



State of Oregon Department of Environmental Quality

Short-Term NAAQS Internal Management Directive FAQs

Updated March 1, 2022

DEQ created the following Frequently Asked Questions to clarify directives regarding the Sept. 1, 2021 Short-term National Ambient Air Quality Standards Internal Management Directive.

1. What existing sources are impacted by this IMD?

Any facility that triggers State Type A or B New Source Review or major New Source Review will be subject to this IMD and the requirement for short-term NAAQS modeling. Changes include increases in the Plant Site Emission Limit by more than the Significant Emission Rate above the netting basis, or physical and operational changes that result in a major modification.

2. Does a modified existing source have to perform short-term modeling for PM_{2.5}, NO₂ and SO₂ if only one of these pollutants triggers New Source Review? What if a different pollutant triggers New Source Review?

- If the pollutant triggering NSR requires modeling, for example CO, then short-term NAAQS modeling is required for PM_{2.5}, NO₂, and SO₂ as well.
- If Volatile Organic Compounds or total PM emissions trigger NSR, the short-term NAAQS modeling for PM_{2.5}, NO₂ and SO₂ is not required because VOCs and total PM do not require modeling for their analysis.

3. For proposed new sources, what facility emissions are included in the short-term NAAQS evaluation?

- For proposed new sources, the short-term modeling is for the entire facility's potential to emit. This means using maximum short-term emission rates for each pollutant as identified by the applicant and approved by DEQ. The modeling results will be compared to the Significant Impact Level and if equal to or greater than the SIL, will be combined with background information and compared to the short-term NAAQS.
- With DEQ approval, a facility's PTE may be evaluated against the **trial** Significant Emission Threshold to satisfy the short-term NAAQS analysis and will not require short-term modeling.

4. For existing sources that trigger New Source Review, what emissions are included in short-term NAAQS evaluations?

- Short-term emissions are not defined within netting basis or baseline. If a modification to an existing source triggers major or State NSR, then the short-term NAAQS analysis will include the potential to emit for the entire facility. This will require establishment of short-term rates that are reflective of those used to demonstrate NAAQS compliance in the permit.
- Unless otherwise specified by permit condition **and** with DEQ approval, emission comparisons to the Significant Emissions Threshold may be used to satisfy the short-term NAAQS analysis or to determine if the short-term emission increase over a previous representative analysis warrants further evaluation.

5. Is an existing source that triggers New Source Review required to revisit the short-term NAAQS analysis if the source previously performed a short-term NAAQS compliance demonstration for NO₂, SO₂ or PM_{2.5}?

- If a source performed short-term NAAQS modeling previously and the analysis still represents current short-term operations, short-term emissions and no physical emission unit changes, then the source does not have to revisit the short-term NAAQS analysis for that pollutant. Note that the historical modeling of PM₁₀ can also be used as a surrogate to demonstrate short-term PM_{2.5} impact, which assumes all PM₁₀ is PM_{2.5}.
- For pollutants that have not been evaluated in previous modeling, the source is still required to model the short-term NAAQS for those pollutants.

6. Is a new or existing source required to do a short-term NAAQS analysis when criteria pollutant emissions are below the Significant Emissions Threshold?

- No, the purpose of the SETs is to be a screening tool for determining if new or existing sources are required to perform short-term NAAQS modeling for PM_{2.5}, NO₂ and SO₂.
- In October 2021, DEQ proposed a **trial** group of SETs for PM_{2.5}, NO₂ and SO₂, with a plan to re-evaluate the SETs in three years. During the trial period, the SETs are proposed emission rates and are to be used with approval by DEQ.

7. Will short-term limits be included as permit conditions as a result of the short-term NAAQS modeling?

Yes. Permit conditions may be necessary to protect against potential short-term NAAQS exceedances or to protect a PSD increment. Specific permit requirements could be dependent on the complexity of the source, how close modeled values are to the NAAQS, types of Emissions Units, locations of EUs, and other requirements that may apply to EUs. The examples of permit conditions may include but are not limited to:

- Short-term emission limits (e.g., grain loading);
- Short-term production limits;
- Emission action levels for specific EUs and/or the facility;
- Use of a Continuous Emission Monitoring System and performance testing to ensure that actual hourly emission rates are below the modeled emission rates; and/or
- Operational/monitoring requirements to ensure EUs and pollution control devices are properly operated and maintained.

Alternative formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.oregon.gov.