

DEQ Public Hearing

Zenith Energy Terminal – Draft Air Quality Permit

May 12, 2025
University of Portland Buckley Center Auditorium

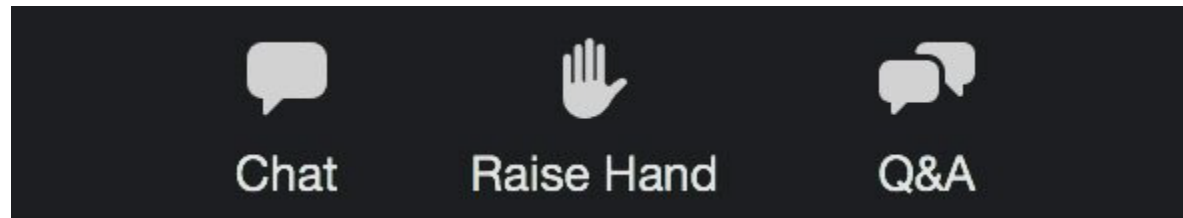
Tonight's agenda

1. Brief housekeeping items, introductions and remarks
2. Draft air quality permit presentation
3. Public comments
 - A. In-person attendees will be invited to provide comments first with our online attendees following, time permitting
 - B. In person attendees who want to provide comment should sign up now if you haven't already done so**

Note: This meeting is being recorded

Using Zoom Webinar

- You should see the following along the bottom of your screen.



- To provide comment, raise your hand when Zoom attendees are invited to provide comment, and the host will un-mute you. (*9 if you're on the phone)
- Note that you will not be able to speak unless the host enables your audio and then you unmute.
- Use chat if you're having technical difficulties.

Why we are here

- Provide information about the draft air quality permit for Zenith Energy's Portland terminal
- Receive verbal public comment
- **Public comment period:** April 7, 2025 – June 15, 2025 at 5 p.m.
 - Verbal and written comments evaluated equally
- DEQ can only consider comments on the draft air quality permit

As always, please speak for yourself and be respectful of others

Draft Air Quality Permit

David Graiver, Air Quality Permit Writer, Northwest Region



State of Oregon
Department of Environmental Quality

What is an Air Contaminant Discharge Permit?

- Regulate stationary source emissions
 - Criteria pollutants
 - Hazardous air pollutants
 - Toxic air contaminants
- Outside the scope of an ACDP
 - Mobile sources
 - Location and land use
 - Off-site production and end use of products



Zenith – What do they do?

- Receives, stores and ships liquid products
- Receipt and shipping
 - Truck, rail, marine vessel, pipeline
- Storage in tanks
- Liquid products
 - Crude, jet fuel, gasoline, diesel
 - Ethanol, renewable/bio diesel, renewable naphtha
- Currently operating under a Title V air quality permit

Zenith – Emission generating activities

- Storage tanks
- Product receipt and shipping
- Combustion – boilers, engines, vapor combustion unit
- Piping/conveyance
- Oil/water separator
- Misc. solvents and chemical use

Changes: Title V to ACDP

New equipment

- Vapor combustion unit
- Loading activities
- Emergency engines

Oregon regulation changes

- 2015: Particulate matter emissions and opacity limits
- 2022: Site specific emission limits
- Fine particulate matter (PM_{2.5}) and greenhouse gases as regulated pollutants

Federal regulation changes

- Engine rules: NSPS III (2006) and NESHAP ZZZZ (2004)
- Gasoline distribution: NESHAP BBBB (2008)

Permit changes: Title V to ACDP

- Plant Site Emission Limits
- Asphalt refinery emission units removed
- Updated storage tank requirements
- Engine requirements
- Vapor combustion unit
 - Source testing
 - Operational and monitoring requirements
- City of Portland's LUCS requirements

Emissions changes: Title V to ACDP

Plant site emission limits

- Volatile organic compounds reduced to 39 tons per year
- Site specific limits
- New regulated pollutants:
 - Fine particulate matter (PM_{2.5})
 - Greenhouse gases

Emission calculation updates

- Updated algorithms for tank emissions
- Source test data (VCU)
- Different materials handled
- Fugitive leaks (e.g., pipe connections)

Emissions changes: Title V to ACDP

Pollutant	Plant Site Emission Limits		
	Previous emission limits (tons/yr)	Proposed emission limits (tons/yr)	Emission limit change (tons/yr)
Total particulate matter	14	None	(14)
Coarse particulate matter	14	None	(14)
Fine particulate matter*	Not regulated	None	--
Carbon monoxide	99	24	(75)
Oxides of nitrogen	77	26	(51)
Sulfur dioxide	81	None	(81)
Volatile organic compounds	179	39	(140)
Greenhouse gases*	Not regulated	29,800	29,800
Hydrogen sulfide	9	None	(9)

* Fine Particulate Matter and Greenhouse gases were not regulated pollutants at the time of the Title V permit issuance

Key changes since 2024 public notice

- Permit includes reference to Feb. 2025 LUCS
- Piping counts moved to Review Report
- Condition 3.5 (product handling restrictions)
 - Moved to Condition 11.3
 - Accounts for sustainable aviation fuel, SAF jet fuel blend and jet fuel
- Allowance of additional engine operation
- Corrections to crude oil handling emission equations
- Described in detail in Paragraph 4 of Review Report

What's next

- **May 15, 2025:** Virtual public hearing
- **June 15, 2025:** Public comment period ends at 5 p.m.
- DEQ will review and respond to all comments prior to issuing a final decision

How to comment

- **All comments are treated equally**
 - Verbally comment at a public hearing
 - Submit written comments:
 - Through Your DEQ Online
 - Email NWRAQPermits@deq.Oregon.gov
 - Mail comments to DEQ at 700 NE Multnomah St, Suite 600, Portland, Oregon 97232
- **Comments from Fall 2024 public comment period**
 - Please resubmit your comments due to changes in the draft permit
 - Comments are not automatically transferred to current public comment period
- **Comments emailed to DEQ between April 9-11, 2025**
 - Please resubmit your comments. DEQ did not receive emails on these dates

Public hearing – in person

- We'll call on you to speak in the order you signed up
- State your first and last name first
 - Include affiliation if you wish
- Keep your comment to the time limit
- We will display slides when you have 1 minute and 15 seconds remaining, and when your time is up

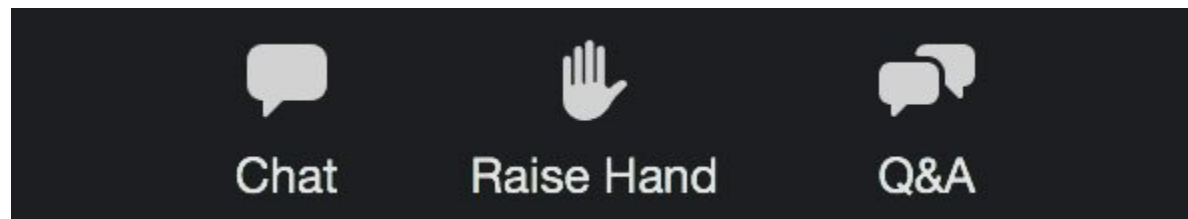
1 minute left

15 seconds left

Please wrap up

Public hearing – Zoom

- Raise your hand to comment
- We'll call folks in the order their hand was raised
- Press *9 if you're listening by phone
- State and spell your first and last name



Thank you!

Next steps:

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Zenith's actual emissions

	PSEL	2020	2021	2022	2023	2024
Particulate matter	14	0.05	0.08	0.09	0.10	0.10
Sulfur dioxide	81	0.03	0.17	0.17	0.19	0.19
Oxides of nitrogen	77	1.94	3.39	3.44	3.89	3.66
Volatile organic compounds	179	25.2	33.0	49.5	43.1	43.2
Carbon monoxide	99	1.63	13.9	5.45	6.09	5.66
Greenhouse gases	N/A	5,747	4,445	4,515	5,103	4,336

All emissions in tons per year

PSEL = Plant Site Emission Limit

Title VI and alternative formats

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