

## CLIFFORD Katie \* ODOE

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**From:** BAILEY Mark <Mark.Bailey@state.or.us>  
**Sent:** Monday, September 9, 2019 2:57 PM  
**To:** WELCH Doug; CLIFFORD Katie \* ODOE; BAILEY Mark  
**Subject:** RE: ACDP for Perennial Wind Chaser Station

Yep, looks correct and well written.

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**From:** WELCH Doug <Doug.WELCH@state.or.us>  
**Sent:** Monday, September 9, 2019 1:21 PM  
**To:** 'CLIFFORD Katie \* ODOE' <Katie.Clifford@oregon.gov>; BAILEY Mark <Mark.Bailey@state.or.us>; WELCH Doug <Doug.WELCH@state.or.us>  
**Subject:** RE: ACDP for Perennial Wind Chaser Station

You summary looks correct to me.

Doug Welch, P.E.  
Environmental Engineer  
Oregon Department of Environmental Quality  
Pendleton Office  
(541) 278-4621

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**From:** CLIFFORD Katie \* ODOE <[Katie.Clifford@oregon.gov](mailto:Katie.Clifford@oregon.gov)>  
**Sent:** Monday, September 9, 2019 1:03 PM  
**To:** BAILEY Mark <[Mark.Bailey@state.or.us](mailto:Mark.Bailey@state.or.us)>; WELCH Doug <[Doug.WELCH@state.or.us](mailto:Doug.WELCH@state.or.us)>  
**Subject:** RE: ACDP for Perennial Wind Chaser Station

Hi Mark and Doug,

Thank you very much for our conversations this morning. I've summarized the main points below. Would you please either verify my understanding or provide correction?

- Perennial did apply for an ACDP permit modification to extend the construction deadline by an additional 18 months. DEQ is evaluating the application; the permit has not yet been modified and still needs to go through the public comment process.
- If the permit modification is granted, and Perennial does not begin construction by July 26, 2020, they would need to apply for a new ACDP from DEQ.
- Class I area impacts:
  - o DEQ would not issue an ACDP or a modified ACDP for a facility if there would be significant adverse impacts to Class I areas.
  - o DEQ's review report for the original ACDP issuance stated, "Based on the air quality analysis, DEQ has determined that the Perennial-WindChaser will not have an adverse impact on air quality in any Class I and Class II areas nor on the Columbia River Gorge National Scenic Area." **For the following reasons, DEQ does not anticipate that the facts underlying this conclusion would change any time before September 23, 2020 (the requested construction deadline through EFSC's process):**
    - Perennial's current request for an ACDP permit modification does not indicate any changes to the configuration or emissions profile of the facility.
    - The ambient air quality is not likely to change appreciably before September 23, 2020.

- The relevant air quality standards are not likely to change appreciably before September 23, 2020.
  - The relevant air quality models have not recently changed appreciably, and are not likely to change appreciably before September 23, 2020.
- DEQ considers the cumulative air quality impacts of the Perennial Wind Chaser Station and the Hermiston Generating Plant: “Perennial and Hermiston Generating will be considered a single, existing source for purposes of determining New Source Review (NSR) applicability due to Perennial’s location, similar operation, and operational control. [OAR 340-200-0020(166)] However, Perennial will construct and operate under a separate air quality permit.” [From the Standard Air Contaminant Discharge Permit Review Report for the 2017 ACDP permit modification]
  - Hermiston Generating Plant has had no regulatory citations associated with its DEQ air quality permits since it began operation.

Appreciate your help!

Katie

**Katie Clifford**

Senior Siting Analyst

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**From:** CLIFFORD Katie \* ODOE

**Sent:** Wednesday, September 4, 2019 12:56 PM

**To:** BAILEY Mark <[Mark.Bailey@state.or.us](mailto:Mark.Bailey@state.or.us)>

**Subject:** ACDP for Perennial Wind Chaser Station

Hi Mark,

We’ve had some questions come up related to a standard Air Contaminant Discharge Permit issued for the Perennial Wind Chaser Station (permit number 30-0039-ST-01, attached to this email). Would you be the right person at DEQ to speak to?

The Energy Facility Siting Council is reviewing Perennial’s request for a construction deadline extension under the EFSC site certificate. It appears that the Council previously found (as part of its review of the original application for site certificate) that, because of the distance of the facility from Class 1 areas as well as the fact that the facility would need to obtain a Prevention of Significant Deterioration/Air Contaminant Discharge Permit from DEQ, the facility would have a negligible impact on Class 1 areas.

We received public comments related to the expiration date of the ACDP. As we evaluate those comments, the following questions have come up for us:

- Did Perennial request an additional 18-month construction deadline extension from DEQ? If so, did DEQ approve this extension and is the new construction deadline July 26, 2020?
- What happens if Perennial does not begin construction by July 26, 2020? Would they need to apply for a new ACDP from DEQ?
- Does their analysis of potential impacts to Class 1 areas become invalid if they don’t begin construction by July 26, 2020?

Katie



**Katie Clifford**

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Stay connected!