



March 19, 2019

Karen Font Williams
Department of Environmental Quality
Air Quality Division
700 NE Multnomah St., Suite 600
Portland, Oregon 97232-5263

Via email: Karen.williams@state.or.us

**Re: Intel Corporation, Ronler Acres Campus, Indirect Source Permit File No. 34-9501-3
Permit Application Supporting Information – ISCP CO NAAQS Evaluation**

Dear Ms. Williams:

As requested in your email dated February 5, 2019, Intel is providing additional supporting information related to the Indirect Source Construction Permit (ISCP) application submitted January 24, 2019. This document provides the requested analysis of the potential to cause or contribute to a violation of the National Ambient Air Quality Standard (NAAQS) for carbon monoxide (CO) and includes links and/or copies of references utilized in developing the analysis.

The Oregon Department of Environmental Quality (DEQ) has requested an analysis of the potential for the additional 7,500 average weekday trips to cause or contribute to a violation of the national ambient air quality standard for carbon monoxide.

The Clean Air Act Amendments of 1990 and the Intermodal Surface Transportation Efficiency Act (ISTEA) of 1991, along with a number of additional federal transportation policies, require a rigorous transportation planning process. The process includes an air quality analysis for all planned transportation improvement projects in any area that is not, or has not been, in compliance with NAAQS. The air quality analysis is called "Transportation Conformity," and is described by the U.S. Department of Transportation (USDOT) as *"...a way to ensure that Federal funding and approval are given to those transportation activities that are consistent with air quality goals. It ensures that these transportation activities do not worsen air quality or interfere with the 'purpose' of the State Implementation Plan (SIP), which is to meet the National Ambient Air Quality Standards (NAAQS)."*

In the Portland Metropolitan area of Multnomah, Clackamas, and Washington Counties, the Transportation Conformity analysis is performed by Metro. For each update to the Regional Transportation Plan (RTP), and to the Metropolitan Transportation Improvement Plan (MTIP), Metro

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estimates air emissions from the tri-county transportation system and compares the emissions against the Motor Vehicle Emissions Budget established by the Oregon CO SIP.

The 2018-2021 MTIP Air Quality Conformity Determination completed by Metro in July 2018 contained the following pertinent information:

- The only pollutant for which the Portland Metropolitan area is an area of concern and required to analyze regional emissions for purposes of transportation conformity is carbon monoxide (CO).
- In 2010, regional CO on-road transportation source emissions were forecast at less than 50% of the Motor Vehicle Emissions Budget on a pounds / winter day basis.
- Forecast CO emissions from motor vehicles are projected to continue to decline until they are less than 25% of the Motor Vehicle Emissions Budget in 2040.
- There have been no exceedances of the 8-hour CO NAAQS in the Portland Metropolitan area since 1989.

Based on the Transportation Conformity Determination, it is reasonable to conclude that the emissions from the transportation system in Metropolitan Portland and the contribution to those emissions from the Intel Ronler Acres site will not cause or contribute to a violation of the CO NAAQS on a regional basis.

Additionally, the 10-Year Portland Area Carbon Monoxide Maintenance Plan included in Oregon's CO SIP was approved by EPA in 2006. This Plan was effective through October 2, 2017, and has since expired. Therefore, as of October 2017, the transportation conformity requirements of 40 CFR Part 93 are no longer required.

Information sources utilized in this analysis include the following:

- *2018-2021 Metropolitan Transportation Improvement Program Joint Air Quality Conformity Determination*, Metro, July 2018
 - This report will be provided via email.
- *Letter dated January 16, 2017 from U.S. EPA Region 10 addressed to Portland Transportation Conformity Interagency Consultation Group*
 - This is provided via email.

If you require additional information or have any questions, please do not hesitate to contact me (Kristine.baranski@intel.com; 503-431-9459) or Stephanie Shanley (stephanie.b.shanley@intel.com; 503-319-6285).

Sincerely,

Kristine D. Baranski

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