

Department of Environmental Quality



# Oregon's Implementation of the Area Source NESHAPs

National  
Association of  
Clean Air  
Agencies

Spring  
Membership  
Meeting

May 17-19, 2010



**Andy Ginsburg, Administrator**  
**Oregon Department of Environmental Quality**



# Why Implement the Area Source NESHAPs?

- **Protect public health**
- **Increase compliance**
- **Provide assistance to affected businesses**
- **Ability to be flexible and responsive**
- **Opportunity to prevent need for enforcement**





# What Are The Barriers?



- **Many previously unpermitted sources**
- **Many are small businesses**
- **Revenue and staffing**
- **Quality of some of the NESHAPs**



# How is Oregon Implementing the Area Source NESHAPs?

- **Adoption triggers state (non-Title V) permit requirement**
- **Simple and Standard Permits**
  - Apply to individual sources
- **General Permits**
  - Apply to multiple or categories of sources
- **Registration**
  - Alternative to permitting



# New General ACDP Fee Classes for Area Source NESHAPs

Fee Class	Annual Fee	Note
1	\$720	Existing
2	\$1,296	Existing
3	\$1,872	Existing
4	\$360	New
5	\$120	New
6	\$240	New



# Fee Class Assignments for Area Source NESHAPs

Category	Fee Class	Annual Fee
Gasoline Dispensing (stage I)	5	\$120
Dry Cleaners	6	\$240
Gasoline Dispensing (stage II)	4	\$360
Hospital Sterilizers	4	\$360
Wood Preserving	4	\$360
Clay Ceramics	1	\$720
Paint Stripping/Surface Coating	1	\$720
Plating and Polishing	1	\$720
Nonferrous Foundries	2	\$1,296
Metal Fabrication	2	\$1,296



# Registration – Alternative to Permitting

- Incentive to go beyond compliance
- Auto body shops - EcoBiz
- Dry Cleaner certification

Category	Permit Fee	Registration Fee
Auto Body	\$720	\$240
Dry Cleaners	\$240	\$180



# Department of Environmental Quality



[www.ecobiz.org](http://www.ecobiz.org)



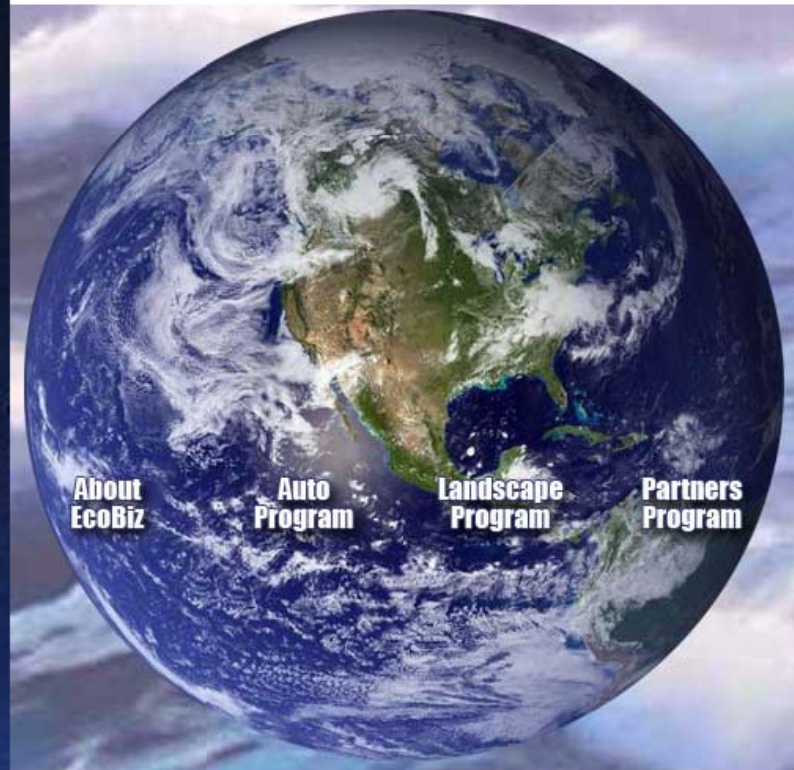
## Eco-Logical Business Program

Sponsored by the Pollution Prevention Outreach (P20)  
Team of the Portland, Oregon Metropolitan Area

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# Lessons Learned

- Anticipate business association objections
- Don't overestimate revenue
- Simplify and clarify
- Some work is unfunded
- Push back at permitting stage
- Keep legislators informed

