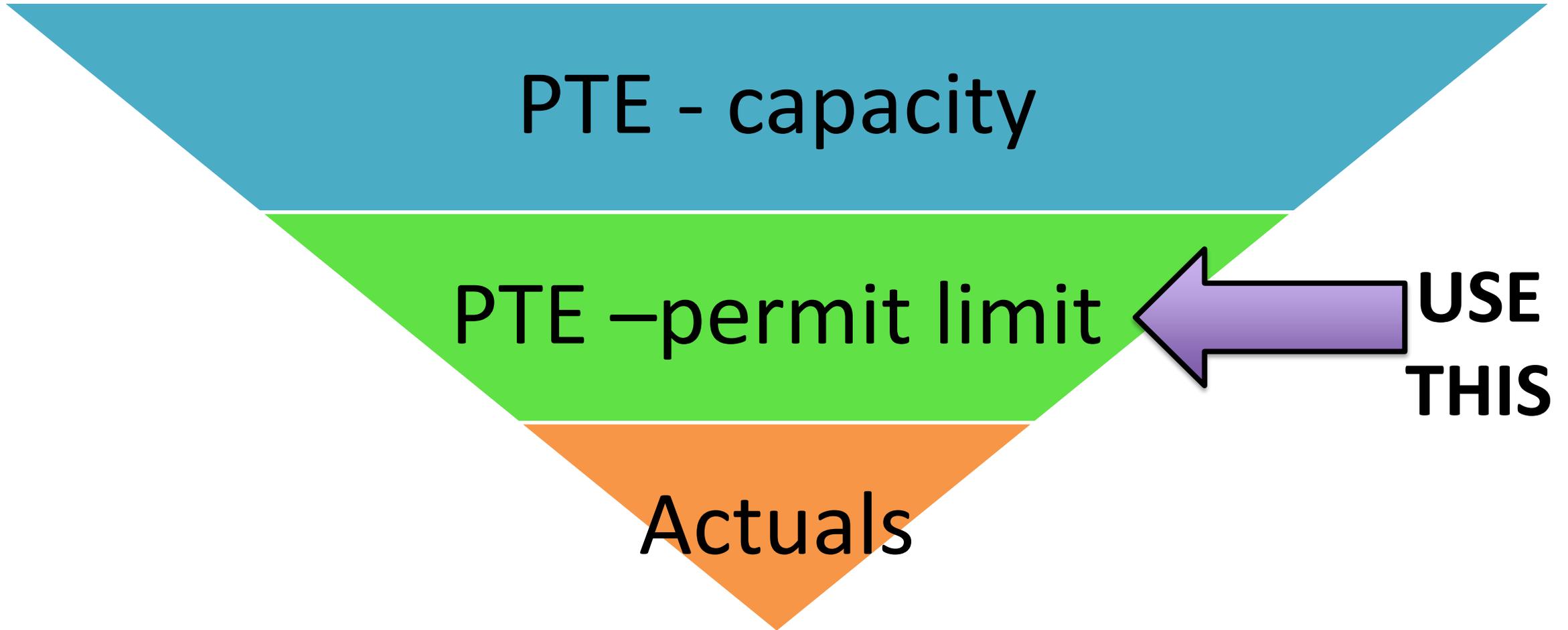
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Actual Emissions versus Potential to Emit

Proposed rule language

(b) If the source is not a de minimis source but the risk from the source at **<emission rate to be determined>** does not exceed any of the applicable Source Risk Action Levels in OAR 340-245-8010 Table 1, the application for a permit attachment under OAR 340-245-0080(5)(c) must be submitted to DEQ no later than 30 days from the DEQ notice date; or
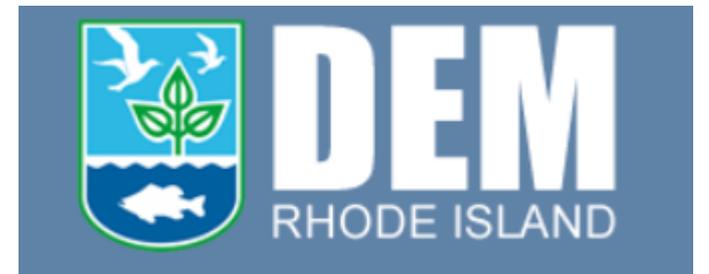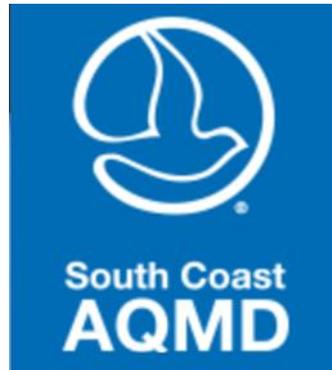
<emission rate to be determined>

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Actual Emissions versus Potential to Emit

PTE - capacity

PTE –permit limit ← **USE THIS**

Actuals

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Actual Emissions versus Potential to Emit

Actual Emissions	Potential to Emit
More accurately represents potential risk	Overestimates risk since PTE is higher than actual emissions
Easier to calculate based on past emissions	May be harder to calculate based on future potential emissions with multiple chemicals/processes
Responds to exceedances after they happen	Protects against future exceedances
More frequent reporting needed to ensure compliance	Less frequent reporting needed because Risk Action Levels probably not exceeded
Others?	Others?

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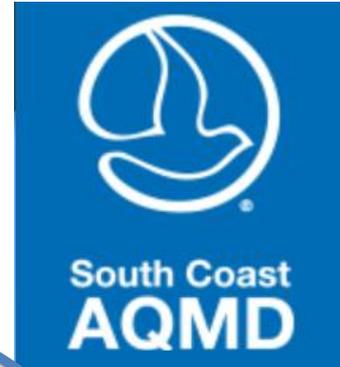
South Coast Air Quality Management District

Permitting Program

- Individual pieces of equipment
- Equipment permits based on **Potential to Emit**
- Equipment limit of 1 in 1 million or 10 in 1 million w/TBACT

Air Toxics 'Hot Spots' Act (AB2588)

- Quadrennial Emissions Inventory of whole facility (**Actual Emissions**)
- Prioritization
- Health Risk Assessment
- Permit required if facility risk is > 25 in 1 million or HI = 3

South Coast AQMD

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\<emission rate to be determined\>

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