

Public Notice

DEQ Requests Comments on US Bancorp's Proposed Air Quality Permit

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of US Bancorp's proposed air quality permit, known officially as a Simple Air Contaminant Discharge Permit.

Summary

DEQ received the application for the renewal of its existing Simple ACDP on Dec. 3, 2015. Since the last permit renewal, there have been no changes to the facility that resulted in an increase in emissions of regulated pollutants. DEQ updated the permit to include monitoring, recordkeeping and reporting requirements for the pollution control equipment.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

Northwest Region AQ Permit Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232

Fax: 503-229-6945

Email: NWRAQPermits@deq.state.or.us

Written comments are due by 5 p.m. Thursday Nov. 5, 2020.

About the facility

US Bancorp is located at 17650 NE Sandy Blvd. in Portland. DEQ last issued the permit on July 21, 2011.

US Bancorp operates a regional business center for U.S. Bank containing a data center, multiple call centers, information technology operations and regional security/monitory. Operations include four emergency engine-generator sets that are also used to mitigate power loss on the regional grid.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

What special conditions are in this permit?

The permittee is encouraged to exercise flexibility regarding the timing and number of emergency engines it operates at a given time for non-emergency purposes (readiness testing, maintenance, and dispatch).

How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally-approved monitoring practices and standards. The permittee would also be required to report instances of excess emissions of a nature that could endanger public health, and submit annual reports, including operating parameters for demonstrating compliance with permit conditions. DEQ also conducts facility inspections and reviews annual reports for actual emissions generated by the facility's overall operations.

What happens after the public comment period ends?

DEQ considers and responds to all comments received during the public comment period and may modify the proposed permit based on comments. If a facility meets all legal requirements, DEQ will issue the facility's air quality permit.

Where can I get more information?

Find out more and view the application at <https://go.usa.gov/xEJf2> or contact:

Northwest Region AQ Permit Coordinator

Phone: 503-229-5582 or 800-452-4011

Fax: 503-229-6945

Email: NWRAQPermits@deq.state.or.us

View the application and related documents in person at the DEQ office in Portland. For a review appointment, call 503-229-5582.

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.state.or.us.



State of Oregon
Department of
Environmental
Quality

Northwest Region
Air Quality Program
700 NE Multnomah St.
Suite 600
Portland, OR 97232

Phone: 503-229-6035
800-452-4011
Fax: 503-229-6945

Contact: Josh Alexander

www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Emissions limits

Criteria Pollutants: Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility’s actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Nitrogen oxides	39	39
Carbon monoxide	99	99
Sulfur dioxide	39	NA

For more information about criteria pollutants, go to: www.epa.gov/criteria-air-pollutants

Hazardous air pollutants:

US Bancorp is not a major source of hazardous air pollutants; however, EPA has determined that businesses similar to this facility, as a group, emit enough hazardous air pollutants to warrant regulation. Therefore, this source is subject to the following National Emission Standard for Hazardous Air Pollutants: 40 CFR Part 63, Subpart ZZZZ – “National Emission Standards for Reciprocating Internal Combustion Engines.” More detailed information can be found in the review report.

For more information about hazardous air pollutants, go to: <https://www.epa.gov/haps>



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
SIMPLE
AIR CONTAMINANT DISCHARGE PERMIT

Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

US Bancorp
2999 NE 181st Ave
Portland, OR 97230

INFORMATION RELIED UPON:

Application No.: 028458
Date Received: 12/03/2015

PLANT SITE LOCATION:

US Bancorp
17650 NE Sandy Blvd
Portland, OR 97230

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Gresham
Approval Date: 03/28/1991

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Matt Hoffman, Northwest Region Air Quality Manager

Date

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC/NAICS
Part B, 27	Electric power generation from combustion (emergency backup power to the facility and dispatchable power to the regional grid)	4911/221112

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1.0 DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

The devices, processes, and pollution control devices regulated by this permit are the following:

Devices and Processes Description	Device ID	Pollution Control Device Description	PCD ID
Four (4) Caterpillar 3516 emergency engine-generator sets	PG1 – PG4	Four (4) CL65-16 diesel oxidation catalysts	C1 – C4

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must ensure that emissions from any air contaminant source does not equal or exceed 20% opacity. Opacity must be measured as a six-minute block average using EPA Method 9.

2.2. Fugitive Emissions

- a. In no case may the permittee allow fugitive dust emissions to leave the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured by EPA method 22 with the minimum observation time of six minutes.
- b. At least monthly, the permittee must conduct a six (6) minute visible emission survey of the property boundary downwind from the fugitive emissions sources using EPA Method 22. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be trained and knowledgeable with respect to the general procedures for determining the presence of visible emissions. For purposes of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. No monitoring is required if the entire facility is shut down. [OAR 340-208-0210]
- c. If requested by DEQ, the permittee must:
 - i. Prepare and submit a fugitive emission control plan within 60 days of the request;
 - ii. Implement the DEQ approved plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period; and
 - iii. Keep the plan on site and make the plan available upon request. [OAR 340-208-0210]

2.3. Particulate Matter Emissions

The permittee must comply with the following particulate matter emission limits.

- a. Particulate matter emissions from four (4) generator engines must not exceed 0.14 grains per dry standard cubic foot; [OAR 340-226-0210(2)(b)(B)]
- b. Particulate matter emissions from any fuel burning equipment that is installed, constructed or modified on or after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot, corrected to 12% CO₂ or 50% excess air; and [OAR 340-228-0210(2)(c)]
- c. Particulate matter emissions from any device or process (other than fugitive emissions sources and fuel burning equipment) that is installed, constructed or modified after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2)(c)]

2.4. Particulate Matter Fallout

The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450]

2.5. Nuisance and Odors

The permittee must not cause or allow the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300]

2.6. Complaint Log

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution, odor, or nuisance concerns associated with the permitted facility. Documentation must include: [OAR 340-214-0114]

- a. The date the complaint was received;
- b. The date and time the complaint states the condition was present;
- c. A description of the pollution or odor condition;
- d. The location of the complainant/receptor relative to the plant site;
- e. The status of plant operation or activities during the complaint's stated time of pollution or odor condition; and
- f. A record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

2.7. Fuels and Fuel Sulfur Content

The permittee must not use any fuels in the emergency generators (PG1 through PG4) other than ASTM grade fuel oil with a maximum sulfur content of 0.0015% sulfur by weight (ultra-low sulfur diesel).

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

3.1. Operation of Pollution Control Devices and Processes

The permittee must operate and ensure proper functioning of all air pollution control devices and components at all times when the associated emission source is operating. [OAR 340-226-0120]

- a. The permittee must operate engine exhaust catalysts (C1 – C4) at a minimum exhaust system backpressure of 1 inch WC and a maximum exhaust system backpressure of 6 inches WC.
- b. The permittee must inspect C1 – C4 quarterly, beginning no later than 1 month following permit issuance. Inspections must include a visual assessment and pressure drop reading of each catalyst.

3.2. Operating Conditions for Emergency Stationary RICE

The permittee must operate PG1 through PG4 emergency stationary RICE in compliance with the following conditions: [40 CFR 63.6640(f)]

- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
- b. Emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing for a maximum 100 hours per calendar year, provided that the tests are recommended by the manufacturer, the vendor, or the insurance company associated with the engine. Permittee must maintain documentation of the recommendation.
- c. Emergency stationary RICE may be operated for Dispatch Operations for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing provided in Condition 3.2.b. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met in accordance with 40 CFR 63.6640(f)(4)(ii):

- i. The engine will be dispatched by the local balancing authority or local transmission and distribution system operations;
- ii. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region;
- iii. The dispatch follows reliability, emergency operation or similar protocols that follow specific North American Electric Reliability Corporation (NERC), regional, state, public utility commission or local standards or guidelines;
- iv. The power is provided only to the facility itself or to support the local transmission and distribution system; and
- v. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

3.3. Operation and Maintenance for Emergency Stationary RICE

The permittee must comply with the following requirements for each emergency stationary reciprocating internal combustion engines (RICE) PG1 through PG4: [40 CFR 63.6640(f)]

- a. At all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. [40 CFR 63.6605(b)]
- b. Change oil and filter every 500 hours of operation or annually, whichever comes first; [40 CFR 63.6603(a), table 2d(4)(a)]
- c. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first. [40 CFR 63.6603(a), table 2d(4)(b)] The permittee may elect to comply with the oil analysis requirements of §63.6625(i) in lieu of the oil change requirement. Oil analyses must be conducted at the same frequency as the oil change requirement;
- d. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; [40 CFR 63.6603(a), table 2d(4)(c)]
- e. The permittee must operate and maintain each stationary RICE according to the manufacturer's emission-related written instructions, including operation and maintenance instructions. If the permittee develops their own maintenance plan and it is approved by DEQ, that plan may substitute for the manufacturer's instructions. [40 CFR 63.6625(e) and 40 CFR 63.6640(a), Table 6(9)]
- f. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply; and [40 CFR 63.6603(a), table 2d]
- g. The permittee must install a non-resettable hour meter on each emergency stationary RICE, if one is not already installed. [40 CFR 63.6625(f)]

3.4. Highest and Best Practicable Treatment and Control

The permittee must provide the highest and best practicable treatment and control of air contaminant emissions in every case so as to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling, and other deleterious factors at the lowest possible levels as provided below: [OAR 340-226-0100]

- a. The permittee must take corrective action within 48-hours to return to highest and best practicable treatment and control upon exceeding the engine exhaust catalyst backpressure range of 1 inch WC to 6 inches WC, or the engine must be shut down until repairs are made; and
- b. The exceedance of an action level is not considered a violation of an emission limit in this permit, but a failure to take corrective action is a violation. [OAR 340-226-0120(2)(d)]

4.0 PLANT SITE EMISSION LIMITS**4.1. Plant Site Emission Limits (PSEL)**

The permittee must not cause or allow plant site emissions to exceed the following: [OAR 340-222-0040]

Pollutant	Limit	Units
NO _x	39	Tons per year
CO	99	

4.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

5.0 COMPLIANCE DEMONSTRATION**5.1. Monitoring Requirements**

The permittee must monitor the operations and maintenance of the facility and associated air contaminant control devices as follows: [340-226-0120]

- a. The emergency, non-emergency and dispatch hours of operation for each engine (PG1 through PG4);
- b. Dates, timeframes, durations, and reasons for each emergency and non-emergency operation event.

- c. The combined emergency, non-emergency and dispatch fuel usage for all engines combined (PG1 through PG4);
- d. Fuel delivery records indicating the gallons of fuel delivered and stated fuel sulfur content;
- e. The dates, times and records of inspections and maintenance performed, including visual assessments and pressure drop readings for the engine exhaust catalysts, and engine shutdowns, if any; and
- f. Any other parameters or processes required for the annual report.

5.2. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant: [OAR 340-222-0080]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

- E = pollutant emissions (tons/year);
- Σ = symbol representing “summation of”;
- EF = pollutant emission factor (see Condition 12.0);
- P = process production (see Condition 0)

5.3. Emission Factors

The permittee must use the default emission factors provided in Condition 12.0 for calculating pollutant emissions, unless alternative emission factors are approved in writing by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ. [OAR 340-222-0080]

5.4. PSEL Compliance Monitoring

The permittee must demonstrate compliance with the PSEL by totaling the emissions from all point sources calculated under Condition 5.2. [OAR 340-222-0080]

6.0 SPECIAL CONDITIONS

Because the permittee has some flexibility regarding the timing and number of emergency engines it operates at a given time for non-emergency purposes (readiness testing, maintenance and dispatch), DEQ encourages the permittee to exercise that flexibility to minimize short-term air contaminant concentrations emitted.

7.0 RECORDKEEPING REQUIREMENTS

7.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the facility and associated air contaminant control devices: [OAR 340-214-0114]

- a. For each individual emergency generator engine:
 - i. Monthly operating hours;
 - ii. Monthly operating hours for non-emergencies and dispatch reasons only; and
 - iii. Dates, timeframes, durations, and reasons for each emergency and non-emergency operation event.
- b. For all emergency generator engines combined:
 - i. Monthly operating hours; and
 - ii. Monthly operating hours for non-emergencies and dispatch operations only.
 - iii. Monthly and 12-month rolling total fuel consumption; and
 - iv. Monthly and 12-month rolling fuel consumption for non-emergencies and dispatch operations only;
- c. Monthly fuel delivery records indicating the gallons of fuel delivered and stated fuel sulfur content;
- d. Records of inspections and maintenance performed, on occurrence, including a visual assessment and pressure drop reading for each catalyst (C1 – C4), and engine shutdowns, if any;
- e. Copies of the manufacturer certifications and specifications for each emergency engine type and size at the facility as well as the date of installation. The manufacturer specifications must also include emission factors for all operating loads of all emergency engines used at the facility. The manufacturer specifications must be available for review during DEQ inspections; and
- f. Any other parameters or processes required for the annual report.

7.2. Excess Emissions

- a. The permittee must maintain the records of excess emissions listed below and as defined in OAR 340-214-0300 through 340-214-0340, recorded on occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity as a six-minute block average.

- i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
 - ii. The date and time the permittee notified DEQ of the event;
 - iii. The equipment involved;
 - iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations); and
 - vii. The final resolution of the cause of the excess emissions;
- b. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).
 - c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - d. If startups or shutdowns may result in excess emissions, the permittee must submit startup/shutdown procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 340-214-0310. New or modified procedures must be received by DEQ in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
 - e. If permittee anticipates that scheduled maintenance may result in excess emissions, the permittee must submit scheduled maintenance procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 340-214-0320. New or modified procedures must be received by DEQ in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
 - f. The permittee must maintain a log of all excess emissions in accordance with OAR 340-214-0340(3).

7.3. Complaints

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means according to Condition 2.6. Documentation must include all information identified in Condition 2.6. [OAR 340-214-0114]

7.4. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite. [OAR 340-214-0114]

8.0 REPORTING REQUIREMENTS

8.1. Excess Emissions

- a. The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 10.0 by email, telephone, facsimile, or in person; and
- b. The permittee must also submit follow-up reports summarizing records of excess emissions as required in Condition 7.2 when required by DEQ. The reports must be submitted to DEQ within 15 days of request.

8.2. Emergency Operations Reporting

The permittee must report emergency and dispatch engine operation from engine-generator sets (PG1 through PG4) within 30 days of the conclusion of the emergency or dispatch operation unless otherwise approved by DEQ in writing. The report must be submitted to the regional office identified in Condition 10.0 by email, fax, or USPS. Alternatively, the report may be submitted electronically via Emergency Operations Notification, Form R1009: <https://www.oregon.gov/deq/FilterPermitsDocs/R1009.pdf>. The report must include the following information:

- a. Dates and times the emergency operations started and ended, description of the emergency, and if known, the cause of the emergency;
- b. For each emergency event, total hours of emergency operation and total fuel consumption; and
- c. Calculated total criteria pollutant emissions (tons) from all emergency engines operated for emergency purpose for each emergency event, calculated using the formula of Condition 5.2 and substituting emergency fuel usage for the “P” value.

8.3. Annual Report

For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) paper copies and one (1) electronic copy of the following information for the previous calendar year. If February 15 falls on a weekend or Monday holiday, the permittee must submit their annual report on the next business day.

- a. Total monthly and each 12-month rolling period hours of operation for emergency, dispatch and non-emergency operations for each engine [PG1 through PG4], and all engines combined, recorded through non-resettable hour meters;
- b. Total monthly and each 12-month rolling period fuel delivery in gallons;
- c. Calculations of annual pollutant emissions determined each month in accordance with Condition 5.2;
- d. A brief summary listing the date, time, and the affected device/process for each excess emission that occurred during the reporting period;
- e. Summary of complaints relating to air quality received by permittee during the year in accordance with Condition 7.3;
- f. List permanent changes made to operation and maintenance of the facility and associated pollution control equipment which affected air contaminant emissions; and
- g. List major maintenance performed on pollution control equipment, including engine shutdowns due to visual inspections and/or pressure drop readings of engine exhaust catalysts.

8.4. Greenhouse Gas Registration and Reporting

- a. If the calendar year greenhouse gas emissions (CO₂e) are ever greater than or equal to 2,756 tons (2,500 metric tons), the permittee must annually register and report its greenhouse gas emissions with DEQ in accordance with OAR 340 division 215; and
- b. If the calendar year greenhouse gas emissions (CO₂e) are less than 2,756 tons (2,500 metric tons) for three consecutive years, the permittee may stop reporting greenhouse gas emissions but must retain all records used to calculate greenhouse gas emissions for the five years following the last year that they were required to report. The permittee must resume reporting its greenhouse gas emissions if the calendar year greenhouse gas emissions (CO₂e) are greater than or equal to 2,756 tons (2,500 metric tons) in any subsequent calendar year.

8.5. Notice of Change of Ownership or Company Name

The permittee must notify DEQ in writing using a DEQ "Transfer Application Form" within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

8.6. Construction or Modification Notices

The permittee must notify DEQ in writing using a DEQ "Notice of Intent to Construct Form," or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;

- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

9.0 ADMINISTRATIVE REQUIREMENTS

9.1. Permit Renewal Application

The permittee must submit the completed application package for renewal of this permit **120 days prior to the expiration date**. Two (2) paper copies and one (1) electronic copy of the application must be submitted to the DEQ Permit Coordinator listed in Condition 10.2. [OAR 340-216-0040]

9.2. Permit Modifications

Application for a modification of this permit must be submitted at least 60 days prior to the source modification. When preparing an application, the applicant should also consider submitting the application 120 days prior to allow DEQ adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office.

9.3. Annual Compliance Fee

The permittee must pay the annual fees specified in OAR 340-216-8020, Table 2, Parts 2 and 3 for a Simple ACDP by **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

9.4. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 4 with an application for changing the ownership or the name of the company.

9.5. Special Activity Fees

The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, Part 4 with an application to modify the permit.

10.0 DEQ CONTACTS / ADDRESSES

10.1. Business Office

The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

Oregon Dept. of Environmental Quality
Financial Services – Revenue Section
700 NE Multnomah St., Suite 600
Portland, Oregon 97232-4100

10.2. Permit Coordinator

The permittee must submit all notices and applications that do not include payment to the Permit Coordinator.

Oregon Dept. of Environmental Quality
Northwest Region Air Quality
Permit Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
nwraqpermits@deq.state.or.us

10.3. Report Submittals

Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Region. If you know the name of the Air Quality staff member responsible for your permit, please include it:

Oregon Dept. of Environmental Quality
Northwest Region Air Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100

10.4. Web Site

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at www.oregon.gov/deq/.

11.0 GENERAL CONDITIONS AND DISCLAIMERS

11.1. Permitted Activities

- a. Until this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from the following:
 - i. Processes and activities directly related to or associated with the devices/processes listed in Condition 1.0 of this permit;
 - i. Any categorically insignificant activities, as defined in OAR 340-200-0020, at the source; and
 - ii. Construction or modification changes that are Type 1 or Type 2 changes under OAR 340-210-0225 that are approved by DEQ in accordance with OAR 340-210-0215 through 0250, if the permittee complies with all of the conditions of DEQ's approval to construct and all of the conditions of this permit.
- b. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

11.2. Other Regulations

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

11.3. Conflicting Conditions

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. [OAR 340-200-0010]

11.4. Masking of Emissions

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400]

11.5. DEQ Access

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.

11.6. Permit Availability

The permittee must have a copy of the permit available at the facility at all times. [OAR 340-216-0020(3)]

11.7. Open Burning

The permittee may not conduct any open burning except as allowed by OAR 340, division 264.

11.8. Asbestos

The permittee must comply with the asbestos abatement requirements in OAR 340, division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

11.9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

11.10. Permit Expiration

- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit: [OAR 340-216-0082]
 - i. A timely and complete application for renewal of this permit or for a different ACDP has been submitted; or
 - ii. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
 - iii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

11.11. Permit Termination, Revocation, or Modification

DEQ may terminate, revoke, or modify this permit pursuant to OAR chapter 340 division 216. [OAR 340-216-0082].

12.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Emergency generator engines (PG1 through PG4)	NO _x	59.79	lb/hr	Manufacturer
	CO	4.95 ^[1]	lb/hr	Manufacturer

[1] The CO emission factor includes a 70% control efficiency.

13.0 PROCESS/PRODUCTION RECORDS

Emissions device or activity	Process or production parameter	Frequency
Emergency generator engines (PG1 through PG4)	Hours of operation: a. Maintenance & readiness testing b. Emergency operation c. Dispatch	Monthly, each engine

14.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O ₂	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31 st	O&M	operation and maintenance
CAO	Cleaner Air Oregon	Pb	lead
CFR	Code of Federal Regulations	PCD	pollution control device
CO	carbon monoxide	PEMS	Predictive emission monitoring system
CO _{2e}	carbon dioxide equivalent	PM	particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
dscf	dry standard cubic foot	PM _{2.5}	particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
Gal	gallon(s)	PSEL	Plant Site Emission Limit
GHG	greenhouse gas	PTE	Potential to Emit
gr/dscf	grains per dry standard cubic foot	RACT	Reasonably Available Control Technology
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	Special Control Area	as defined in OAR 340-204-0070
NO _x	nitrogen oxides	TACT	Typically Achievable Control Technology
NSPS	New Source Performance Standard	VE	visible emissions
NSR	New Source Review	VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



State of Oregon
Department of
Environmental
Quality

SIMPLE AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

US Bancorp
17650 NE Sandy Blvd.
Portland, OR 97230

Source Information:

SIC	4911
NAICS	221112
EPA ICIS-Air ID	

Source Categories (Table 1 Part, code)	Part B, 27
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	Yes

Source test	
COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	2/15
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

Air Programs

Synthetic Minor (SM)	
SM -80	
NSPS (list subparts)	
NESHAP (list subparts)	<i>ZZZZ</i>
CAO	
NSR	

PSD	
GHG	
RACT	
TACT	
Other (specify)	

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PERMITTING

PERMITTEE IDENTIFICATION

US Bancorp
17650 NE Sandy Blvd
Portland OR 97230

PERMITTING ACTION

1. The proposed permit is a renewal of an existing Simple Air Contaminant Discharge Permit (ACDP) that was issued on July 21, 2011 and was originally scheduled to expire on March 1, 2016. The permittee is on a Simple ACDP because the facility has only one type of emissions source and has accepted generic Plant Site Emission Limits (PSEL). The existing ACDP remains in effect until final action has been taken on the renewal application because the permittee submitted a timely and complete application for renewal.
2. US Bancorp has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because the air quality permit application was submitted and deemed complete, or construction had commenced on this facility prior to November 16, 2018. As an existing source the permittee is required to perform a risk assessment in accordance with OAR 340-245-0050, and demonstrate compliance with the Risk Action Levels for an “Existing Source” in OAR 340-245-8010 Table 1 when called in by DEQ. US Bancorp has not been called in and therefore, has not performed a risk assessment.

OTHER PERMITS

3. No other DEQ land quality or water quality permits have been issued or are required for this source.

ATTAINMENT STATUS

4. The source is located in a maintenance area for CO and ozone [NO_x and VOC are precursors to ozone]. The area is in attainment for all other criteria pollutants.
5. The source is not located within 10 kilometers of any Class I Air Quality Protection Areas.

SOURCE DESCRIPTION

OVERVIEW

6. The permittee operates a regional business center for U.S. Bank containing a data center, multiple call centers, I.T. operations, and regional security/monitoring. Operations include four (4) emergency engine-generator sets that are also used to mitigate power loss on the regional power grid. The facility was built in 1991 and operates 24 hours/day, seven days/week. U.S. Bank is the only occupant.
7. No changes have been made to the facility since the last permit renewal that caused an increase in any regulated pollutant emissions; however, the permittee notified DEQ of changes to the generator control systems, fuel oil systems and underground storage tanks, including:
 - a. Replaced and moved generator control systems.
 - b. Replaced two (2) existing 165 gallon day tanks with three (3) new 200 gallon day tanks.
 - c. Replaced two (2) existing submersible pumps with four (4) new submersible pumps.
 - d. Replace two (2) existing 30,000 gallon Xerxes double wall fiberglass tanks with two new tanks of similar capacity and type; proposed installation in 2020.

PROCESS AND CONTROL DEVICES

8. Device/Process:

Each emergency generator set consists of a Caterpillar engine, coupled with an electric generator, each rated at 1600kW. Each engine combusts ultra-low sulfur diesel (ULSD) fuel oil, which is contained in two (2) 30,000 gallon underground storage tanks. The maximum ULSD fuel oil consumption is 127 gallons per engine/per hour. Each engine is equipped with a DCL DC65-16 diesel oxidation catalyst, and according to the manufacturer achieves 70% CO removal efficiency. The removal efficiency is included in the emission factor, as discussed in paragraph 16.h. The engine model numbers, constructions/installation dates and pollution control devices are shown in the table below:

Device/ Process ID	Device/Process Description	Construction / Installation Date	Pollution Control Device ID	Pollution Control Device Description	Construction / Installation Date	Control Efficiency
PG1 (25Z02381)	Caterpillar 3516	1991	C1	Diesel Oxidation Catalyst – each engine DCL DC65-16	2002	CO – 70%
PG2 (25Z02378)			C2			
PG3 (25Z02351)			C3			
PG4 (25Z02294)			C4			

COMPLIANCE HISTORY

9. The facility was inspected on August 5, 2015 and found to be in compliance with all permit conditions.
10. During the prior permit period there were no complaints recorded for this facility.
11. No enforcement actions have been taken against this source since the last permit renewal.

SPECIAL CONDITIONS

12. Because the permittee has some flexibility regarding the timing and number of emergency engines it operates at a given time for non-emergency purposes (readiness testing, maintenance and dispatch), DEQ encourages the permittee to exercise that flexibility to minimize short-term air contaminant concentrations emitted.
13. The engine-generator sets (PG1 – PG4) are enrolled in Portland General Electric's (PGE's) Dispatchable Standby Generator (DGS) program (<https://www.portlandgeneral.com/business/get-paid-to-help-meet-demand/dispatchable-standby-generation>), and are not only considered emergency engines by DEQ, as these generators can be operated by PGE through remote switching gear to provide power to the electric power grid during dispatch. The PGE DGS contract however limits this dispatch to 50 hours or less per year for each enrolled engine (and this 50 hours of operation in non-emergency situations are counted as part of the overall 100 hours per calendar year for maintenance and testing). This maintains the EPA NESHAP Subpart ZZZZ definition of emergency engine, per 40 CFR 63.6675; see paragraph 30 for additional NESHAP Subpart ZZZZ information. DEQ acknowledges the following criteria for emergency generators under NESHAP Subpart ZZZZ for PGE dispatch in accordance with 40 CFR 63.6640(f)(4)(ii):

- a. The engine will be dispatched by the local balancing authority or local transmission and distribution system operations;
 - b. The dispatch is intended to mitigate local transmission and/or distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region;
 - c. The dispatch follows reliability, emergency operation or similar protocols that follow specific NERC¹, regional, state, public utility commission or local standards or guidelines;
 - d. The power is provided only to the facility itself or to support the local transmission and distribution system; and
 - e. The owner or operator identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.
14. Emergency engine use:
- a. The engine-generator sets have unlimited time use during emergency situations [40 CFR 63.6640(f)(1)], which is defined as “any situation arising from sudden and reasonably unforeseeable events beyond the control of the owner or operator, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes the source to exceed a technology-based emission limitation under the permit, due to unavoidable increases in emissions attributable to the emergency. An emergency does not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.” (OAR 340-200-0020(50))
 - b. US Bancorp must submit notification (Emergency Operations Notification, From R1009: <https://www.oregon.gov/deq/FilterPermitsDocs/R1009.pdf>) for each emergency or dispatch operation from engine generator sets (PG1 through PG4).
 - c. US Bancorp must maintain monthly records of hours of operation under the following uses for each engine [40 CFR 63.6655(f)]:
 - i. Maintenance & readiness testing
 - ii. Dispatch operation
 - iii. Emergency operation
15. This source has the potential to exceed major source levels for NO_x during emergency operations, however, the permit will limit ULSD fuel oil usage to 420,000 gallons in any 12-consecutive calendar month period for emergency and non-emergency operations for all the emergency engines combined. The source has also accepted PSEs below major source levels.

¹ NERC - North American Electric Reliability Corporation

EMISSIONS

16. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
SO ₂	0	0	0	39	NA	-39
NO _x	0	0	0	39	39	0
CO	0	0	0	99	99	0

- a. The baseline emission rates are zero since this facility was constructed after the baseline period for criteria pollutants (1977 – 1978).
- b. The netting basis is zero for Simple ACDPs in accordance with OAR 340-222-0046(2).
- c. The previous PSEL is the PSEL in the last permit.
- d. For Simple ACDPs, the proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with OAR 340-216-0064(3)(b).
- e. The potential to emit for this facility is 11.96 tons NO_x and 1.0 ton CO per year based on the operation of each engine at 100 hours per year at the load resulting in the maximum hourly emission rate for the generator. CO includes a 70% control efficiency provided by the diesel oxidation catalyst. Potential to emit is summarized below in paragraph 23. The emissions are based on a maximum fuel usage of 50,800 gallons ULSD for maintenance and testing (12,700 gallons per engine or 127 gallons per hour).
- f. The permit does not include PSELs for PM/PM₁₀/PM_{2.5}, SO₂, VOC, single HAP and combined HAPs because the potential emissions for non-emergency operations are less than the de minimis level of 1 ton per year for each pollutant, per OAR 340-200-0020(39).
- g. The SO₂ PSEL was removed from the permit because potential emissions for non-emergency operations are less than the de minimis level of 1 ton per year. Actual emissions of SO₂ in 2019 were 0.002 tons. SO₂ emissions were reduced when the permittee switched to ultra-low sulfur diesel prior to the last permit issuance.

- h. The NO_x and CO emission factors were updated based on engine test data provided by the engine manufacturer. NO_x was changed from 41.20 lb/hr to 59.79 lb/hr and CO was changed from 9.03 lb/hr to 4.95 lb/hr. The CO emission factor contains a 70% control efficiency which was not previously included. Catalytic oxidizers were added in 2002. The CO emission factor would be 16.49 lb/hr uncontrolled.
- i. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

- 17. For each pollutant, the proposed Plant Site Emission Limit is less than the sum of the Netting Basis and the significant emission rate, thus no further air quality analysis is required at this time.

TITLE V MAJOR SOURCE APPLICABILITY

- 18. A major source is a facility that has the potential to emit 100 tons/year or more of any criteria pollutant or 10 tons/year or more of any single HAP or 25 tons/year or more of combined HAPs.
- 19. A source that has potential to emit at the major source levels but accepts a PSEL below major source levels is called a synthetic minor (SM).
- 20. A source that has the potential to emit above the Title V major source thresholds but is willing to take a limit that is 80% or greater of the major source thresholds (e.g., 80 tons per year or greater for criteria pollutants) is called a synthetic minor 80 (SM-80).
- 21. A source that has the potential to emit less than major source thresholds is called a true minor.
- 22. A source that has the potential to emit less than major source thresholds but is required by rule to obtain a Title V permit is called a Title V minor source.

CRITERIA POLLUTANTS

- 23. This facility is a true minor source of criteria pollutant emissions. The potential to emit, based on 100 hours per year of operation for each generator engine (NESHAP ZZZZ limit for maintenance and testing, including up to 50 hours per year dispatchable power generation for each generator engine), operating at the load with maximum hourly emission rate is shown in the table below:

Pollutant	Potential to Emit (tons/yr)
PM	0.23
PM ₁₀	0.23
PM _{2.5}	0.23
NO _x	11.94
CO	1.00
VOC	0.29
Combined HAPs	0.024
GHG (CO ₂ e)	520

HAZARDOUS AIR POLLUTANTS

24. This source is an area source and not a major source of hazardous air pollutants, as shown below:

Hazardous Air Pollutants	Potential to Emit (pounds/year)	Actual Emissions (2016) (pounds/year)
1,3-Butadiene	44.18	3.08
Acetaldehyde	159.17	11.08
Acrolein	6.89	0.48
Arsenic	0.33	0.02
Benzene	37.86	2.64
Cadmium	0.30	0.02
Ethyl benzene	2.21	0.15
Formaldehyde	350.74	24.41
Hexane	5.47	0.38
Hydrochloric acid	37.86	2.64
Lead	1.68	0.12
Manganese	0.63	0.04
Mercury	0.41	0.03
Napthalene	4.00	0.28
Nickel	0.79	0.06
Selenium	0.45	0.03
Toluene	21.42	1.49
Xylenes (mixed)	8.62	0.6
Total HAP emissions	683.01	47.55

CLEANER AIR OREGON

25. The Cleaner Air Oregon Toxic Air Contaminant emissions inventory for this source can be found on this website: https://www.deq.state.or.us/AQPermitsonline/26-3267-SI-02_ATEI_2016.PDF.
26. US Bancorp has not been called in and therefore, has not performed a risk assessment.

TOXICS RELEASE INVENTORY

27. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which DEQ has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, [chemicals covered by the TRI Program](#) are those that cause:
 - a. Cancer or other chronic human health effects;
 - b. Significant adverse acute human health effects; or
 - c. Significant adverse environmental effects.
28. There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.
29. US Bancorp is not covered by the TRI program because it is not one of the specific industry sectors required to report under the TRI program, nor does it manufacture, process or use TRI-listed chemicals in quantities above threshold levels in a given year.

ADDITIONAL REQUIREMENTS

NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

30. 40 CFR Part 60, Subpart IIII – “**Standards of Performance for Stationary Compression Ignition Internal Combustion Engines**” is not applicable to the source because it operates four (4) internal combustion engines (ICE) installed in 1991. Subpart IIII applies to CI ICE, that are not fire pump engines, manufactured after April 1, 2006. [40 CFR 60.4200(a)(2)]
31. 40 CFR Part 60, Subpart JJJJ – “**Standards of Performance for Stationary Spark Ignition Internal Combustion Engines**” is not applicable to the source because it applies to new, modified and reconstructed spark ignition (SI) internal combustion engines (ICE). US Bancorp’s existing generators are compression ignition (CI) ICE.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS APPLICABILITY

32. 40 CFR Part 63, Subpart ZZZZ – “**National Emission Standards for Stationary Reciprocating Internal Combustion Engines**” is applicable to the source because it applies to existing stationary reciprocating internal combustion engines (RICE) located at area sources of HAP emissions that commenced construction of the stationary RICE prior to June 12, 2006. The source operates four (4) RICE that were installed in 1991.
33. The source is subject to the following updated federal standards or requirements that, at time of permit issuance, have not been adopted by the Environmental Quality Commission. For any violations of the following specific regulation, the permittee may be subject to enforcement action by EPA, but not DEQ. DEQ retains the authority to modify the permit or issue attachments as provided in Oregon Administrative Rule Chapter 340 Division 216 if the EQC adopts these regulations.

Applicable Federal Standards Not Yet Adopted by EQC			
40 CFR Part	Subpart	Federal Register Citation	Date of Promulgation
63	A - General Provisions	83 FR 56725	11/14/2018
63	A - General Provisions	84 FR 47882	09/11/2019

GREENHOUSE GAS REPORTING APPLICABILITY

34. The source is not subject to greenhouse gas reporting under division 215 because actual greenhouse gas emissions are less than 2,500 metric tons (2,756 short tons) of CO₂ equivalents per year. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

REASONABLY AVAILABLE CONTROL TECHNOLOGY APPLICABILITY

35. The facility is located in the Portland AQMA but it is not one of the listed source categories in OAR 340-232-0010 and does not meet the applicability criteria, thus the RACT rules do not apply.

TYPICALLY ACHIEVABLE CONTROL TECHNOLOGY APPLICABILITY

36. The source is likely meeting OAR 340-226-0130 Highest and Best Practicable Treatment and Control and Typically Achievable Control Technology (TACT) by operating diesel oxidation catalysts on each its four (4) engines to control carbon monoxide (CO) emissions.

SOURCE TESTING

PRIOR TESTING RESULTS

37. There are no source testing requirements for this facility because the potential to emit for NO_x and CO are well below the PSEs for those pollutants, and the remaining criteria and hazardous air pollutants are below de minimis levels.

PUBLIC NOTICE

Pursuant to OAR 340-216-0064(4)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on October 6, 2020 and the comment period will end on November 5, 2020 at 5 p.m.**

ja:wl