



Invitation for Public Comment Notice of Two Public Hearings

Hearing Times/Locations:
6 to 9 pm May 16, 2007
Port of Morrow
2 Marine Drive
Boardman, Oregon

AND

6 to 9 pm May 31, 2007
DEQ Headquarters
Room EQC A (10th Floor)
811 SW Sixth Avenue
Portland, Oregon

DEQ Office location:
300 SE Reed Market Road
Bend, OR 97702

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Documents may be viewed at the
DEQ office listed above, and at:

Oregon Trail Library District
200 S. Main Street
Boardman, Oregon

And

DEQ, Bend Office
300 SE Reed Market Road
Bend, Oregon

If you are viewing this notice on the
internet, you can view the documents
by clicking on the following links:

[Draft Permit](#)
[Review Report](#)
[Testimonies – Portland](#)
[Testimony – Boardman](#)
[Written Comments](#)
[PEAC Comments](#)
[NSR Letter](#)

Comments due by: **June 15, 2007**

Mail to: **300 SE Reed Market
Road, Bend, OR 97702**

E-Mail to: [Bonnie Hough](#)

*DEQ is committed to accommodating
people with disabilities. Please notify
us with any specific needs, including
alternate formats, to assist your
review or to make comments.*

Proposed Oregon Title V Air Operating Permit and Acid Rain Permit Renewal for Portland General Electric Company Public Comments Extended: From April 11, 2007 – June 15, 2007

Hearings to be held:

**May 16, 2007 from 6 pm to 9 pm at the Port of Morrow, 2 Marine
Drive, Boardman, Oregon**

AND

**May 31, 2007 from 6 pm to 9 pm at the Department of
Environmental Quality Headquarters, Room EQC A on the 10th
Floor, 811 SW Sixth Avenue in Portland, Oregon**

What is being proposed?

DEQ is planning on renewing an air 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. Large industrial sources of air pollution such as **Portland General Electric Company** are required to have an air quality permit issued by DEQ, which is referred to as a Title V permit. Permits are issued by DEQ to regulate the type and amount of air emissions at a regulated facility. Oregon law requires facilities with a Title V permit to renew that permit every five years. Upon renewal, this permit will be effective for five years. There are no increases in the Plant Site Emission Limit in the proposed permit renewal, however, the Department is proposing to decrease the emission limits in the renewal permit for Nitrogen Oxides due to the Acid Rain emission limit.

The current permit was scheduled to expire on July 1, 2006. A timely and complete application was submitted to the Department on June 22, 2005, so the current permit will remain in effect until the permit renewal is issued. A draft of the permit renewal was released for public comment on April 27, 2006. Public hearings were held on June 15, 2006 in Boardman, Oregon and on June 28, 2006 in Portland, Oregon. The comment period ended on July 7, 2006. A summary of the comments and the Department's response is available with the draft permit and review report. One of the people who commented pointed out a procedural error, so it was decided that the comment period should be reopened. At the same time, the Environmental Quality Commission (EQC) was about to take final action on a rule that would limit mercury emissions from coal fired power plants. Therefore, it was decided to hold off on the comment period until the mercury rule would be finalized and the requirements could be included in the permit renewal. This draft includes the mercury rules.

The draft permit, review report, public comments received during the first public notice and the Department's responses to the comments are available at the locations listed to the right or if you are viewing this hearing notice on the Internet, by clicking on the links in the sidebar to the right.

Where is the facility located?

The facility is located on Tower Road near Boardman, Oregon.

What does Portland General Electric Company do that affects air quality?

The basic operating scenario for the Boardman plant is burning fossil fuel (coal) in the main boiler making steam to generate electricity. A single Foster Wheeler pulverized coal fired boiler provides steam to a single Westinghouse turbine generator. A small Combustion Engineering oil fired package boiler provides startup steam. In addition to the boiler/turbine buildings, the site contains maintenance facilities, a coal storage/handling facility, and an ash handling/disposal facility.

Meeting Air Quality Standards

Air quality in Morrow County meets the standards established by the US Environmental Protection Agency (EPA) to protect public health. DEQ has determined that the air emissions from the Portland General Electric Company facility will not result in a violation of those standards. DEQ is responsible for ensuring that the emission limits established by the facility’s permit are not exceeded.

What other DEQ permits are required?

Other permits issued or required by the Department of Environmental Quality for this source include a Water Pollution Control Facility Permit.

What pollutants are measured to determine limits?

EPA and DEQ use six key pollutants as indicators of air quality. These are known as “criteria pollutants” and are pollutants for which emission limits are established if emissions are greater than a regulated minimum level.

Permit emission limits

The adjacent table presents the maximum allowable emissions for the facility. The Current Emission Limit reflects the maximum amount of emissions the facility can currently emit under their existing permit. The Proposed Emission Limit reflects the maximum amount of emissions the facility would be able 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.

Criteria Pollutants	Current Emission Limit (tpy)	Proposed Emission Limit (tpy)
Particulate Matter (PM) / Small Particulate Matter (PM ₁₀)	1056	1056
Nitrogen Oxides (NO _x)	12687	11672
Sulfur Dioxide (SO ₂)	30450	30450
Carbon Monoxide (CO)	767	767
Volatile Organic Compounds (VOC)	92	92
Lead (Pb)	0.17	0.17
tpy stands for tons per year		

Hazardous air pollutant emissions information

The facility is a major source of Hazardous Air Pollutants (HAP) emissions. The total potential estimated HAP emissions are 107.9 tons per year with hydrogen chloride and hydrogen fluoride being 53.3 and 38.3 tons; respectively. The HAP emissions are primarily products of incomplete combustion or due to trace elements (e.g., metals) contained in the coal. The permittee conducted mercury testing in August of 2006. The average results were 6.6 lbs/trillion Btu heat input and 0.038 lbs/hour. The plant only operated 4,544 hours in 2006, so the mercury emissions were 173 lbs for the calendar year, assuming the hourly emissions would be constant for each hour of operation. The mercury content in the coal can vary considerably, so it is likely that the emissions were higher or lower than this estimate. If the plant had operated the entire year, the emissions would have been approximately 333 lbs for the calendar year, again assuming that the hourly emissions would be constant.

What is Portland General Electric Company’s compliance history?

DEQ has inspected this facility on a regular schedule and has consistently found them to be in compliance with all permit conditions. The Department received 5 complaints related to the facility during the last permit cycle. The complaints and the resolution or cause are discussed in the review report. In addition, the Department issued a Notice of Noncompliance for a violation that was the result of PGE failing to provide immediate notification of an excess emission event. The violation was resolved and has not occurred again. Finally, the review report also includes a discussion of excess emissions that have occurred during the last permit cycle.

Are there any special considerations associated with this permit?

- 1) This facility is subject to the Mercury Rules for Coal Fired Power Plants adopted in December 2006 by the Environmental Quality Commission in OAR Chapter 340, Division 228. The rules have two provisions. The first provision is a federal Mercury Budget Trading Program that will be in effect until January 1, 2018. The second provision contains specific emission limits that will be effective in 2012, but have a provision for a one year extension to 2013, if necessary. The rules require that mercury emissions be reduced by 90% or to a level of 0.60 lb/trillion Btu by 2012, or 2013, if an extension is granted. The permittee must install and certify mercury emissions monitoring equipment by January 1, 2009 and submit a plan for installing

pollution control equipment by July 1, 2009. The provision for a compliance extension was included in the rule in the event that pollution control equipment is not available due to supply limitations or other circumstances that are beyond the control of the owner or operator. In 2018, the emissions will be capped at 60 lbs/year, if there are no new coal fired power plants, or 35 lb/year if there are new coal fired power plants in Oregon and trading will no longer be allowed.

- 2) There are no proposed emission increases for any pollutants in this permit action. The state's Significant Emission Rate (SER) is considered to be the point at which adverse air quality impacts may occur. PGE performed dispersion modeling when initially permitted in 1979. The model predicted that the pollutant emissions would not cause ambient concentrations to exceed the National Ambient Air Quality Standards or Prevention of Significant Deterioration increments. In addition, PGE conducted post construction monitoring at the location of highest predicted impacts. Measured SO₂ concentrations were less than the levels predicted by the model.
- 3) The facility is not located within 100 kilometers of a Class I air quality protection area.
- 4) The source is not subject to regulations for New Source Review (NSR) or Prevention of Significant Deterioration (PSD). 40 CFR Part 63, Subpart ZZZZ applies to reciprocating internal combustion engines (RICE) and there is an emergency diesel generator at that plant. However, existing emergency stationary RICE do not have to meet the requirements of Subpart ZZZZ and Subpart A of Part 63. No initial notification is necessary. Although not required, PGE submitted an initial notification. 40 CFR Part 63, subpart DDDDD applies to industrial, commercial, and institutional boilers and process heaters and there is an auxiliary boiler at the plant. The auxiliary boiler meets the definition of an existing large and limited use liquid fuel unit so the only requirement is an initial notification which PGE has submitted.
- 5) Federal regulations (40 CFR 51.308) require that states evaluate and establish (if appropriate) BART emission limits for emissions units installed between 1962 and 1977 at sources within 26 specific source categories. PGE Boardman is subject to the BART rules because it is a coal fired electric generating plant and construction of the plant commenced in 1975. There are three steps in establishing BART emission limits. The first step is to model the emissions from the source to determine if the impacts are greater than 0.5 deciview at any Class I wilderness area or National Park. A deciview is a measure of visibility and 0.5 deciview is a change in visibility that can be perceived by about 50% of the population while 1.0 deciview is a change that can be perceived by nearly everyone. The next step in the process is to determine appropriate BART controls. "In this analysis, the state must take into consideration the technology available, the costs of compliance, the energy and non-air quality environmental impacts of compliance, any pollution control equipment in use at the source, the remaining useful life of the source, and the degree of improvement in visibility which may reasonably be anticipated to result from the use of such technology." [40 CFR 51.308(e)(1)(ii)(A)] The final step in the process involves promulgating a rule containing the BART emissions limits and submitting the rule to EPA for approval. Once the rule is finalized, the requirements will be incorporated into the Title V permit.

How do I participate?

DEQ welcomes your questions and comments. A copy of the proposed permit, permit application, and related documents are available at our **Bend Office** and the **Oregon Trail Library District**. You may also contact us directly, see contact information at right on first page, for more information. Written comments are due by 5:00 p.m. on **June 15, 2007**. We accept comments in writing, by e-mail, or in person during the scheduled public hearing. You may view the documents at the locations listed on the first page or if you are receiving this notice via the internet, you can view the documents by "control" clicking the links on the right had side of the first page of this notice.

What happens next?

After the comment period closes, DEQ will consider all comments received. DEQ may modify provisions in the proposed permit based upon comments received. **Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit following EPA review.**