



Frequently Asked Questions

NEXT Renewable Fuels

Information DEQ considers as part of its permits.

1. Does DEQ consider data from industrial activity across the river in Washington? How do the states coordinate?

These are state based programs, so they are separate. Federal programs can cross state lines. It is something maybe worth exploring with Washington, who also has an air toxics program, but at this time we look at these as independent.

2. Do you factor in the history of the company in making decisions about protecting the public?

DEQ can evaluate the facility's history of operations in Oregon. In this case, NEXT Renewables has no prior record in Oregon, so DEQ can only evaluate what is being proposed. We expect the company to provide truthful and accurate information for analysis and rigorous evaluation to determine whether the proposed operation can operate within the limits that are protective of public health.

3. How does the recent appeal Columbia Riverkeeper and others filed to the Oregon Land Use Board of Appeals impact DEQ's permit process?

According to DEQ's land-use compatibility rules, listed under [OAR 340-018-0050\(2\)\(a\)\(G\)](#): "If a local government land use compatibility determination or underlying land use decision is appealed subsequent to the Department's receipt of the LUCS [Land Use Compatibility Statement], the Department shall continue to process the action unless ordered otherwise by LUBA or a court of law stays or invalidates a local action."

Any additional land use questions should be addressed to the County or the Land Use Board of Appeals.

4. Will the air quality permit consider the source of the gas, for example if it is fracked?

The air quality permitting process does not look at how the natural gas is sourced. What the air quality permits evaluate are the pollutants created during the natural gas, or other fuel, combustion process that the proposed facility plans to use.

5. How does DEQ account in its air modelling for a tidally influenced community where air travels differently?

The air modeling does account for terrain differences and other factors to the best of its ability, and then that gets comprehended in the modeled concentrations observed along the river at specified exposure locations.

Northwest Region Air Quality

700 NE Multnomah Street, Suite 600, Portland, OR 97232
503-229-5263, Toll-free in Oregon: 800-452-4011



Frequently Asked Questions

NEXT Renewable Fuels

Exposure locations are a way for us to categorize the parts of the community, to account for different exposure assumptions in the risk assessment. For example, a person's home versus where people work. Specifically, an acute exposure location is an area where people may congregate for several hours of a day, up to 24. There are exposure assumptions that go into generating the values of our health standards based on 24 hours versus a residential exposure location, which is where someone would be assumed to be living for 70 years and exposed for 24 hours a day.

6. Will the state restrict carbon dioxide emissions, and if so, will NEXT Renewables be subject to those restrictions?

At this point, there DEQ does not have the authority to restricting carbon dioxide emissions from the proposed facility, because it is not going through the federal New Source Review program. The state New Source Review program does not currently have requirements for greenhouse gases. NEXT Renewables will be subject to the greenhouse gas reporting under Oregon air quality regulations.

7. How many trains are expected to feed the facility? How many ships?

The proposed input is approximately 2.16 million gallons per day of raw oils.

DEQ's Air Quality program issues permits for stationary sources of air contaminant emissions. Trains and marine vessels are mobile sources. Emissions from trains, trucks, and marine vessels that come to or from the NEXT facility are defined in rule as "secondary emissions" [OAR 340-200-0020 (138)]. Secondary emissions are not taken into consideration when assessing a facility's "potential to emit" [OAR 340-200-0020 (100)] and are only considered as part of overall emissions for sources subject to the Major New Source Review provisions of OAR Chapter 340, Division 224. As stated in the review report, the facility is not subject to the Major New Source Review provisions because it is located in an area that is in attainment with all National Ambient Air Quality Standards and the requested plant site emission limits are less than the Federal Major Source threshold of 100 tons per year.

Air Quality permit

8. For the facility's plant site emission limits, does the term "generic levels" apply uniformly across the board and across the state, or are there generic levels specifically related to industrials zoned lands and areas?

Yes, the term "Generic Plant Site Emission Limit" is defined in [OAR 340-200-0020\(72\)](#) and apply across the state.

Northwest Region Air Quality

700 NE Multnomah Street, Suite 600, Portland, OR 97232
503-229-5263, Toll-free in Oregon: 800-452-4011



Frequently Asked Questions

NEXT Renewable Fuels

9. How many tanks are expected and what is their volume?

See table below:

- RD: Renewable Diesel
- RJ: Renewable Jet Fuel
- RN: Renewable Naphtha

Tank ID	Tank Description
ANIFATS1	5.25 MMGal Animal Fats Storage Tank
ANIFATS2	5.25 MMGal Animal Fats Storage Tank
ANIFATS3	5.25 MMGal Animal Fats Storage Tank
CACID1	16,000 Gal Citric Acid Storage Tank
CACID2	16,000 Gal Citric Acid Storage Tank
HCS	630,000 Gal Hydrocarbon Slop Storage Tank
OWS	420,000 Gal Oil Water Separator Slop Tank
RD/RJ1	9.45 MMGal Swing RD/RJ Storage Tank
RD1	9.45 MMGal RD Product Storage Tank
RD2	9.45 MMGal RD Product Storage Tank
RD3	9.45 MMGal RD Product Storage Tank
VEGOIL1	5.25 MMGal Vegetable Oils Storage Tank
VEGOIL2	5.25 MMGal Vegetable Oils Storage Tank
VEGOIL3	5.25 MMGal Vegetable Oils Storage Tank
RN/RJ1	2.1 MMGal Swing RJ/RN Storage Tank
RN/RJ2	2.1 MMGal Swing RJ/RN Storage Tank
RN/RJ3	2.1 MMGal Swing RJ/RN Storage Tank

10. What are the periods of time that the permits cover?

Standard Air Contaminant Discharge Permits are renewed every five years.

11. What is the anticipated timeline for the Air Quality review?

At this point it's still hard to give a decent timeline. DEQ needs to look at all of these processes in parallel, including water quality. And, to the extent possible, we want to try to time them so that, for efficiency sake, everyone can take full advantage of the public engagement process. There is some work that the company is doing, and working very collaboratively and productively with the Agency. At this time we don't have an exact

Northwest Region Air Quality

700 NE Multnomah Street, Suite 600, Portland, OR 97232
 503-229-5263, Toll-free in Oregon: 800-452-4011



Frequently Asked Questions

NEXT Renewable Fuels

time frame, but as we continue to work on the draft permitting documents and/or regulatory decisions, we will be in touch with everyone about the next steps in public engagement.

12. How close to qualifying as a new federal source is this facility?

As a chemical manufacturing plant, the federal major source applicability threshold for criteria pollutants is 100 tons per year for Particulate Matter (total), Particulate Matter 10 microns in size, Particulate Matter 2.5 microns in size, Nitrous Oxide, Carbon Monoxide, volatile organic compounds, or sulfur dioxide. The permit will limit emissions to the following levels:

Pollutant	Limit (tons per year)
PM	27
PM10	27
PM2.5	27
SO2	39
NOx	39
CO	99
VOC	70

With regards to hazardous air pollutants, a major source is defined as a source that has the potential to emit 10 or more tons per year of any individual hazardous air pollutant or 25 tons per year or more of combined hazardous air pollutants. As proposed, the potential to emit for combined hazardous air pollutants is 0.40 tons per year.

13. What happens if a source violates air quality permit standards?

Once a facility gets permitted, if there is a violation of any permit requirement, it will result in a letter of warning or a pre-enforcement notice according to the DEQ Office of Compliance and Enforcement’s rules. The type and scope of the violation dictates what the specific enforcement action will be.

14. Are there toxic air contaminant limits to protect farm crops, such as mint and blueberries?

The majority of the emissions from this facility are volatile in nature, so we anticipate very little deposition from this source. The toxic air contaminant thresholds in the program are meant for human exposure. We do have ways to model deposition from air

Northwest Region Air Quality

700 NE Multnomah Street, Suite 600, Portland, OR 97232
503-229-5263, Toll-free in Oregon: 800-452-4011



Frequently Asked Questions

NEXT Renewable Fuels

emissions, built in to our process that you could model for crops around a source if we think it is an issue.

15. Why is there no air modeling for volatile organic compounds?

The U.S. Environmental Protection Agency's regulatory concern with volatile organic compounds (VOCs) is for their contribution to ground level ozone, and VOCs do not have an explicit EPA concentration standard. Components of VOCs that have health effects, irrespective of their O₃-forming potential, are addressed as toxic air contaminants in the Cleaner Air Oregon program. For NEXT Renewable's contribution to ground-level ozone, VOC emissions were evaluated, together with nitrous oxide emissions, using the EPA-approved Modeled Emission Rates for Precursors method. The analysis showed ground-level ozone concentrations as a result of NEXT Renewables' emissions were less than the EPA Significant Impact Level of one part per billion.

Water Quality permits

16. How often will the stormwater permits need to be renewed?

The construction permit is for the term of the construction project. When the construction project is complete, the applicant will terminate coverage. There are conditions of termination that are required to follow.

DEQ will begin to regulate the facility under the industrial stormwater permit as soon as the construction permit is terminated so there won't be a lapse in coverage. For the industrial permit, once they're assigned and as long as the industrial operation continues, the permittee will maintain coverage. The general permit itself is renewed on a five-year cycle.

17. Do stormwater and wastewater permits have to conform to a general water management plan for the area?

They do not. Each of the stormwater permits, the construction and the industrial, have their own set of conditions that the facility must adhere to during the term of the permit. For the construction permit it would only be for the duration of the construction activity, and for the industrial permit it would be for the duration of the industrial activity, which could be many, many years.

18. Has the mitigation wetland been proposed officially?

Northwest Region Air Quality

700 NE Multnomah Street, Suite 600, Portland, OR 97232
503-229-5263, Toll-free in Oregon: 800-452-4011



Frequently Asked Questions

The Oregon Department of State Lands and the U.S. Army Corps of Engineers are the two lead agencies who assess mitigation ratios and determine how that compensatory mitigation is approved or not. This information is critical to how DEQ determines if those water quality criteria parameters, beneficial uses, etc. are mitigated for or offset. The current compensatory mitigation being proposed is a permittee-responsible on-site mitigation that would essentially be adjacent to the facility that's being proposed.

19. How will DEQ address wastewater issues?

The Port of Columbia County has a wastewater treatment facility already at the Port. When they built and designed it, they wanted it to be an amenity for future tenants at the Port. It doesn't treat all the wastewater that the tenants might generate, but it does treat certain wastewaters. The Port has a land use compatibility statement for their facility, and the particular permit is covering the entire facility. Based on information NEXT Renewables gave to DEQ and the Port, it does appear that the wastewater can be treated to the point where it can be discharged to the Port's system and treated.

Other programs

20. How will air quality actually be monitored beyond the initial assessments? What time period will be used to continue regular monitoring?

Through the Cleaner Air Oregon program, DEQ may require source testing once the facility is built to verify what's coming out of a stack. In addition, NEXT Renewables will use continuous emissions monitoring systems to continually measure nitrous oxide emissions from their larger combustion units. There wouldn't be any specific monitoring expected as part of the permit conditions, but the facility is expected to submit an annual report to DEQ about their emissions.

DEQ's laboratory does ambient air monitoring. It is important to note that ambient air monitoring includes all sources of pollution and would not be attributable to a specific source.

21. What happens if there is a spill?

DEQ's first priority is protecting public health and local cultural and economic resources. Our Emergency Response program would aim to control the spill and keep it from spreading both on the surface, or from getting to groundwater. DEQ has spill response equipment stored around the state, including at the Columbia Pacific Bio Refinery, in one of their warehouses. We have a lot of emergency response equipment within less than a mile of the location and responders that are in Columbia County who know how to use it. We do this pre-planning to ensure we can provide a quick, aggressive and well-coordinated response, and would do what we can to clean things up.

Northwest Region Air Quality Program

700 NE Multnomah Street, Suite 600, Portland, OR 97232
503-229-5263, Toll-free in Oregon: 800-452-4011