



State of Oregon Department of Environmental Quality

Short-Term NAAQS FAQs for Facilities

Updated Sept. 24, 2021

1. Why is DEQ adding short-term NAAQS requirements now?

- DEQ has a responsibility to issue permits that are National Ambient Air Quality Standards compliant. DEQ determined current methods used to ensure NAAQS compliance are inadequate in its current permitting process.
- The NAAQS Significant Emission Rates were developed based on an annual emission rate. Emission rates can vary throughout the year and annual average emissions can obscure a high peak.

2. When and how will DEQ prioritize facilities for short-term NAAQS modeling?

- **New Source:** As of June 9, 2021, all new sources are required to conduct the short-term NAAQS modeling as a part of their Simple and Standard permit application. If you are a new source applying for a permit, please visit the [NAAQS web page](#) to access the updated permit application forms, modeling guidance and technical assistance.
- **Existing Source:** If you are an existing source, there is nothing for you to do at this time. DEQ is developing a process to prioritize existing facilities to conduct the short-term NAAQS modeling. DEQ will notify your facility when it will be required to conduct the modeling and provide timelines, modeling guidance and resources.
 - i. Sources that trigger a New Source Review are subject to the short-term NAAQS requirements.
- **Existing Source Conducting CAO Risk Assessment:** If you are a facility conducting a Cleaner Air Oregon risk assessment, you have the option to perform the short-term NAAQS modeling concurrently with your CAO risk assessment or wait until there is a demonstration request from DEQ at a future date. Sources can avoid additional modeling fees by conducting the short-term NAAQS modeling during the CAO risk assessment process.

3. Will DEQ approve a new permit application if the short-term NAAQS modeling is not complete?

- No. Short-term NAAQS modeling is now part of the DEQ Air Quality new permit application. The short-term NAAQS modeling must be completed and submitted to both DEQ Technical Services and your regional permit writer for your new permit application to be considered technically complete.

4. Will DEQ perform the modeling for our facility?

- DEQ will provide technical assistance for short-term NAAQS modeling on a case-by-case basis for small businesses.

5. What if the modeling shows the short-term NAAQS are exceeded?

- The facility must demonstrate to DEQ through refined modeling, monitoring, testing, and/or controls that facility emissions are not, or will not, cause exceedance of the NAAQS. The scope of follow up will depend upon the degree of the modeled exceedance.
- For facilities under existing permits, the permit may need modifications to incorporate additional requirements to ensure compliance with the NAAQS.
- Facilities should work with their permit writer to identify appropriate next steps.

6. How should facilities conduct the short-term NAAQS modeling?

- For guidance on modeling, please review DEQ's [Recommended Procedures for Air Quality Dispersion Modeling](#) and [Short-Term NAAQS Quick Guide](#).
- Technical assistance is available through Air Quality Technical Services on a case-by-case basis. Contact [Phil Allen](#) or [Kristen Martin](#) for assistance.

7. Who should facilities contact for short-term NAAQS requirements?

- Your regional permit writer will be your main point of contact. If you do not have one, contact the [regional AQ manager](#) and they will assign someone to your facility.
- For technical assistance, please contact [Phil Allen](#) or [Kristen Martin](#) in DEQ Air Quality Technical Services.

8. Do I have to perform short-term NAAQS modeling if I am not called in to CAO?

- Yes, all facilities with a Simple or Standard ACDP have to conduct short-term NAAQS modeling.
- Cleaner Air Oregon and compliance with NAAQS are distinct regulatory requirements and one does not depend on the other. An existing facility not called into Cleaner Air Oregon may still be prioritized in the future for short-term NAAQS review.

9. What emissions should be included for the short-term NAAQS analysis?

- The short-term NAAQS analysis must include an evaluation of compliance with the NO₂ and SO₂ 1-hour NAAQS and the PM_{2.5} 24-hour standards. Applicants must provide the air quality analysis and all supporting information that demonstrates NAAQS compliance.