

Request for Comments

Proposed Issuance of a Standard Air Contaminant Discharge Permit for Lakeview Cogeneration LLC



State of Oregon
Department of
Environmental
Quality

The purpose of this notice is to invite you to provide written comments on this proposed air quality permit issuance.

DEQ's Role:

The Oregon Department of Environmental Quality (DEQ) 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 27, 2010**

A Public Hearing has been scheduled for August 23, 2010 in Lakeview. A hearings officer will take written and oral comments. People can comment in writing on the proposed permit until August 27, 2010.

Public Hearing Details:

A brief information session begins at 6:00 p.m. with the formal hearing immediately following the information session.

Monday, **August 23, 2010**, 6:00 p.m.
Lake County Senior Center
11 North G Street
Lakeview, OR 97630

Where can I send my comments?

Nancy Swofford, Permit Coordinator
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
(541) 633-2021 or 866-863-6668 (Toll Free)
Fax: (541) 388-8283
Email: [Nancy Swofford](mailto:Nancy.Swofford@deq.state.or.us)

Where can I get technical information?

Mark Fisher, Permit Writer
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
(541) 633-2022 or 866-863-6668 (Toll Free)
Fax: (541) 388-8283
Email: [Mark Fisher](mailto:Mark.Fisher@deq.state.or.us)

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](#)
[Detail Sheet](#)

You can review hard copies of the draft permit and related documents at Lake County Library located at 513 Center Street in Lakeview and the DEQ office in Bend. For a review appointment, call Nancy Swofford at (541) 633-2021.

What is proposed?

DEQ proposes to issue an air permit for Lakeview Cogeneration LLC 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.

Since this will be a new permit, all conditions are new to this facility.

Permit expiration

Oregon law requires facilities with a Standard Air Contaminant Discharge Permit to renew that permit every five years. Upon issuance, this permit will be effective for five years, expiring on Sept. 1, 2015.

Who is the applicant?

Lakeview Cogeneration LLC
1125 NW Couch, Suite 700
Portland, OR 97209

Where is the facility located?

Corner of Missouri Avenue & Roberta Road
Lakeview, OR 97630

The source is not located within 10 kilometers of any Class I Air Quality Protection Areas.

Who might have an interest?

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

What does Lakeview Cogeneration LLC do that affects air quality?

Lakeview Cogeneration LLC releases Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen

Eastern Region Air Quality

475 NE Bellevue Dr., Ste. 110
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Permit Writer

E-mail:
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Website:
www.oregon.gov/DEQ

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subscriptions@deq.state.or.us

Please include your full name, e-mail address and mailing address so that we can purge you from our print mailing list, thus saving trees and taxpayer dollars.

Notice Issued: 07/23/2010
By: Nancy Swofford

Oxide (NO_x), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Hazardous Air Pollutants, etc. to the air.

What legal requirements apply?

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

The biomass boiler is subject to the New Source Performance Standards (NSPS) (40 CFR part 60, subpart Db) for electric steam generating units with heat inputs greater than 250,000 MMBtu/hr.

The emergency generator and fire pump are subject to the NSPS for compression ignition internal combustion engines (40 CFR Part 60, subpart IIII). They are also subject to the National Emissions Standards for Hazardous Air Pollutant (NESHAP) for stationary reciprocating internal combustion engines (40 CFR Part 63, subpart ZZZZ).

EPA proposed a NESHAP for industrial, commercial and institutional boilers in June 2010 for both major and area sources of hazardous air pollutants. The Lakeview Cogeneration project is a minor source of HAPs, so the standards for area sources will be incorporated into the permit when the NESHAP is finalized (40 CFR Part 63, Subpart JJJJJ).

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

The source is located in an attainment area for PM_{2.5}, SO₂, NO_x, CO and ozone, and a maintenance area for PM₁₀.

Lakeview Cogeneration LLC is located in the Town of Lakeview which is considered an Oregon recognized maintenance area for PM₁₀. The source meets industrial requirements set forth in the maintenance plan and DEQ's rules. Additionally, the source is located in an area that has exceeded US Environmental Protection Agency (EPA) standards for PM_{2.5}. However, Lakeview is not yet considered a US EPA designated nonattainment area for PM_{2.5} and

there are no special PM_{2.5} rules at this time for new industrial sources to locate in Lakeview. In addition, the Lakeview Cogeneration project, as proposed, will not have significant emissions of PM_{2.5}. Air quality in Lakeview is considered unclassified by the US EPA for SO₂, NO_x, CO and ozone because DEQ is not monitoring for these pollutants in Lakeview. DEQ only conducts monitoring for a specific pollutant in areas that are considered to potentially have problems with air quality. DEQ is responsible for establishing permit emissions limits that ensure air quality standards are not violated.

What pollutants are considered in determining permitted limits?

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 (HAPs) are compounds that, if inhaled, may pose a threat of adverse human health or environmental effects, including, for example, acute or chronic toxicity, 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 HAPs. If the amount of HAPs released is greater than a regulated minimum level, then additional requirements may also apply.

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 the permitted substances measured?

The permittee is required to keep annual records of steam production, summary of annual pollutant emissions determined each month, records of excess emissions, summary of complaints, a list of permanent changes and major maintenance performed. Formulas to calculate emissions are contained in the permit. The permittee is required to calculate facility-wide emissions and submit an emissions report



semi-annually. Onsite inspections will be conducted to assure compliance with emission limitations.

Emissions and permit limits

Table 1 below presents the maximum allowable emissions for the facility. 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.

Regulations do not require plant site emission limits of hazardous air pollutants, but Table 2 below shows the maximum projected emissions of hazardous air pollutants.

Compliance history:

This is a new source.

What other DEQ permits are required?

No other permits have been issued or are required by the Department of Environmental Quality for this source.

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 3 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.

What happens next?

DEQ will consider and provide responses to all comments received at the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility’s air quality permit.

Accessibility information

DEQ is committed to accommodating people with disabilities. 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 & 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.

Criteria Pollutant	Proposed Limit (tons/yr)
Particulate Matter (PM)	24
Small Particulate Matter (PM ₁₀)	14
Fine Particulate Matter (PM _{2.5})	9
Nitrogen Oxides (NO _x)	229
Sulfur Dioxide (SO ₂)	39
Carbon Monoxide (CO)	233
Volatile Organic Compounds (VOC)	39

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Hydrogen Chloride	8.17
Styrene	2.90
Methanol	1.27
Chlorine	1.21
<u>Total Hazardous Air Pollutants</u>	<u>15.2</u>

