

Call-In, Community Engagement, and Ambient Monitoring Updates

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, a clean environment, and the economic vitality of our communities.

May 9, 2018

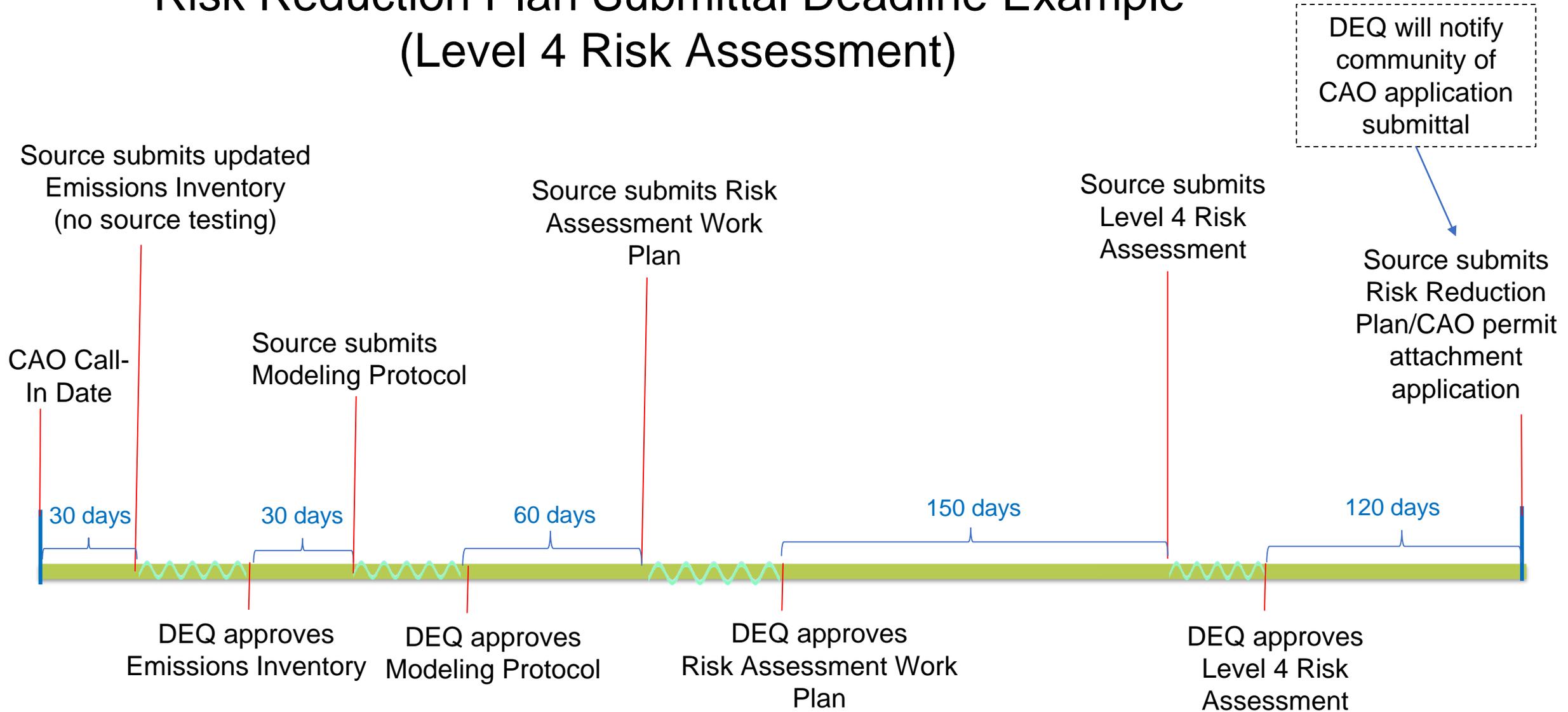
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Implementation: Call in Process

- DEQ will prioritize sources using the formula originally proposed, and may consider other criteria to set a call in schedule:
 - Severity of potential noncancer health effects
 - Existing level of emission controls
 - Distance to the closest person exposed
 - Potential refinement of initial screening
 - Efficient allocation of DEQ resources
 - Changes in emissions not captured in the screening
- Removed limit on number of sources to call in first 5 years



Risk Reduction Plan Submittal Deadline Example (Level 4 Risk Assessment)



Maximum of 270 days for Level 4 Risk assessment submittal – excludes DEQ review time
Maximum of 390 days for Risk Reduction Plan submittal – excludes DEQ review time

Community Engagement - Summary of Changes

Changes required by SB1541

- DEQ, not the source, convenes all public meetings
- Sources must participate



Other proposed changes

- Community engagement requirements (but no risk reduction) maintained at October RALs of 25/1
- Voluntary risk reduction opportunity in lieu of required community meeting

Public Notice and Engagement

- SB1541: DEQ “shall hold any public meeting required” by CAO
 - DEQ will set up the meetings and inform the affected community
 - A representative from the applicant source would attend
 - DEQ and the source will make a joint presentation
 - Sufficient time would be reserved for questions and discussion
- Sources would not be required to hold ongoing community forum meetings



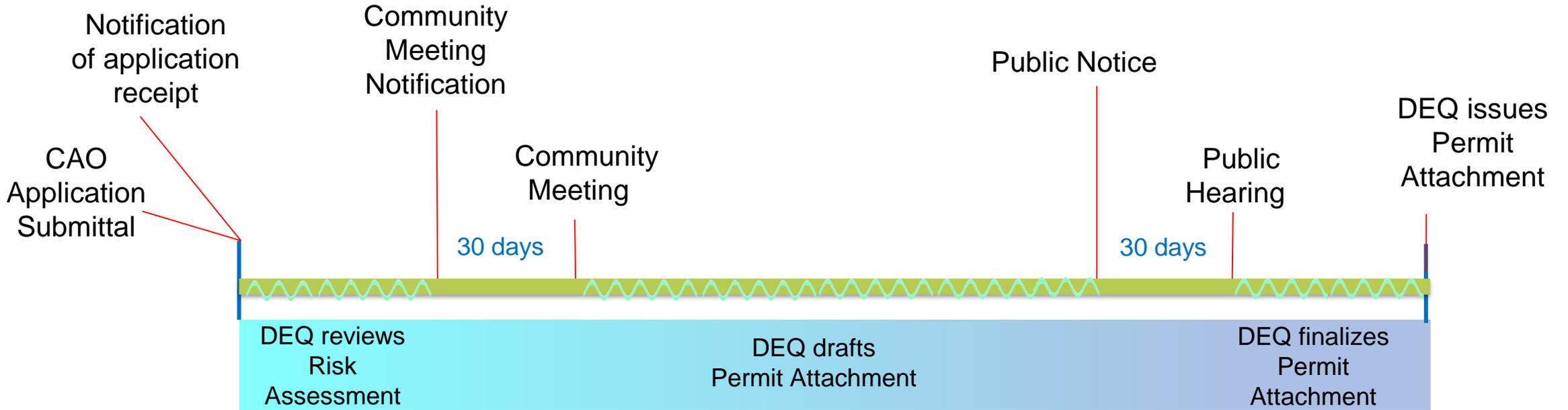
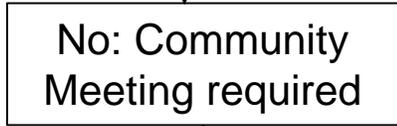
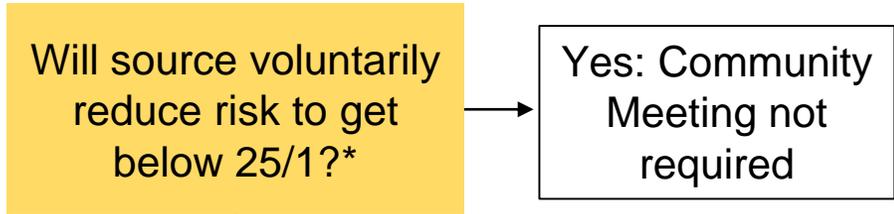
Public Notice and Engagement

DEQ proposes to hold **one** community engagement meeting before the public notice process instead of **two**

- Commenters interested in meeting after DEQ/OHA application review
- Early notice to public upon receipt of application
- DEQ and OHA will conduct all public meetings



Community Engagement and Public Notice Phase for Source Risk < 50/5



Ambient Monitoring Data

- Ambient monitoring allowed but:
 - Modeling must be completed first
 - Monitoring plan must be pre-approved by DEQ.
- Per SB1541, a facility can complete ambient monitoring before making risk reductions, unless modeled risk is above 200 in a million cancer risk and HI 20 (4 times RALs).



Required Ambient Monitoring

For the risk assessment, DEQ may require ambient monitoring in some situations if modeling does not accurately reflect ambient concentrations because:

- Emissions can be difficult to quantify and source testing is not an option
- Fugitive emission points can be difficult to characterize
- Fugitive emission dispersion can be difficult to model

