

Risk Action Levels

Cleaner Air Oregon

REFORMING OREGON'S INDUSTRIAL AIR QUALITY REGULATIONS

Inviting Oregonians to help create new regulations that protect what we all care about: the health of our people and our planet, and the economic vitality of our communities.

Joe Westersund, CAO Coordinator

July 28, 2017

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Risk Action Level Handout from June meeting

Summary of Proposed Changes to Risk Action Levels June 20th, 2017 Rules Advisory Committee Meeting



		Risk Action Levels			
		3/21 Framework Proposal		6/13 Draft Proposal	
		cancer	HI	cancer	HI
Facility	De minimis	0.5	0.5	0.5	0.5
New Emissions Unit	Emissions Unit	1	1	none	none
	Emissions Unit with TBACT	5	1	none	none
New Facility	Facility	10	1	10	1
	Accelerated Schedule	25	1	none	none
	Can only exceed with approval from DEQ Director after consultation with OHA and local/elected officials	none	none	10	1
	No permit issued	none	none	100	3
Existing Facility	Facility	10	1	25	1
	Accelerated Schedule	25	3	50	3*
	Can only exceed with approval from DEQ Director after consultation with OHA and local/elected officials	none	none	100	3
	If emissions from one or more facilities impact the same receptor at or above this value, then no new facilities or modifications are allowed that would increase impact at that receptor	considering a value between 20 and 80	2-4	considering a value between 50 and 100	3*

*Hazard Index of 3 or HI approved by DEQ/OHA by target organ (matrix that depends on uncertainty factor and severity of health effect)

[link](#)

New/Modified Toxics Emissions Units (TEU)

March Framework Proposal

- Included a RAL for new/modified TEUs, and a separate one for TEUs with TBACT, similar to other programs
- When applying to add or modify a TEU, facility would have to show the new TEUs meet TEU RALs, and also show whole facility meets facility RALs

June Framework Proposal

- No RALs at the TEU level. Adding/modifying TEUs can trigger check against facility RALs.

Why: total facility emissions are what matters to health. Can increase flexibility and decrease administrative burden by focusing on facilities, not TEUs.

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RAL: Risk Action Level

TBACT: Best Available Control Technology for Air Toxics

New Facilities

March Framework Proposal

- Facility RAL at 10 in a million / HI 1.
 - If above 10/1, must install TBACT on all significant units and apply for Conditional Risk Level (CRL)
- RALs for new facilities lumped in with existing, included concepts of risk reduction plans (RRP) & accelerated risk reduction schedule

June Framework Proposal

- New facility RAL still at 10/1, same requirement for CRL
- No RRP or accelerated schedule concept- doesn't apply to new facility
- No CRL above 10/1 unless granted approval from DEQ Director (who would consult with others including OHA & local elected officials).
- No new facilities allowed a permit above 100/3

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Why: keep same RAL, add a hard upper limit. RRP & accelerated risk reduction schedule don't make sense for new facilities

Existing Facilities

March Framework Proposal

- Facility RAL at 10/1
 - If above 10/1, must either do RRP or install TBACT on all significant units and apply for CRL
- Accelerated risk reduction schedule required at 25/1

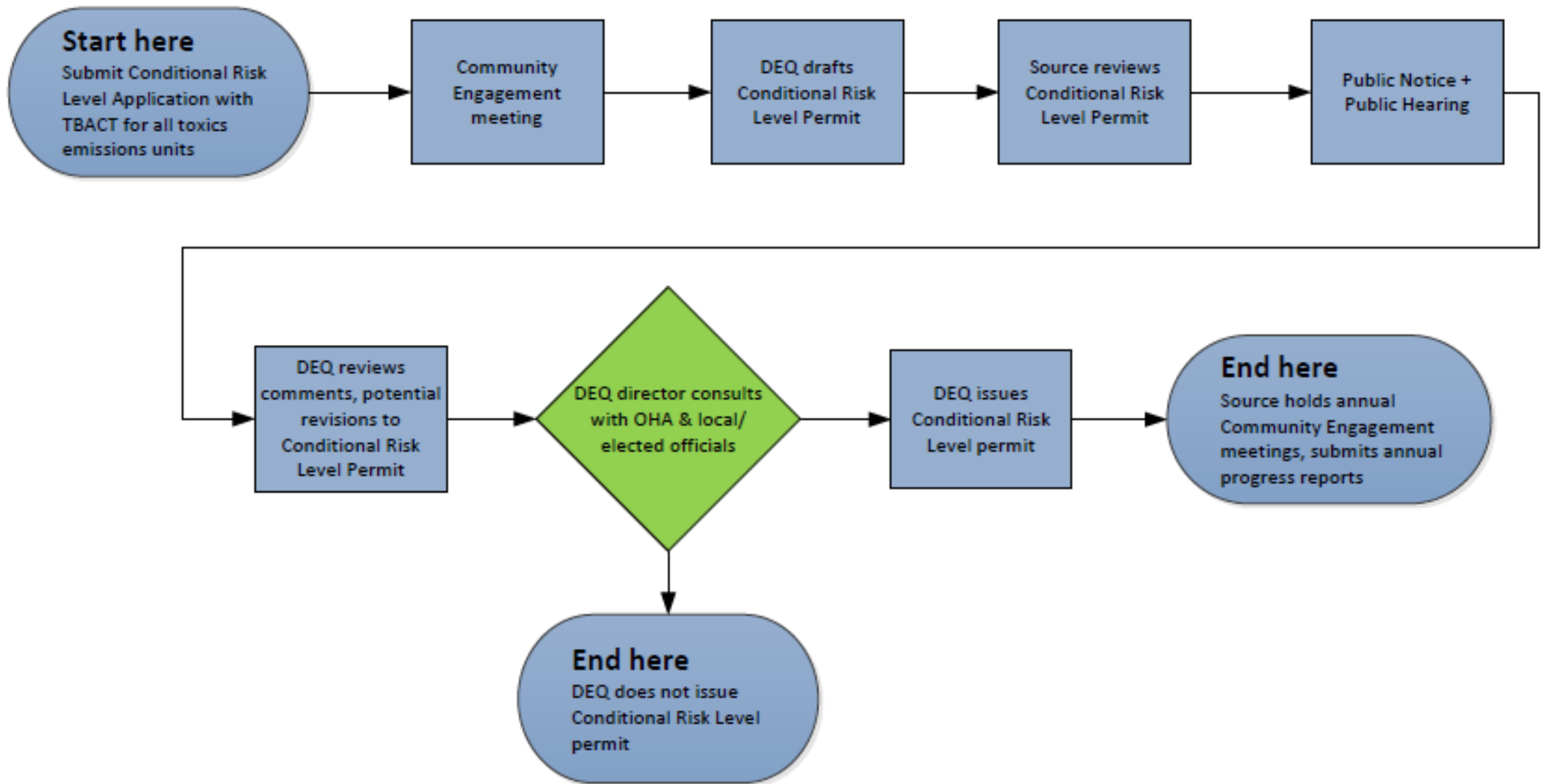
June Framework Proposal

- Facility RAL at 25/1, same requirements for RRP / CRL
- Accelerated risk reduction schedule required at 50/3*
- Facility above 100/3 not granted CRL unless approved by DEQ Director

Why: increase facility RAL to 25/1 to be comparable with other jurisdictions like South Coast. Allows DEQ to focus on higher risk facilities. Harder to retrofit an existing facility than to build from scratch to meet standards. Add director approval level as an upper limit with community input.

Director approval

- Needed if a facility wants a CRL above 10/1 (new facility) or 100/3 (existing facility)
- Requirements:
 - Install TBACT
 - Community engagement
- DEQ Director would consult with others including Oregon Health Authority and local elected officials before making decision



Flow Diagram for Director Consultation

Multifacility Area Risk

March Framework Proposal

- If emissions from one or more facilities impact the same receptor above area RAL, then no new facilities or modifications are allowed that would increase impact at that receptor
- Proposed area RAL between 20 and 80 for cancer, HI between 2 and 4

June Framework Proposal

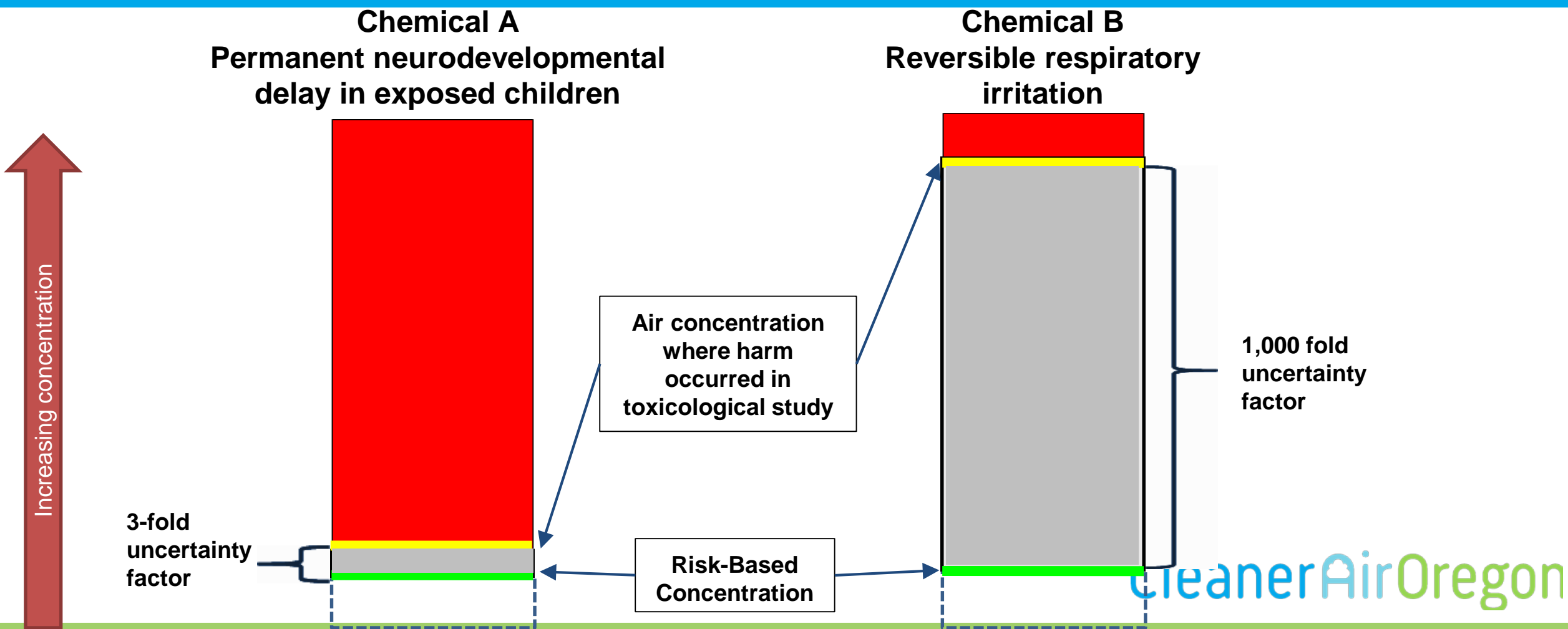
- Same area RAL concept
- Proposed area RAL between 50 and 100 for cancer, HI 3*

Why: revise area RAL cancer range upward to fit existing facility RAL proposal. Pick HI in the middle of range.

Other changes proposed at the June meeting

- Change “Allowable Risk Level” name to “Risk Action Level”
- Case by case evaluation of non-cancer risk

Case-by-case evaluation of non-cancer risk



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Further discussion or questions?

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	No permit issued	none	none	100	3
Existing Facility	Facility	10	1	25	1
	Accelerated Schedule	25	3	50	3*
	Can only exceed with approval from DEQ Director after consultation with OHA and local/elected officials	none	none	100	3
Area Cap	If emissions from one or more facilities impact the same receptor at or above this value, then no new facilities or modifications are allowed that would increase impact at that receptor	considering a value between 20 and 80	2-4	considering a value between 50 and 100	3*

*Hazard Index of 3 or HI approved by DEQ/OHA by target organ (matrix that depends on uncertainty factor and severity of health effect)