

Oakridge Industrial Park and Oakridge

Narrative Statement on Air Quality

Lane Regional Air Protection Agency – Agency Overview

The Lane Regional Air Protection Agency (LRAPA) was created in 1968 to improve and maintain air quality in Lane County. LRAPA implements federal, state, and local air quality programs in Lane County, Oregon. In addition to monitoring ambient air quality, LRAPA administers programs that educate the community about air quality issues; seek emissions reductions where air quality or public health concerns exist; and ensure compliance with air quality regulations.

Oakridge Air Quality

Although there are no longer any significant sources of industrial pollution in Oakridge, The City's Urban Growth Boundary was classified and designated as a moderate PM10 non-attainment area on January 20, 1994 by the United States Environmental Protection Agency (EPA). The EPA approved LRAPA's Oakridge PM10 attainment plan on March 15, 1999. The plan addresses residential wood combustion as the primary source of particulates in Oakridge, and includes measures to control particulate pollution and bring the area into attainment with the National Ambient Air Quality Standards (NAAQS).

On October 8, 2009, the Environmental Protection Agency (EPA) issued final area non-attainment designations for the 24-hour national air quality standards for fine particulate matter (PM2.5). An area containing Oakridge and Westfir was declared "non-attainment." Oakridge last exceeded the standard in 2011. LRAPA is currently working on a PM2.5 attainment plan.

LRAPA monitors ambient air PM10 and PM2.5 concentrations in Oakridge and manages a winter season smoke management program to notify homeowners when poor air quality conditions exist and wood burning is discouraged or prohibited. The air quality problem in Oakridge is somewhat unique. It is a result of weather, terrain, and economic conditions that result in seasonally (winter) high concentrations of wood smoke particulates. On the coldest nights, a temperature inversion keeps the smoke trapped at the lowest elevations. Unfortunately, it is on these coldest nights that many people choose to supplement their home heating with wood stoves and fireplaces. Compounding the problem is that for many Oakridge residents, a wood stove or fireplace is their only heat source.

Another consideration for businesses locating in Oakridge may be its proximity to Federal Clean Air Act designated Class I areas. The Diamond Lake and Three Sisters Wilderness areas are designated Class I areas. These federally protected areas were specifically designated as Class I areas by Congress in 1977 to protect visibility and the intrinsic scenic value of the areas. Impacts from human-caused air pollution on these areas must be considered during the permitting process. The regulations pertaining to Class I areas are included in the NSR/PSD regulations discussed below.

Air Quality Regulations

Air quality regulations and programs are numerous and complex, and depending on the nature of a facility, a source may be required to obtain pre-construction and/or operating permits that can include ambient air monitoring, modeling, and/or pollution mitigation measures. This narrative is provided as a brief summary of the permitting regulations that may apply to new sources of air pollution in Oakridge. However, owners or operators of businesses considering locating a new business in Oakridge are encouraged to contact LRAPA staff to discuss specific air quality regulations and programs that may apply to their facility prior to beginning construction.

Indirect source permits

Sources that contribute to significant increases in motor vehicle traffic may be required to obtain indirect source permits. One example of a source likely to require an indirect source permit is a facility that includes a large parking area for employee or customer parking. (For more information about Indirect Source Permits, contact Max Hueftle at 541.736.1056 x231)

Construction approval and State operating permits

Title 34 of LRAPA's rules and regulations contains the construction rules and procedures that apply to stationary sources of air pollution. New sources of air contamination are required to notify LRAPA prior to commencement of construction.

Title 37, Table 1, provides a list of the sources that are required to apply for and receive an Air Contaminant Discharge Permit (ACDP) from LRAPA prior to operation. Title 37 of LRAPA Rules and Regulations, including Table 1, is included in the Appendix. A new source whose operations fall into any category listed on Table 1 is required to apply for and receive an ACDP prior to operation of the new facility. This process may be straightforward or somewhat complex and time-consuming, depending on the complexity of the operations involved, the amount and nature of pollutants emitted, and the completeness of the information initially provided in the ACDP application. Sources that qualify for a Basic or General ACDP may be assigned right away to those permits. Simple or Standard ACDPs issued by LRAPA must be placed on public notice for at least 30 days prior to issuance. Therefore, applicants for new source permits should plan on a minimum of 90 days for application processing.

New Source Review and Prevention of Significant Deterioration

Large sources of particulate matter (e.g., smoke or dust) or other Federal Clean Air Act

criteria pollutants may be required to install and operate air pollution control equipment. In addition to installing pollution controls, sources subject to New Source Review (NSR) or Prevention of Significant Deterioration (PSD) regulations may be required to conduct ambient air monitoring and/or modeling to demonstrate that the added pollution from their facility will not contribute significantly to existing air quality problems or further degrade existing "good" air quality by creating new air quality problems. Whether or not source-specific pollution control requirements may be required depends on the types and amounts of pollutants emitted. The NSR and PSD requirements are found in Title 38 of LRAPA's rules and regulations. Complex NSR or PSD permit applications may take up to 180 days for processing, with additional time for public notice and outside agency reviews. A fact sheet on New Source Review/Prevention of Significant Deterioration Programs permitting is included in the Appendix.

Title V Operating Permits

In addition to Air Contaminant Discharge Permits, LRAPA also administers Oregon's Title V Federal Operating Permit program throughout Lane County. Under the Title V permit program, major sources of criteria or hazardous air pollutants are required to apply for and obtain a Title V operating permit. Information on Title V permitting thresholds and procedures is included in the Oregon Title V Operating Permits program fact sheet, which is provided in the Appendix.

Permit fees

The costs associated with permitting and compliance programs vary greatly from initial permitting costs of a few hundred dollars to upwards of forty thousand dollars or more for the largest, most complex sources. Title 37, Table 2, included in the Appendix contains the fees associated with LRAPA's ACDP program.

(For more information about Stationary Source Permitting Requirements and Procedures, contact Max Hueftle at 541.736.1056 x 231)

Small Business Technical Assistance

Although the regulations can be complex, LRAPA endeavors to provide a clear path to compliance from initial permitting, through construction, and during the ongoing operation of the source. This is accomplished by offering permitting and technical assistance to small businesses, pollution prevention and flexible permitting options to all sources, and encouraging innovative approaches to achieving compliance, using environmental management systems. Clean air is LRAPA's goal and the Agency is committed to working with new businesses to find cost-effective and efficient solutions to Oakridge's unique economic and air quality challenges.

(For more information about LRAPA's Business Assistance Programs, contact Max Hueftle at 541.736.1056 x 231)

Contact Information: LRAPA (541) 736-1056

Indirect Source Permits: Max Hueftle, ext. 231

Stationary and Industrial Source Permits: Max Hueftle, ext. 231

Small Business and Technical Assistance: Max Hueftle, ext. 231

Public Relations: Sally Markos, ext. 217

Appendix

Consult the LRAPA Website for the following:

- 1- Lane Regional Air Protection Agency "Who we are"
- 2- Title 34 of LRAPA Rules and Regulations
- 3- Title 37, including Tables 1&2
- 4- Title 38 of LRAPA Rules and Regulations
- 5- Oregon Title V Operating Permits (OAR 340, Divisions 218 & 220)

<http://arcweb.sos.state.or.us/pages/rules/index.html>

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