



Oregon

Kate Brown, Governor

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August 13, 2020

Tom Nilan
Portland General Electric
121 SW Salmon St
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Submitted via Email

Re: Round 2 Regional Haze Four Factor Analysis
PGE Beaver / Port Westward I (05-2520)

Dear Mr. Nilan:

Thank you for your letter from June 15, 2020 regarding DEQ's December 2019 request for a four factor analysis (FFA) for your Beaver/Port Westward I facility.

The Regional Haze Rule (40 CFR 51.308) was issued as part of the Clean Air Act on July 1, 1999. The goal of the Regional Haze program is to improve visibility conditions in Class I Areas back to natural conditions by 2064. Regional Haze is a long-term program that sets goals for visibility improvement in 10-year periods of time from 2004 through to 2064, with interim checks on visibility conditions every 5 years.

The letter DEQ sent to you regarding four factor analysis on December 23, 2019, is part of Oregon's requirements for Round 2 of the Regional Haze program, as detailed in 40 CFR 51.308(f), for the period from 2021 to 2028. DEQ used the 2017 PSELS to screen Oregon Title V facilities for applicability to conduct four factor analyses for the 2018-2028 round of the Regional Haze Program under Clean Air Act 40 CFR 51.308(f). DEQ requested the four factor analysis under OAR 340-214-0110.

As you state in your June 15, 2020 letter, based on several conversations between PGE and DEQ, PGE is willing to plan and commit to voluntarily reduce the PSELS of Regional Haze pollutants for the facility to below the screening threshold of $Q/d \leq 5.00$. This will allow the Department of Environmental Quality to better estimate air emissions and manage and maintain the quality of Oregon's airsheds for the environment and human health. Per our conversations and the June letter, through the permit renewal process, PGE plans and commits to reducing the PSELS for the facility on the following schedule.

Pollutant	PSEL Reductions (tons)					Total
	2021	2022	2023	2024	2025	
NO _x	1,876	358	358	358	358	3,308
PM/PM ₁₀	40	-	-	-	-	40
SO ₂	496	-	-	-	-	496
Total Reduction	2,412	358	358	358	358	3,844

The resulting federally enforceable PSELs will be as follows:

Pollutant	Current	PSEL (tons)				
		2021	2022	2023	2024	2025
NOx	3,776	1,900	1,542	1,184	826	468
PM/PM ₁₀	139	99	99	99	99	99
SO ₂	595	99	99	99	99	99
Total	4,510	2,098	1,740	1,382	1,024	666

Per the requirements of the Regional Haze Program, these changes would need to be federally enforceable by the time of the State Implementation Plan submission. DEQ has confirmed with EPA that this means the permit changes need to be incorporated and finalized, including the public comment period, by June 30, 2021, in order to meet the July 31, 2021 submission date for the State Implementation Plan. To meet that timeframe, you have agreed to submit a permit renewal and significant modification draft by March 15, 2021.

Given the total emissions of the facility will be below the screening threshold of 5.00 via permit renewal, and your voluntary acceptance of lower limitation of your unassigned emissions, DEQ agrees that this facility does not need to undergo a four factor analysis for Round 2 of Regional Haze review, and thanks you for this voluntary reduction in permitted emissions.

DEQ may reopen any issued permit to include applicable requirements consistent with Oregon Regional Haze regulations. In alignment with 40 CFR 51.308, Oregon sources may be subject to reexamination of visibility impacts if new information warrants reassessment. This letter concludes the process for the PGE Beaver / Port Westward I facility for the Second Planning Period of the Regional Haze Program.

We appreciate your commitment to protecting air quality and improving visibility in Oregon's National Parks and Wilderness Areas. If you have any questions about the content of this letter or need technical assistance, please feel free to contact D Pei Wu, PhD, at wu.d@deq.state.or.us or 503-229-5269.

Sincerely,



Ali Mirzakhali
Administrator
Air Quality Division

CC: David Monro, PGE
Michael Orman, Air Quality Planning Section Manager, DEQ
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Patty Jacobs, DEQ
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