

**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY  
OREGON TITLE V OPERATING PERMIT  
ADDENDUM NO. 1**

**SIGNIFICANT PERMIT MODIFICATION AND REOPENING FOR CAUSE  
REVIEW REPORT**

Oregon Title V Operating Permit No. 25-0016-TV-01 issued to Portland General Electric Company in Boardman, Oregon was renewed on December 8, 2010. Addendum No. 1 is being issued in accordance with OAR 340-218-0180 to incorporate the requirements of the Prevention of Significant Deterioration (PSD) permit (Standard ACDP 25-0016-ST-01) issued on December 10, 2010 authorizing installation of new low NO<sub>x</sub> burners and over-fire air system to comply with the Best Available Retrofit Technology (BART) requirements of the regional haze rules. In addition, the regional haze rules (OAR 340, Division 223) were revised on December 9, 2010 so the permit is being reopened for cause in accordance with OAR 340-218-0200(1) to incorporate the new requirements. The permit is revised as follows:

**Incorporation of Standard ACDP 25-0016-ST 01:**

<b>Standard ACDP Condition</b>	<b>Title V Permit Condition</b>	<b>Comments</b>
1.1 and 1.2	See following conditions	The revised Title V permit allows operation of the new burners and over-fire air system.
1.3	26	Condition 1.3 of the ACDP does not need to be added to the Title V permit because the compliance date for the regional haze rules is 7/1/11, which is less than 18 months from when the Standard ACDP was issued.
2.1	20	Incorporates the Best Available Control Technology (BACT) limit for CO.
3.1 and 3.2	42	Incorporates the revised Plant Site Emission Limit for CO.
4.1	45	Incorporates the CO compliance testing requirement.
4.2	55	Incorporates the CO compliance monitoring requirement.
4.3	60	Incorporates the CO PSEL monitoring requirement.
5.1	61 through 64	The general recordkeeping requirements are already included in the Title V permit.
5.2	65.a	Incorporates recordkeeping requirements for continuous emissions monitoring systems (CEMS).
6.1	73 through 76	The general reporting requirements are already included in the Title V permit.
6.2	78	Incorporates the initial compliance reporting requirement.
6.3	79	The annual report requirement is already included in the Title V permit.

Standard ACDP Condition	Title V Permit Condition	Comments
6.4	77	Incorporates the initial notification requirement.
6.5	G16	The requirement to notify DEQ of a change in ownership or company name is already in the Title V permit.
7.1	---	The requirement to submit an application to modify the Title V permit has been satisfied.
7.2 and 7.3	General reporting requirement section of the Title V permit	The address of the DEQ office is already included in the Title V permit.
8.1 through 8.4	G13	The ACDP fee requirements are replaced with the Title V fee requirements.
9.1 through 9.1	G1 through G29	The ACDP general requirements are replaced with the Title V general requirements.

**Reopening for Cause:**

Regulation	Title V Permit Conditions	Comments
OAR 340-223-0030	26 - 31	The revised rules include emission limits for NO <sub>x</sub> and SO <sub>2</sub> and closure of the plant by 12/31/20.
OAR 340-223-0050	32	The revised rules include an option to comply with the rules adopted in 2009 if EPA does not approve the rules adopted in 2010. In addition, the revised rules retain the option to close the plant within 5 years after EPA approves the rules and not have to meet the SO <sub>2</sub> emission limit in 2014. These options are incorporated by reference.
OAR 340-223-0060 and 340-223-0070	32, incorporated by reference	These are the rules adopted in 2009 that will be repealed when EPA approves the rules adopted in 2010.
OAR 340-223-0080	32, incorporated by reference	This is the option to close the plant within 5 years after EPA approves the rules and not have to meet the SO <sub>2</sub> emission limit in 2014.
OAR 340-0030(1)(e)	42	The plant site emission limits are revised based on the reductions required by rule.

## **PUBLIC NOTICE**

The new and revised permit conditions were placed on public notice from **February 23, 2011 to March 30, 2011**. The Department held a public hearing on **March 24, 2011** at the Port of Morrow in Boardman. One person attended the hearing but did not provide comments. PGE submitted a comment requesting an extension to August 15, 2011 for completing the installation and certification of the CO continuous monitoring system. The boiler may not resume operations after the annual maintenance outage in time to complete the certification by July 1, 2011. The Department agrees with the request and has revised permit condition 55 accordingly.

A proposed permit will then be sent to EPA for a 45 day review period. The Department may request and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period. If the EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

### **Hearing Details:**

Time: 6:00 pm  
Date: March 24, 2011  
Location:

Port of Morrow  
River Front Room  
2 Marine Drive  
Boardman, OR 97818

Information session begins at 6:00 pm with formal hearing to follow.