

## **Applicability**

**October 18, 2016**

# Questions on Applicability

Should Oregon include existing sources?



Should Oregon regulate by piece of equipment or the whole facility?



Should Oregon include categorical exemptions?



# What is a source?

“Source” means a ***source of emissions*** and can be:

- An individual piece of equipment (e.g., boiler)
- An entire facility (e.g., pulp mill)



# Program Element 1: New, Modified, Existing

**To adequately protect public health, what sources will Oregon regulate?**

New  
sources?



Modified  
sources?



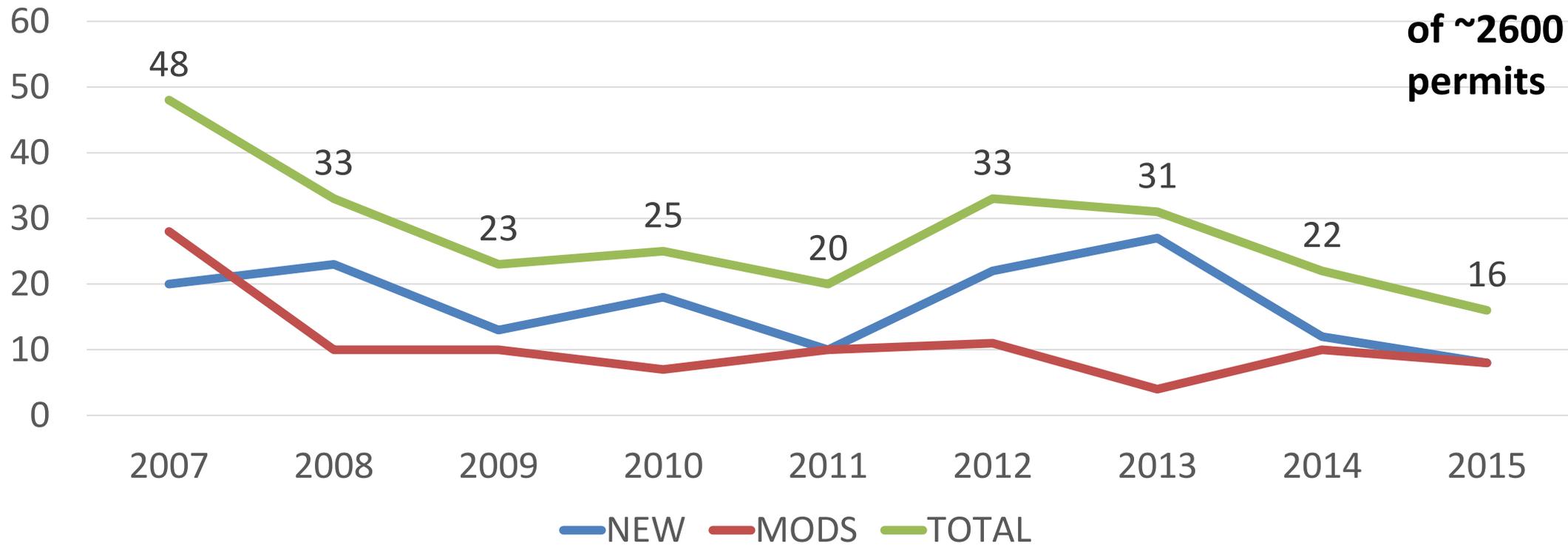
Existing  
sources?



# New/Modified Sources in Oregon

## New/Modified Applications for Simple/Standard/Title V Permits

389 total  
Simple/Standard/  
Title V permits out  
of ~2600 existing  
permits



**Average 700 applications/year for all permit actions**

CleanerAirOregon

# Existing Source Air Permit Categories in Oregon

| Permit Type    | Number      | Examples  |
|----------------|-------------|---|
| Title V Permit | 109         | Pulp mills, steel mills, wood products, power generation, landfills, fiberglass |
| Standard       | 133         | Energy facilities, bio-fuel producers, high-tech manufacturers                  |
| Simple         | 147         | Data centers, bakeries, printers, manufactured homes                            |
| General        | 2083        | Gas stations, dry cleaners, asphalt plants, rock crushers, coffee roasters      |
| Basic          | 104         | Autobody shops, crematories, cabinet shops                                      |
| <b>TOTALS</b>  | <b>2576</b> |   |

# Program Element 1: New, Modified, Existing



Technical Workgroup said regulate existing sources in addition to new/modified sources



Policy Forum said regulate existing sources in addition to new/modified sources

# Program Element 1: New, Modified, Existing

## Potential elements for whether to regulate new/modified/existing sources

The following are potential elements for which DEQ and OHA are seeking additional discussion and input from the Advisory Committee. If there are additional elements not included below, please raise them.

| Potential Elements  |
|---|
| A. Regulate only new and modified sources?  |
| B. Regulate new, modified and existing sources?   |
| C. Regulate new/modified/existing sources and provide incentives to reduce air toxic emissions? |
| D. Regulate sources currently not required to have air permits?                                 |
| E. Placeholder for elements developed by advisory committee members                             |

**APPLICABILITY**

Program Element 1: Include existing sources in program or not? ←

Program Element 2: Regulating individual pieces of equipment or the whole facility

Program Element 3: Categorical exemptions

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# Program Element 2: Equipment or Whole Facility

**Should DEQ and OHA regulate:**



Individual equipment  
or processes?



The whole facility?

# Program Element 2: Equipment or Whole Facility



## **Technical Workgroup said:**

- Regulate whole facility
- New equipment should be regulated differently than existing equipment
- Allow for offsetting or pollution prevention on a facility wide basis

# Program Element 2: Equipment or Whole Facility

## Potential elements for individual pieces of equipment versus the whole facility

The following are potential elements for which DEQ and OHA are seeking additional discussion and input from the Advisory Committee. If there are additional elements not included below, please raise them.

| Potential Elements  |
|---|
| A. Regulate air toxics from new/modified individual pieces of equipment |
| B. Regulate air toxics from new/modified whole facility                 |
| C. Regulate air toxics from existing individual pieces of equipment     |
| D. Regulate air toxics from existing whole facility                     |
| E. Any combination of the above elements                                |
| F. Placeholder for elements developed by advisory committee members     |

## APPLICABILITY

Program Element 1: Include existing sources in program or not?

Program Element 2: Regulating individual pieces of equipment or the whole facility

Program Element 3: Categorical exemptions

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# Program Element 3: Categorical exemptions

**Should some categories be exempted from the program?**



Small storage tanks?



Natural gas/oil boilers?



Rock crushers?

# Program Element 3: Categorical exemptions



## **Technical Workgroup said:**

- Allow for categorical exemptions
- May need an on ramp for extenuating circumstances
- Simplify requirements for exempted sources

# Program Element 3: Categorical exemptions

## Potential elements for including categorical exemptions

The following are potential elements for which DEQ and OHA are seeking additional discussion and input from the Advisory Committee. If there are additional elements not included below, please raise them.

| Potential Elements   |
|--|
| A. Use categorical exemptions from one or all of the programs reviewed in depth                            |
| B. Use categorical exemptions with on-ramps back into the regulatory program for extenuating circumstances |
| C. Evaluate whether DEQ's Title V categorical exemptions list is appropriate to use for air toxics         |
| D. Do not use categorical exemptions   |
| E. Placeholder for elements developed by advisory committee members  |

## APPLICABILITY

Program Element 1: Include existing sources in program or not?

Program Element 2: Regulating individual pieces of equipment or the whole facility

Program Element 3: Categorical exemptions ←

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## Discussion

- Should Oregon include existing sources?  
(page 6)
- Should Oregon regulate by piece of equipment or the whole facility? (page 8)
- Should Oregon include categorical exemptions? (page 9)

