

DEQ Extends Comment Period to August 16, 2010

Proposed Renewal of Oregon Title V Operating Permit and Acid Rain Permit for Portland General Electric Company – Boardman Plant



State of Oregon
Department of
Environmental
Quality

Due to high public response and to ensure that everyone has ample time to respond to the proposed TV Permit renewal action the comment period has been extended once again from July 23 until **August 16, 2010**.

DEQ's Role:

The Oregon Department of Environmental Quality is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, and for managing the proper disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities. DEQ issues permits to regulate the type and amount of air emissions at a regulated facility.

Comments due:

Written comments due: 5 p.m., **August 16, 2010**

Where can I send my comments?

Nancy Swofford, Permit Coordinator
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Where can I get technical information?

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Where can I get background information?

You can review electronic versions of the draft permit and review report by clicking on the links below:

[Draft Permit](#)
[Review Report](#)
[Emissions Detail Sheets](#)

You can also review the draft permit and related documents at the Oregon Trail Library Dist. located at 200 S Main Street in Boardman and the DEQ offices in Bend, The Dalles, and Pendleton. For a review appointment, call Nancy

Swofford at (541) 633-2021. Additional information, including comments received during the previous public comment periods, is available at: www.deq.state.or.us/er/PGE.htm

What is proposed?

DEQ proposes to renew a Title V air operating permit for Portland General Electric Company and is inviting public comment on the proposed permitting action. During the comment period the public is invited to make comments related to specific conditions within the proposed permit.

This is the third public comment period for the permit renewal. A draft of the permit was released for public comment on April 27, 2006. Public hearings were held on June 15, 2006 in Boardman, Oregon and June 28, 2006 in Portland, Oregon. The comment period ended July 7, 2006. A summary of the comments and DEQ's responses is provided in Appendix E of the review report. Shortly after the comment period, DEQ's rulemaking panel, the Environmental Quality Commission was about to take final action on a rule that would limit mercury emissions from coal fired power plants, but decided to wait until the mercury rule would be finalized and the requirements could be included in the permit renewal.

A revised draft permit, updated review report, and response to comments were provided for public comment April 11, 2007. Public hearings were held on May 16, 2007 in Boardman and May 31, 2007 in Portland. The comment period ended on June 15, 2007. A summary of the comments and the DEQ's responses are provided in Appendix F of the review report.

Shortly after the end of the second comment period, the federal Clean Air Mercury Rules were vacated and DEQ initiated a rulemaking to develop state rules that were independent of the federal rules. In addition, the DEQ anticipated that regional haze rules that would include Best Available Retrofit Technology requirements for the facility would be adopted in 2008. Issuance of the permit was postponed to include the mercury and regional haze requirements that will require significant reductions in emissions. The mercury and regional haze rules were adopted on

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Notice Issued: July 23, 2010
By: Nancy Swofford

June 19, 2009. The draft permit has been revised to include the newly adopted requirements. The DEQ is proposing to decrease the emission limits in the renewal permit for sulfur dioxide and nitrogen oxides as a result of acid rain and regional haze requirements.

Further information about this facility is viewable online at:

www.deq.state.or.us/er/PGE.htm

Permit expiration

Oregon law requires facilities with a Title V permit to renew that permit every five years. Upon renewal, this permit will expire Sept. 1, 2015.

Who is the applicant?

Portland General Electric Company (PGE)
121 SW Salmon Street
Portland, OR 97204

Where is the facility located?

73334 Tower Road
Boardman, OR 97818
(approximately 13 miles southwest of Boardman)

Who might have an interest?

People who work, live, and recreate in the area.

What does PGE do that affects air quality?

PGE operates a coal-fired electric generating unit. Coal is burned in a boiler to produce steam to generate electricity. A single Foster Wheeler dry bottom, wall-fired boiler provides steam to a Westinghouse turbine/generator. A small Combustion Engineering oil-fired package boiler provides startup steam. In addition to the combustion devices, the site contains maintenance facilities, coal storage and handling facility, and an ash handling and disposal facility.

PGE's Boardman plant releases particulate matter, sulfur dioxide, nitrogen oxide, carbon monoxide, volatile organic compounds, and hazardous air pollutants to the air.

What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216 and 218 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200 through 268 contains all pertinent rules that govern the air quality program.

How does DEQ determine what requirements go in the permit?

Various federal and state regulations apply to a facility depending on the type of industry, the type and amount of pollutants emitted, and the location of the facility. All applicable regulations must be contained in the permit, including the appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

Meeting air quality standards

Air quality in Morrow County meets the National Ambient Air Quality Standards established by the US Environmental Protection Agency to protect public health. DEQ has determined that the air emissions from PGE as a result of this permit action will not result in a violation of those standards. DEQ is responsible for establishing permit emissions limits that ensure air quality standards are not violated. The plant is located within 200 kilometers of several wilderness areas and national parks (Class I areas). The closest Class I area is the Mt. Hood Wilderness Area. An analysis of the impacts on these areas is not required for this permit action because PGE has not requested an increase in the plant site emission limits.

What pollutants are regulated by air permits?

EPA and DEQ use six key pollutants as indicators of air quality. These are known as "criteria pollutants" and are compounds that, if inhaled, may lead to health effects that generally aggravate cardiovascular and respiratory disease. If the amount of criteria pollutants emitted is greater than a regulated minimum, then emission limits are established.

Hazardous air pollutants are compounds that, if inhaled, may pose a threat to human health, including for example, cancer, birth defects, or reproductive dysfunction. The mere presence of these pollutants in the air does not necessarily mean that a health risk exists. EPA has established a list of 187 compounds that are classified and regulated as hazardous air pollutants.

For more information about criteria pollutants, go to:

[Air Quality Annual Report and Data Summaries](#)

For more information about hazardous air pollutants, go to:

[Health Effects Notebook for Hazardous Air pollutants \(US EPA\)](#)



How are permitted substances measured?

DEQ requires this facility to continuously monitor sulfur dioxide, nitrogen oxide and carbon dioxide emissions. The permittee is required to conduct routine testing for particulate matter emissions. Other pollutant emissions are calculated based on plant operating data and emission factors. The permittee is required to keep annual records of the type and total amount of fuel burned, boiler hours of operation, excess emissions, and pollutant emissions for each 12 consecutive month period. DEQ also requires the facility to submit compliance certifications semi-annually, emissions reports annually and excess emissions immediately upon occurrence. DEQ inspects facilities at least every two years to assure compliance with the emission limitations.

Emissions and permit limits

Table 1 below presents the maximum allowable emissions for the facility. The current emission limit reflects the maximum amount of emissions the facility can emit under its existing permit. The proposed emission limit reflects the maximum emissions the facility is allowed to emit under the proposed permit. Typically, a facility's actual emissions are less than the maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 2 summarizes the significant hazardous air pollutants the source emits. EPA and DEQ use the term "major source" to describe facilities such as PGE Boardman because of the amount of hazardous air pollutants they emit. As a major source, it is subject to National Emission Standards for Hazardous Air Pollutants for reciprocating internal combustion engines and industrial, commercial, and institutional boilers and process heaters. Once EPA promulgates a maximum achievable control technology standard for coal-fired electric generating units in 2011, they will be added to the permit. More detailed information can be found in the review report.

Compliance history:

DEQ's regular inspections of this facility have shown it to be in compliance with all permit conditions. DEQ received five complaints about the facility during the last permit cycle, and discusses the complaints and resolution or cause in the review report. DEQ issued a Notice of Noncompliance and warning letters for violations of failing to notify DEQ of excess emissions within the one hour limit for such notification. All violations were resolved. The review report includes a discussion of excess

emissions that have occurred during the last permit cycle.

What are the special conditions of this permit?

The permit includes new requirements for reducing mercury and visibility impairing pollutants based on rules recently adopted by the EQC. Nitrogen oxide emissions must be reduced in 2011; mercury emissions in 2012; and, sulfur dioxide emissions in 2014. The permit includes some discretionary monitoring requirements under the authority of the periodic monitoring requirements of the Title V program for assuring compliance with the emission limits and standards.

What other DEQ permits are required?

DEQ also requires a Water Pollution Control Facility permit. The permit number is # 100189.

What other sources of air pollutants are in the vicinity of the facility?

Various sources emit similar air pollutants. EPA and DEQ split up the sources into three categories: point, area, and mobile sources. Point sources are primarily large industrial facilities. Area sources are smaller than point sources and include backyard burning, woodstoves, consumer products, gasoline stations, etc. Mobile sources include cars, trucks, airplanes, ships, railroads, and construction equipment. There are three other power plants in the Boardman/Hermiston area.

What other information about this company is related to this permit?

PGE owns and operates power plants at the Port of Morrow in Boardman, as well as another plant in Clatskanie.

What happens after the hearing?

After the comment period closes, DEQ will consider and provide responses to all comments received. While DEQ may modify provisions in the proposed permit, the agency can modify conditions of the permit only in accordance with the rules and statutes under DEQ's authority. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. When a facility meets all legal requirements, DEQ issues a facility's air quality permit following EPA review.

After the public comment period, DEQ sends the proposed permit to EPA. EPA has 45 days to review the proposed permit and submit objections to DEQ in writing. If EPA has no objections, any person may petition EPA with an objection during the following 60 days. A petition may only be based on objections already

raised during the public comment period, unless the person submitting the petition can demonstrate it was impossible or impractical to do so, or that new information is now available to justify a new objection.

Accessibility information

DEQ is committed to accommodating people with disabilities at our hearings. Please notify DEQ of any special physical or language

accommodations or if you need information in large print, Braille or another format. To make these arrangements, contact DEQ Communications and Outreach (503) 229-5696 or toll free in Oregon at (800) 452-4011; fax to 503-229-6762; or e-mail to deqinfo@deq.state.or.us.

People with hearing impairments may call 711.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)	Future Limit* (tons/yr)
Particulate Matter (PM/PM ₁₀)	1,056	1,056	346
Nitrogen Oxides (NO _x)	12,687	11,672	5,836
Sulfur Dioxide (SO ₂)	30,450	30,450	3,045
Carbon Monoxide (CO)	767	767	767
Volatile Organic Compounds (VOC)	92	92	92
Lead	0.17	0.17	0.17

*The proposed limits will be in effect once the permit is issued. The future limits will be in effect once the pollution control devices required by the regional haze program are installed.

Table 2

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Hydrogen Chloride	53
Hydrogen Fluoride	38
Mercury (current)	0.17
Mercury (2012)	0.017
Other HAPs (metals and organics)	17