

PSEL Overview

Plant Site Emission Limit History

- Oregon program is unique
- Rules were adopted in 1981
- Key components
 - Plant Site Emission Limits
 - Fixed baseline year(1977/78)
 - Netting basis (codified in 2001)
- EPA approved program



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PSEL Overview

Purpose

- Airshed management
 - Regulating increases and decreases from stationary sources
 - Assuring compliance with NAAQS and increments
 - Offsets and banking
- Program applicability



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PSEL Overview

DEQ's NSR/PSD rules differ from EPA's regulations:

- Lower major source thresholds, so smaller new sources and changes to smaller existing sources are subject to review.
- Plant-wide cap approach to defining major modification rather than a contemporaneous net emissions increase approach. Some changes subject to review under EPA's rules are not subject under DEQ's rules and vice versa.



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PSEL Overview

DEQ's NSR/PSD rules differ from EPA's regulations (cont):

- Accumulation of all emissions increases and decreases from physical changes or changes in the method of operation since the baseline year or last major source permit, whichever is more recent, rather than just during a “contemporaneous” time period. This creates an incentive to voluntarily reduce emissions in order to avoid triggering NSR/PSD.



PSEL Overview

DEQ's NSR/PSD rules differ from EPA's regulations (cont):

- PSEL and netting basis reduced if emission reductions at the sources occur and make the caps excessively high.
- PSEL also eliminates the possibility of a gradual increase of emissions over time by piecemeal projects not triggering NSR/PSD (not contemporaneous like federal rules)



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DEQ's NSR/PSD rules differ from EPA's regulations (cont):

- Changes which would result in increased emissions $>$ SER, but not considered modifications under EPA's rules, are reviewed for compliance with standards and increments under DEQ's PSEL program.



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PSELS in Permits

- Criteria pollutants and precursors
- Pollutants with a significant emission rate
- PSELS are not required for HAPs
exception for synthetic minors



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Initial PSEL

- Generic PSEL
 - Actual emissions $<$ significant emission rate (SER)
- Source specific PSEL where actual emission $>$ SER equals the lesser of:
 - Potential to emit or Netting basis



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Adjusting PSEL

- Corrections due to better information
 - Source test data
 - Emission factors
- Increases
- Decreases



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Increase PSEL

- <SER - No additional requirements
- >SER - Air quality analysis or NSR

Decrease PSEL

- Synthetic minor to avoid being subject to a regulatory program
- Decrease in capacity
 - Emission reduction credits
 - Unassigned emissions



PSEL Overview

PSEL Compliance Monitoring

- Continuous emissions monitoring systems
- Material balance
- Emission factors x production or throughput
- Hours of operation



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