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*ODEQ Prevention of Significant  
Deterioration/Air Contaminant Discharge  
Permit Application*

Appendix D – Air Quality Impact Assessment

**Intel Corporation Gordon  
Moore Park at Ronler  
Acres/Aloha Project**



Submitted to  
Oregon Department of Environmental Quality

Submitted by



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# AIR QUALITY IMPACT ASSESSMENT

## INTRODUCTION AND PROJECT DESCRIPTION

Intel Corporation (Intel) operates the Gordon Moore Park at Ronler Acres (also referred to as Ronler and Ronler Acres in this document) and Aloha semiconductor manufacturing facilities (together, the Facility) in Washington County, Oregon. The Gordon Moore Park at Ronler Acres campus is located at 2501 NE Century Boulevard, Hillsboro, Oregon, which has a Universal Transverse Mercator (UTM) North American Datum (NAD) 83 coordinate of 506601.5 meters Easting, 5043404.5 meters Northing (Zone 10). The Aloha campus is located at 3585 SW 198th Avenue, Aloha Oregon, and has a UTM NAD 83 coordinate of 509003.2 meters Easting, 5037811.5 meters Northing (Zone 10) latitude /longitude of 122.8851359° W, 45.4937841° N. The Aloha campus has been operating since 1976 while the Gordon Moore Park at Ronler Acres campus began operation in 1994. Both campuses are engaged in the production of semiconductor products and are considered co-located for permitting purposes because their production activities are interrelated. Both campuses are regulated under a single Standard Air Contaminant Discharge Permit (ACDP), 34-2681-ST-01, issued by the Oregon Department of Environmental Quality (ODEQ) in 2016 and most recently modified in 2022.

The modeling report is part of the Type 4 Maintenance Area New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permit application. The application is in support of the proposed changes at the Facility which meet the definition of “major modification” in OAR 340-224-0025 (the “Project”). Changes at the Facility include additional fabrication (fab) cleanroom space and increased emissions at the existing fabs due to advances in technology manufacturing and additional manufacturing support operations. The proposed major modification triggers the Maintenance Area NSR requirements in OAR 340-224-0060 and the PSD requirements in OAR 340-224-0070. A common requirement of both sets of requirements is the need to demonstrate that the proposed changes will not cause or contribute to an exceedance of the National Ambient Air Quality Standards (NAAQS) and PSD increments. Modifications subject to Division 224 requirements must be permitted as Type 4 construction approvals.

This modeling supplement describes the modeling steps, methods and assumptions that were performed to support the Type 4 construction approval permit application. The modeling presented in this report is based on the modeling protocol that was submitted and then approved by the ODEQ on June 15<sup>th</sup>, 2023. The modeling protocol was also reviewed by the United States Environmental Protection Agency (EPA) Region 10, the United States Forest Service (USFS) and the United States Park Service (USPS). The modeling followed the methods presented in the ODEQ *“Recommended Procedures for Air Quality Dispersion Modeling”* (March 2022). Table 1 summarizes the proposed analyses on a pollutant specific basis. The modeling also followed procedures as summarized by the EPA Appendix W modeling guidelines. Additional guidance procedures are summarized below and throughout the text: EPA in its *“Guideline on Air Quality Models”* (including supplements), EPA Memorandum *“Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> National Ambient Air Quality Standard”* (March 2011), EPA Memorandum *“Clarification on the Use of AERMOD Dispersion Modeling for Demonstrating Compliance with the NO<sub>2</sub> NAAQS”* (September 2014) “ EPA Memorandum *“Guidance for Ozone and Fine Particulate Matter Permit Modeling”* (July 2022), EPA Memorandum *“Modeling Procedures for Demonstrating Compliance with PM-2.5 NAAQS (March 2010) and the California Air Pollution Control Officers Association (CAPCOA) “Modeling Compliance of the Federal 1-Hour NO<sub>2</sub> NAAQS”*(October 2011).



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Table 1 Air Quality Modeling Criteria					
	NO <sub>x</sub>	PM-10	PM-2.5	CO	SO <sub>2</sub>
<b>PSD Significant Impact Levels for Class I And Class II Areas</b>	x	x	x	x	
<b>Ambient Air Quality Standards</b>	x	x	x	x	x
<b>Class I and Class II Visibility and Deposition</b>	x	x	x		
<b>Impacts to Soils and Vegetation</b>	x	x	x	x	
<b>Class I and Class II Area Increment</b>	x	x	x		
The Project will also be major for VOCs; this analysis addressed ozone impacts from emissions of NO <sub>x</sub> and VOCs. Secondary formation of PM-2.5 and Ozone were also assessed with MERPS.					

A copy of the modeling protocol and the ODEQ protocol approval letter is included in Attachment A. All input and output modeling files will be provided to the ODEQ using an on-line share drive.

### Permit Applicability

The locations of the Gordon Moore Park at Ronler Acres and Aloha campuses are shown in Figure 1. The detailed site plans are presented in Figures 2 and 3, respectively. The Gordon Moore Park at Ronler Acres and Aloha campuses are located in Washington County, Oregon. The area in which the campuses are located is designated as attainment or unclassified for all criteria pollutants except carbon monoxide (CO) and ozone, for which the area is designated as maintenance.

The Facility is an existing source that will become a Federal Major Source as a result of the proposed changes because emissions of one or more regulated pollutants will increase above the Federal Major Source levels. A major modification at a facility that will become a Federal Major Source triggers the requirements of Oregon’s PSD permitting program for each pollutant for which the area is designated attainment or unclassified (OAR 340-224-0070(3)(a)(A)). These requirements include the obligation to conduct an air quality analysis for each regulated pollutant for which emissions will exceed the netting basis by a Significant Emission Rate (SER) or more. Based on the proposed Plant Site Emission Limits, the Facility is required to perform a PSD air quality impacts analysis in accordance with OAR 340-225-0070(3) for NO<sub>x</sub>, PM-10 and PM-2.5.

The proposed modifications also trigger requirements of Oregon’s Maintenance Area NSR program because it is located within the Oregon portion of the Portland-Vancouver Interstate Maintenance Area for ozone and the Portland Maintenance Area for CO, and the proposal constitutes a major modification for CO and ozone precursors (VOC and NO<sub>x</sub>). Maintenance area NSR requirements are triggered for each major modification of a maintenance pollutant. Major modifications for ozone precursors (NO<sub>x</sub> and VOC) constitute major modifications for ozone. A major modification of a maintenance pollutant must comply with the maintenance area NSR requirements at OAR 340-224-0060, including the requirement to demonstrate that it will not cause or contribute to an exceedance of the NAAQS. The Facility will meet its NAAQS compliance obligation in part by ensuring a net air quality benefit in compliance with OAR 340-224-0060(2) by offsetting its CO, NO<sub>x</sub> and VOC emissions via an allocation from the growth allowance



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program. In addition, the Facility modeled its CO emissions and evaluated ozone impacts, which are independent of the net air quality benefit resulting from offsetting those emissions.

ODEQ requires sources<sup>1</sup> to demonstrate compliance with the short-term NAAQS (specifically, 24-hr PM-10 and PM-2.5, 1-hr SO<sub>2</sub> and 1-hr NO<sub>2</sub>) if the Facility's Project triggers NSR for any pollutant and the Facility-wide short-term emissions are greater than the Significant Emission Threshold (SETs). This project triggers those requirements for short-term NAAQS. Thus, the short-term NAAQS evaluation for NO<sub>2</sub>, PM-10 and PM-2.5 as required by the PSD and Maintenance Area NSR regulations described above was performed. Although the project SO<sub>2</sub> emissions do not require an air quality assessment under the PSD regulations, the short-term Facility wide SO<sub>2</sub> emissions are over the SO<sub>2</sub> SET of three (3) pounds per hour (lbs/hr) and SO<sub>2</sub> NAAQS compliance was evaluated for 1-hr, 24-hr and annual averaging periods.

### Project Description and Source Emissions Data

The manufacturing process occurs in a cleanroom environment to avoid micro contamination of the product. Semiconductors are fabricated in batches of silicon wafers and can take anywhere from one to two months to manufacture. Semiconductor manufacturing begins with a silicon wafer substrate. The semiconductor is then built up as a series of layers, with material added or removed in each step. Steps include:

- Oxidation: Involves the generation of a silicon dioxide layer on the wafer surface to provide a base for the photolithography process. This layer also insulates and protects the wafer during subsequent processing.
- Lithography: Starts with the application of a photo sensitive layer onto the wafer. Then, a photomask is placed over the wafer and light is projected onto the wafer to form patterns of exposed and unexposed photoresist (e.g., the electrical pattern). After exposure, the wafer is developed in a solution that dissolves the exposed photoresist, leaving those areas exposed for subsequent processing steps. The unexposed photo-resistant coating remains on the wafer, thus protecting the surface.
- Ion Implant: Doping the wafer with ions to make it conductive or insulating at selected locations.
- Etching: Wet or dry etching techniques are used to remove unwanted material on certain areas on the wafer. After etching, photoresist is removed using dry or liquid stripping compounds.
- Deposition: Applies additional layers of silicon, silicon dioxide, or other materials to the wafer
- Planar: A surface treatment process which prepares the wafer for subsequent processing steps. A mildly corrosive chemical slurry is used as a polishing compound.

During the fabrication process, many of these steps are repeated multiple times in various sequences with variations in each step. Once the manufacturing is completed, the wafers are tested and cut into individual chips. The semiconductor chips are then sorted, assembled, tested, and packaged.

Manufacturing operations occur 24 hours a day and 365 days a year. However, production output varies with consumer demand and stage of process development.

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<sup>1</sup> See Oregon DEQ, "Short-Term NAAQS Compliance Internal Management Directive" signed September 1, 2021 and Oregon DEQ, "Recommended Procedures for Air Quality Dispersion Modeling", March 2022.



Figure 1  
Project Locations



Figure 2  
Gordon Moore Park at Ronler Acres General Arrangement

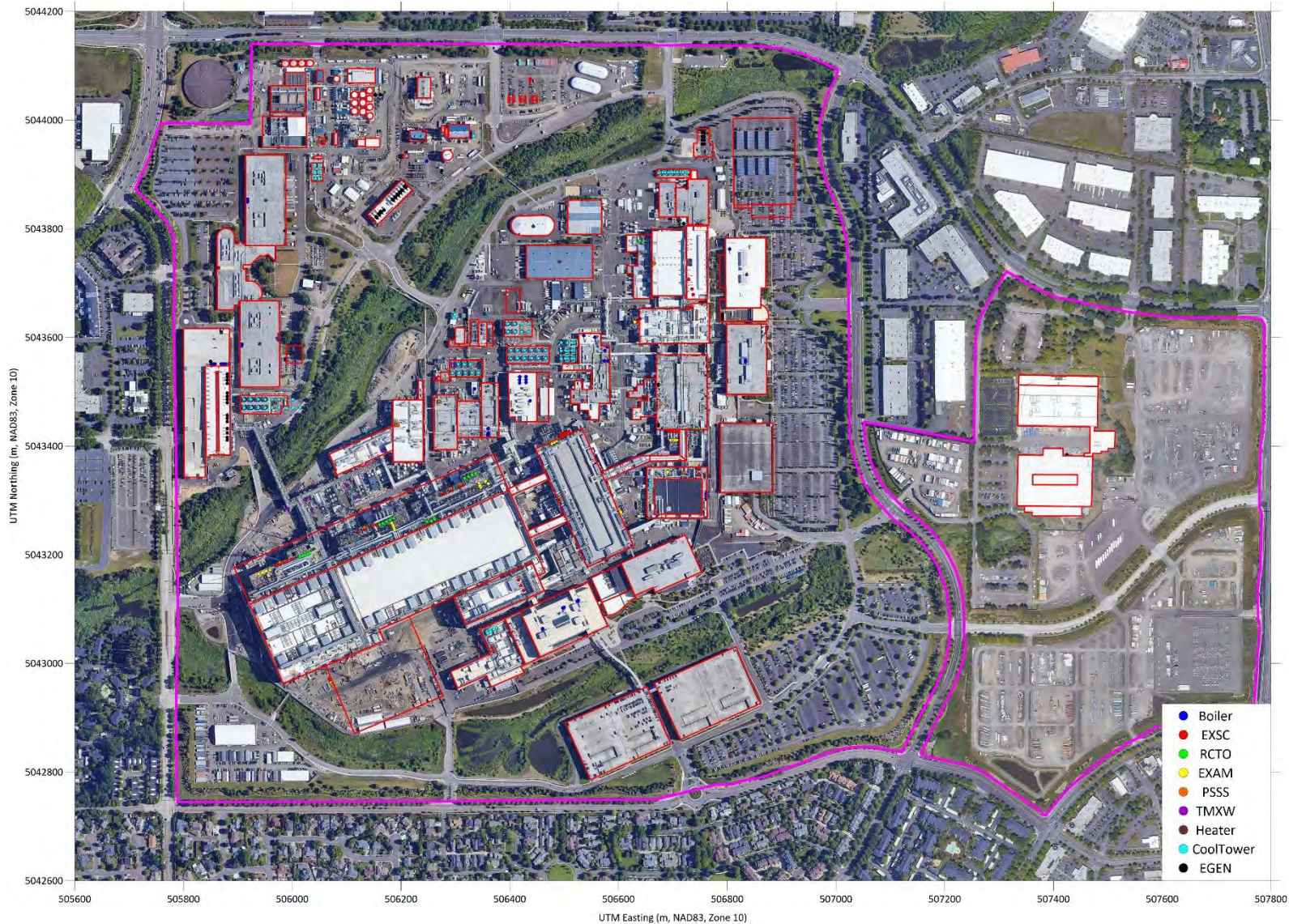
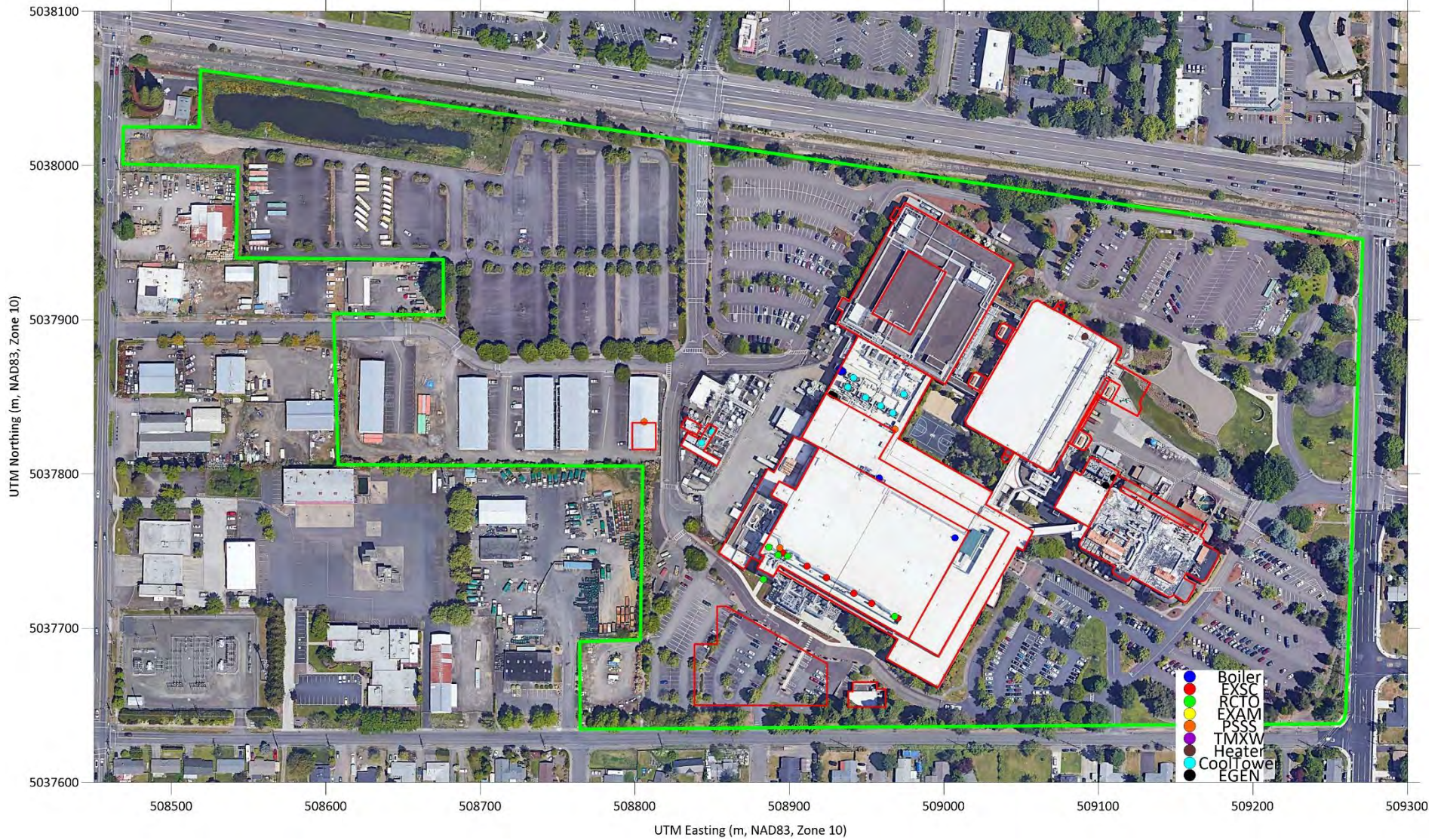


Figure 3  
Aloha General Arrangement



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There are a number of utility support systems that support Fab manufacturing operations. These include:

- Natural gas-fired rotor concentrator thermal oxidizers (RCTOs) are used to control volatile organic compounds (VOC) emissions from the Fabs.
- Packed-Bed Wet Chemical Scrubbers for controlling acid gases used in the Fab.
- Trimix Ammonia Treatment Systems are used to treat ammonia wastewater.
- Large natural gas-fired boilers (>2.0 million BTU per hour).
- Small natural gas-fired heating units and boilers (<2.0 million BTU per hour).
- Diesel-fired emergency generators and fire pumps.
- Wet cell cooling towers.
- Bulk Chemical Distribution including bulk and specialty gases.

Below is a summary description of the emission points that were used in the modeling analyses. Unless noted below, the sources operate 24 hours per day, 365 days per year.

### **Rotor Concentrator Thermal Oxidizers (RCTOs)**

RCTOs consist of two main components: a concentrator that uses zeolite wheels to adsorb VOCs from the Fab exhaust and a thermal oxidizer that oxidizes the VOCs into water and carbon dioxide. The RCTOs are a source of natural gas combustion byproducts, CO<sub>2</sub>, and VOCs that are not adsorbed by the zeolite concentrator. Each RCTO stack was included in the model as a point source. Some of the newer RCTOs exhaust to the acid scrubbers that then pass through a wet electrostatic precipitator (WESP) for additional PM control. A WESP works by charging particles as they enter the unit and collecting them on electrodes within the WESP body. Assumptions used in estimating RCTO air emissions include the following:

- Hourly emissions assume the RCTOs are operating at maximum rated capacity.
- Annual emissions are based on an annual operating capacity of 100% of the maximum rated capacity.
- All PM emissions are assumed to be PM-10 and PM-2.5.

### **Packed-Bed Wet Chemical Scrubbers (Scrubbers)**

Each Fab has several scrubbers that treat acid or ammonia-containing Fab process exhaust. The exhaust passes through a packed bed with reagent flowing through the bed. A substantial portion of the acid or ammonia gases in the exhaust are transferred out of the air stream into the reagent stream. The treated exhaust streams are then sent out to the atmosphere via a manifold with between one (1) and five (5) stacks.

### **Trimix Ammonia Treatment System (TMXW)**

The TMXW system is an ammonia wastewater treatment system that includes gas-phase ammonia abatement. Ammonia wastewater is pH adjusted and fed to an ammonia stripper. The ammonia stripper is a desorption process that removes ammonium ions out of the water to produce gas-phase ammonia. The gas-phase ammonia is exhausted to a two-stage thermal catalytic oxidation/reduction system. The first catalyst converts ammonia to NO<sub>x</sub> and CO to carbon dioxide. The second catalyst converts NO<sub>x</sub> to nitrogen and water. Air emissions from this system include natural gas combustion byproducts and ammonia. The air emissions exit to ambient air via a stack. Each emission point was modeled separately.

### **Boilers**

The boilers supply hot water to the various buildings and manufacturing processes. All of Intel's boilers are natural gas fired. Air emissions from the boilers are those associated with natural gas combustion. As a result of natural gas combustion, the boilers are a source of criteria pollutant emissions. Assumptions used in calculating boiler air emissions include the following:





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- Hourly emissions assume the boilers are operating at maximum rated capacity.
- Annual emissions are based on an annual operating capacity of 30%.

### **Emergency Generators and Fire Pumps**

In addition to backing up all critical Life Safety Systems, emergency generator back-up systems required by code and business continuity needs at the Facility, are located onsite, in the event of an unplanned primary power outage. The generators combust ultra-low-sulfur diesel and are routinely tested to ensure proper operation. For permitting purposes, air emissions are limited to periods when the emergency equipment is tested and maintained. The current permit specifies that no more than ten generators may be run in any single day and the generators can only be run during daylight hours, which is defined as the hours between 8 am and 6 pm. The emergency generators and fire pumps were modeled as described later in this report.

- Hourly emissions assume the engines are operated at full load.
- Annual emissions are based on the emergency generators operating for 25 hours per year.
- Annual emission for the fire pumps are all based on 50 hours per year.

### **Cooling Towers**

The Facility has mechanically induced (i.e., fan-driven) wet-cell cooling towers that are open to the atmosphere. The cooling towers are used to dissipate the large heat loads generated by the factory and the chilled water is used to condition the incoming air to the correct temperature required by the factory. The cooling towers are a source of particulate matter. The total dissolved solids (TDS) entrained in drift droplets emitted from the cooling towers are a source of PM emissions. Cooling towers were modeled in two specific ways:

- Cooling towers with a single fan were modeled using one stack located in the fan center and the maximum design flow and actual fan diameter were used for the stack parameters.
- Some of the multiple fans that are part of a single cooling tower assembly were modeled using a single stack located in the center of the assembly. The maximum design flow from the cooling tower assembly will be divided by the number of fans to get the representative flow. The diameter for the representative stack was assigned the diameter of a single fan.

### **Lime Silos**

Dry lime (calcium hydroxide) used in wastewater treatment operations is delivered to and stored in lime silos. There are five (5) lime silos on site. During filling, the silos are a source of PM emissions as air is displaced by the lime being loaded. Each silo is equipped with an exhaust vent, which is controlled by a fabric filter dust collector. For the five lime silo bin vents, PM-10 and PM-2.5 emissions from all five sources were modeled as a single volume source that was located midpoint between the existing lime silo bin vents. Assumptions used in the modeling include:

- Lime silos will only emit during loading operations which will occur no more than 1 hour per day with only one silo being loaded on any given hour or day. On an annual basis, there will be no more than 52 loading operations per year per silo.
- All emissions of particulate matter are assumed to be PM-10 and PM-2.5 in accordance with ODEQ guidance.



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## Paved Road Sources

Area source emissions, primarily associated with paved road emissions of particulate matter, created from the on-site road/vehicle travel was also included in the modeling assessments.

- Fugitive dust emissions are assumed to occur 24-hours per day and 8,760 hours per year.

## Stack Parameters

The stack parameters (flow rates, temperatures, stack heights, velocities) used in modeling were determined from source testing, manufacturing specification guarantees, or worst-case assumptions. These are listed in Attachment B.

## Emissions Summary

Based on the potential to emit emission summary provided in Table 2, the following pollutants are subject to air quality assessments as described in this report: Nitrogen Dioxide (NO<sub>x</sub>), Carbon Monoxide (CO), Sulfur Dioxide (SO<sub>2</sub>), Particulate Matter with an aerodynamic diameter of 10 microns or less (PM-10), Particulate Matter with an aerodynamics diameter of 2.5 microns or less (PM-2.5 and Volatile Organic Compounds (VOCs). NO<sub>x</sub> and SO<sub>2</sub> will also be treated as a precursor to PM-2.5 while NO<sub>x</sub> and VOC will be treated as an Ozone precursor.

Table 2 Ronler and Aloha Potential to Emit Summary							
Ronler and Aloha Plant Site Emission Limit Summary	NO <sub>x</sub>	CO	VOC	TSP as PM	PM-10	PM-2.5	SO <sub>2</sub>
	tpy	tpy	tpy	tpy	tpy	tpy	tpy
<b>Boilers</b>	19.69	58.64	8.55	3.89	0.81	0.67	4.04
<b>EGENS/Fire Pumps</b>	52.45	4.29	0.96	0.48	0.48	0.48	0.05
<b>RCTOs</b>	80.73	106.28	150.01	19.05	19.05	19.05	2.10
<b>EXSC Scrubbers</b>	192.68	327.92	36.92	28.25	27.25	25.65	26.77
<b>EXAM Scrubbers</b>	43.45	81.51	86.51	13.55	8.54	8.27	0.77
<b>PSSS Scrubbers</b>	0	0	0	0.71	0.44	0.001	0
<b>Fugitive VOCs</b>	0	0	65.82	0	0	0	0
<b>Heaters</b>	10.41	17.13	0.57	0.26	0.26	0.26	0.27
<b>TMXW</b>	12.23	1.10	0.20	0.09	0.09	0.09	0.09
<b>Lime Silos</b>	0	0	0	0.44	0.44	0.44	0
<b>Cooling Towers</b>	0	0	0	8.81	7.19	0.03	0
<b>Aggregate insignificant activities</b>	1.00	1.00	1.00	1.00	1.00	1.00	1.00
<b>Paved Road Emissions</b>	0	0	0	0.75	0.15	0.04	0
<b>Total</b>	412.6	597.9	350.5	77.3	65.7	56.0	35.1
<b>Current PSEL</b>	197.0	229.0	178.0	41.0	35.0	31.0	39.0



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<b>Requested PSEL<sup>a</sup></b>	402	580	349	67	57	55	39
<b>Increase</b>	205	351	171	26	24	25	0
<b>SER</b>	40	100	40	--	15	10	40
<b>Major Modification</b>	Yes	Yes	Yes	Yes	Yes	Yes	No
<b>Modeling Required</b>	Yes	Yes	NA	NA	Yes	Yes	Yes

<sup>a</sup> Requested PSEL not to include categorically insignificant Activities including Heaters, Paved Roads, and Cooling Towers

### PROPOSED AIR QUALITY DISPERSION MODELS

**Air Quality Models/Version:** The primary EPA dispersion model that was used is the AERMOD modeling system (AERMOD version 22112) with the associated meteorological and receptor processing programs AERSURFACE (version 20060), AERMET (version 22112), AERMINUTE (version 15272), and AERMAP (version 18081). AERMOD was used to quantify pollutant impacts on the surrounding environment based on the emission sources operating parameters and their locations and was used for modeling most Facility operational impacts in both simple and complex terrain. In addition, the Building Profile Input Program for PRIME (BPIP-PRIME version 04274) was used for determining building dimensions for downwash calculations in AERMOD. These models, along with options for their use and how they are used, are discussed below. These models were used for the following:

- Comparison of Facility impacts to Class I and Class II significant impact levels (SILs)
- Significant Monitoring Concentrations (SMCs)
- National Ambient Air Quality Standards (NAAQS)
- PSD Increments for 24-hour PM-2.5, PM-10 and annual NO<sub>2</sub>
- Cumulative impacts analyses in accordance with ODEQ and EPA modeling requirements, if required (project impacts greater than SILs)

### EXISTING METEOROLOGICAL AND AIR QUALITY DATA

Hourly observations of certain meteorological parameters are used to define the area's dispersion characteristics. This data is used in EPA approved air dispersion models for defining a project's impact on air quality. These data must meet certain criteria established by the EPA and the following discussion details the proposed data and its applicability to this Project.

**Project Location/Topography:** Both the Gordon Moore Park at Ronler Acres and Aloha Project sites are located in the Tualatin Valley which is a relatively flat river bottom area that is surrounded by terrain to the north, west and east. Very little variation in terrain exists in the valley until the area abuts the mountain ranges surrounding it on three sides.

**Nearby Surface Meteorological Stations:** The Gordon Moore Park at Ronler Acres site is located in the northeastern portion of the Tualatin Valley, approximately 2.25 kilometers (km) east of the Hillsboro Airport. The Aloha site is located approximately 6.5 km southeast of the Hillsboro Airport. The Hillsboro Airport (WBAN 94261) collects ASOS (Automated Surface Observing System) surface meteorological data such as wind speed and direction, temperature, pressure, cloud heights, and sky cover. ASOS surface



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meteorological data are generally selected for processing for AERMOD because ASOS hourly data are routinely recorded and archived, generally meet EPA data completeness criteria, instruments are located in unobstructed areas meeting EPA siting criteria, and instrument heights and sensor sensitivities meet EPA instrument specifications. Also, short-term (1-minute) wind direction and speed data are generally available that can be processed by EPA programs to eliminate excessive calm observations and to give hourly averages consistent with EPA modeling requirements. The ASOS surface data, when processed with AERMET as described below, result in data recovery greater than 90 percent for every quarter in the five-year period in accordance with EPA requirements “*Meteorological Monitoring Guidance for Regulatory Modeling Applications*,” (EPA-454/R-99-005). Generally, surface data parameters of wind speed, wind direction, and temperature must individually exceed 90% both by quarter and year, as well as wind speed, direction, and stability (turbulence) parameters combined, before any substitutions. These criteria are equaled for all quarterly/annual periods of the surface data selected for use, which covers the years 2016 through 2020.

**Selection of Surface Meteorological Data:** As noted above, the Project vicinity and immediate areas of Tualatin Valley are relatively flat, an important consideration in the selection of surface meteorological data for use in assessing the Project’s impacts on regional air quality. Under these circumstances (large expanses of relatively flat terrain), the nearest meteorological data meeting EPA siting and instrument criteria would be expected to be the most representative of the Project location. The ASOS data fulfill both criteria, being located in the immediate Project vicinity and meeting EPA siting and instrument criteria. Thus, the Hillsboro Airport ASOS data are proposed as the surface meteorological data for modeling Facility emissions. The close proximity of the ASOS station to the Project sites virtually assures that it could be considered representative, if not the equivalent of onsite data.

Both the ASOS and Ronler Acres/Aloha sites are located in the relatively flat Tualatin Valley at nearly identical distances and orientations from the relatively distant mountains which define the valley boundaries. There are no intervening terrain features between the ASOS location and project site to adversely affect the relative synoptic-scale wind patterns at either location (compared to each other). The current ASOS location from the NCDC Historical Observing Metadata Repository (HOMR) was verified and then refined to its exact location based on Google Earth photos (location is shown below).

**Selection of Upper Air Meteorological Data:** The most representative radiosonde observations nearest to the Project sites is the Salem Airport (McNary Field), located approximately 65 km south of the Project sites. Climatologically, Salem is similar to the Intel Project sites. Twice daily radiosonde data were available for the proposed modeled years of 2016 through 2020.

**Meteorological Data Surface Characteristics:** AERMET requires input summaries of the surface characteristics for the area surrounding the Hillsboro ASOS monitoring site. These surface characteristics were calculated with the EPA-program AERSURFACE program based on EPA guidance. AERSURFACE used the 2016 National Land Cover Data (NLCD) from the United States Geological Survey (USGS) to determine land use based on standardized land cover categories. AERSURFACE was executed in accordance with the EPA guidance documents “*AERMOD Implementation Guide*,” (March 19, 2009), and “*AERSURFACE User’s Guide*,” (EPA-454/B-20-008, revised February 2020). AERSURFACE determines the midday albedo, daytime Bowen ratio, and surface roughness length representative of the surface meteorological station. The **Bowen ratio** is based on a simple unweighted geometric mean while **albedo** is based on a simple unweighted arithmetic mean for the 10x10 km square area centered on the selected location (i.e., no



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direction or distance dependence for either parameter). **Surface roughness length** is based on an inverse distance-weighted geometric mean for upwind distances up to the EPA-recommended one (1) km radius from the selected location. The circular surface roughness length area (1-km radius) can be divided into any number of sectors as appropriate (EPA guidance recommends that no sector be less than 30° in width).

Twelve 30° sectors were processed to calculate the roughness lengths due to the homogeneity of the area within the EPA-recommended radius of one (1) km. Months were assigned to seasons as follows:

- Late autumn after frost and harvest, or winter with no snow: December, January, February
- Transitional spring (partial green coverage, short annuals): March-June
- Midsummer with lush vegetation: July-August
- Autumn with unharvested cropland: September-November

Temporal variations of monthly precipitation were considered in order to calculate the albedo for AERMET processing in accordance with EPA recommendations. Precipitation data should be measured at the nearest representative location to the surface data with the most complete precipitation record, particularly for the years of meteorology being modeled. Historical precipitation data are measured in the Hillsboro area (at Hillsboro Airport) and the monthly periods between 1991 to 2020 were used as input AERSURFACE and are presented in Table 3.

**Site Urban/Rural Classification:** Land use surrounding the Intel sites must be determined in order to assess if rural or urban dispersion characteristics should be used. Following Auer (1977) and as summarized in the EPA's "Guideline on Air Quality Models", if the land use within an area circumscribed by a three (3) km radius around each facility is industrial, commercial, or developed residential, then these areas are designated as urban. All other types of land use are considered rural.

The most objective approach is to use the 2016 land cover classification data (the same data set as used in AERSURFACE) and designate the "Developed Intensity" areas (IDs 22, 23 & 24) as urban based on Auer's classification. These classes are:

- Developed, Low Intensity (NLDC Code 22) – areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 20 to 49 percent of total cover. These areas most commonly include single-family housing units.
- Developed, Medium Intensity (NLCD Code 23) – This classification includes areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 50 to 79 percent of the total cover.
- Developed, High Intensity (NLCD Code 24) – This classification includes highly developed areas where people reside or work in high numbers. Examples include apartment complexes, row houses and commercial/industrial. Impervious surfaces account for 80 to 100 percent of the total cover.



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Table 3 Hillsboro Airport 30-year Precipitation Climatology Summary														
Year	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN	SMC
1991	3.01	3.84	3.67	4.88	2.34	1.7	0.25	0.65	0.39	1.66	5.66	4.76	32.81	
1992	4.65	3.7	1.17	4.06	0.13	0.36	0.77	0.31	1.21	2.47	4.54	6.44	29.81	
1993	4.27	0.87	3.77	5.03	3.52	2.68	1.49	0.16	0	1.08	1.26	7.54	31.67	
1994	4.42	5.06	2.85	1.18	1.15	0.94	0	0.42	0.6	6.48	6.32	6	35.42	
1995	8.63	3.47	5.37	3.96	1.35	1.8	0.98	0.39	1.57	2.91	8.32	7.82	46.57	
1996	7.56	10.23	2.93	4.63	4.34	0.97	0.58	0.13	2.96	4.22	9.21	14.83	62.59	
1997	7.67	2.03	6.33	2.18	2.01	2.07	0.73	1.59	3.15	5.45	5.91	3.34	42.46	
1998	8.36	6.64	4.07	1.3	4.77	1.41	0.32	0	0.87	6.4	9.03	7.07	50.24	
1999	7.48	9.78	4.29	1.5	1.74	1.55	0.66	0.84	0.14	2.49	6.91	3.91	41.29	
2000	6.92	4.35	3.02	1.36	1.91	1.04	0.08	0.75	1.27	3	2.16	3.24	29.1	
2001	1.94	1.58	2.33	1.86	0.85	1.2	0.45	0.79	0.79	3.13	8.54	6.98	30.44	
2002	7.31	3.13	3.49	1.71	1.44	1.3	0.32	0.05	0.83	0.43	2.61	9.88	32.5	
2003	8.29	2.93	5.16	5.91	0.75	0.15	0	0.55	0.94	3.07	4.43	7.93	40.11	
2004	5.9	4.27	1.68	1.79	1.24	0.82	0	2.31	1.37	3.55	2.61	3.72	29.26	
2005	2.27	0.68	4.42	2.56	4.35	1.55	0.24	0.32	1.36	3.68	6.09	9.09	36.61	
2006	11.9	1.99	3.57	2.02	2.7	1.08	0.14	0.08	0.59	0.9	12.88	7.49	45.34	
2007	3.24	3.8	2.39	1.96	1.29	0.97	0.4	0.53	1.73	3.12	3.9	8.94	32.27	
2008	5.38	1.49	3.31	1.94	0.97	0.36	0.09	1.37	0.22	1.69	4.51	7.57	28.9	
2009	4.36	1.08	2.4	1.24	2.92	1.34	0.13	0.72	1.51	3.32	5.72	3.96	28.7	
2010	5.14	4.06	3.76	3.22	3.16	3.52	0.45	0.17	2.21	3.98	5.23	8.16	43.06	
2011	3.59	3.83	5.39	3.42	4.68	0.59	1.23	0	0.26	1.88	5.38	2.33	32.58	
2012	5.79	2.48	6.59	2.38	2.34	2.42	0.09	0.02	0.04	5.45	7.59	7.5	42.69	
2013	1.47	1.87	1.81	2.33	3.98	1.31	0	0.85	6.27	0.87	2.73	1.08	24.57	
2014	2.41	5.06	6.07	3.42	1.7	0.92	0.52	0.14	1.1	6.12	2.83	5.88	36.17	
2015	3.01	4.57	4.68	1.41	0.44	0.54	0.32	0.55	0.86	3.42	4	14.6	38.4	
2016	<b>7.53</b>	<b>3.96</b>	<b>5.31</b>	<b>1.88</b>	<b>0.8</b>	<b>1.33</b>	<b>0.33</b>	<b>0.25</b>	<b>0.93</b>	<b>8.66</b>	<b>6.25</b>	<b>4.77</b>	<b>42.0</b>	<b>Wet</b>
2017	<b>4.11</b>	<b>10.06</b>	<b>6.96</b>	<b>3.56</b>	<b>1.82</b>	<b>1.05</b>	<b>0</b>	<b>0.13</b>	<b>1.39</b>	<b>4.04</b>	<b>7.38</b>	<b>2.92</b>	<b>43.42</b>	<b>Wet</b>
2018	<b>5.17</b>	<b>2.15</b>	<b>2.79</b>	<b>3.32</b>	<b>0.11</b>	<b>0.65</b>	<b>0</b>	<b>0</b>	<b>0.79</b>	<b>3.33</b>	<b>2.61</b>	<b>4.74</b>	<b>25.66</b>	<b>Dry</b>
2019	<b>3.12</b>	<b>4.96</b>	<b>1.36</b>	<b>3.23</b>	<b>1.45</b>	<b>0.64</b>	<b>0.49</b>	<b>0.21</b>	<b>3.08</b>	<b>1.51</b>	<b>1.16</b>	<b>5.22</b>	<b>26.43</b>	<b>Dry</b>
2020	<b>7.18</b>	<b>1.49</b>	<b>2.12</b>	<b>0.88</b>	<b>1.86</b>	<b>2.04</b>	<b>0.07</b>	<b>0.25</b>	<b>1.28</b>	<b>1.38</b>	<b>5.34</b>	<b>5.27</b>	<b>29.16</b>	<b>Dry</b>

Sorted Data – The 30-years of climatology were SORTED to determine DRY/AVG/WET months. Generally, the driest and wettest years were used to delineate DRY/WET (AVG was anything in-between). Years which had precipitation less than the 30<sup>th</sup> percentile were designated dry, years which had precipitation greater than the 70<sup>th</sup> percentile were designated wet and all other years were designated as average.

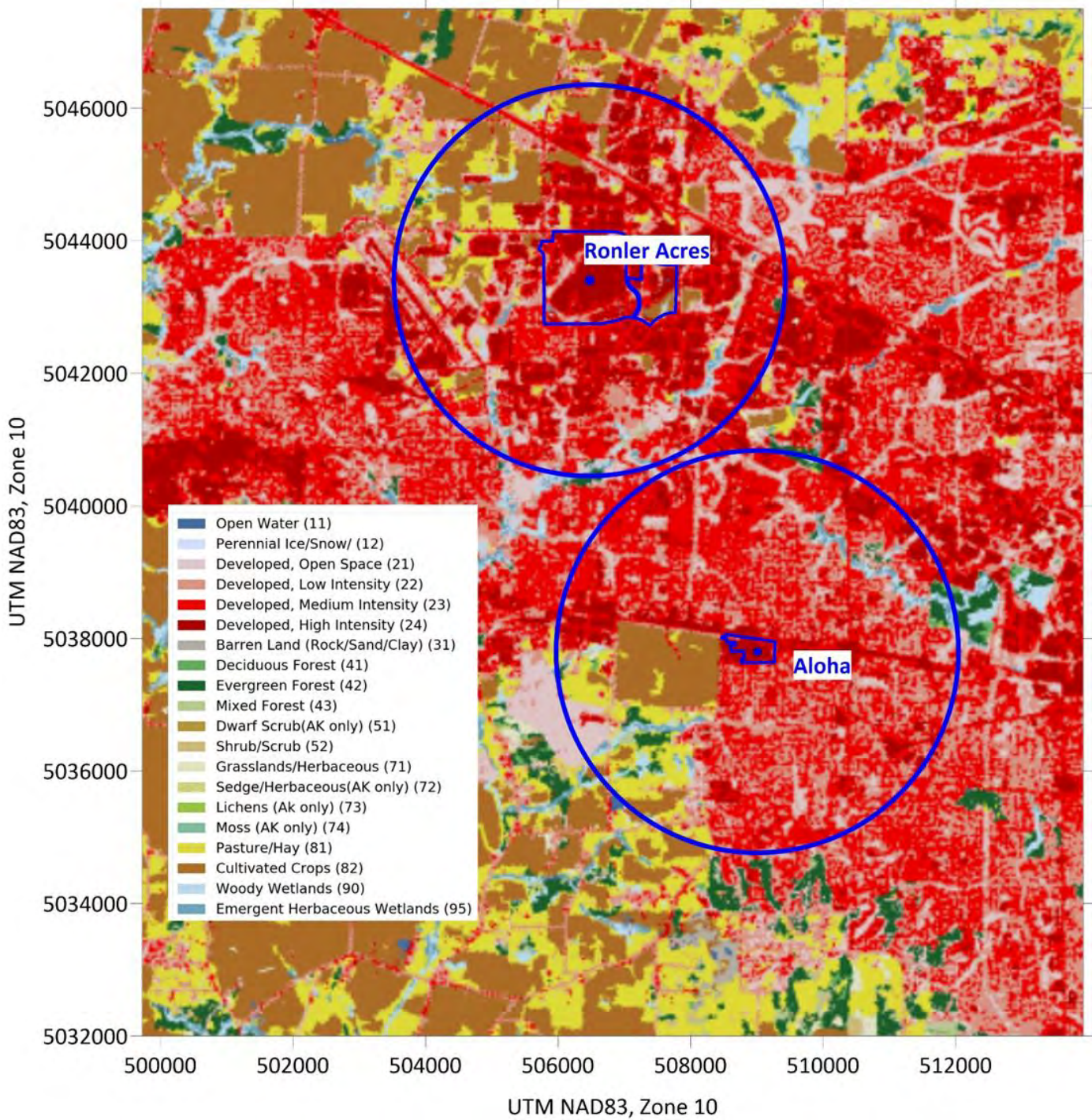
Table 4 and Figure 4 shows the land use determination for the Aloha and Gordon Moore Park at Ronler Acres sites. Both sites are over 70 percent urban. Because the area within 3 km is more than 50 percent classified as urban land use, the URBAN option was used for AERMOD in the modeling of the project.

In reviewing the AERMOD Implementation Guide (June 2022), it provides the following recommendations for assigning an urban population number in AERMOD:



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**Figure 4**  
**Land Use Surrounding the Intel Sites (3 km Radius in Blue)**



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*“For urban areas adjacent to or near other urban areas, or part of urban corridors, the user should attempt to identify that part of the urban area that will contribute to the urban heat island plume affecting the source(s). If this approach results in the identification of clearly defined MSAs, then census data may be used as above to determine the appropriate population for input to AERMOD. Use of population based on the Consolidated MSA (CMSA) for applications within urban corridors is not recommended, since this may tend to overstate the urban heat island effect. Similarly, for application sites that are in isolated areas of dense population but are not representative of the larger MSA, care should be taken to determine the extent of the area the urban area that will contribute to the urban heat island plume affecting the source(s).*

*For situations where MSAs cannot be clearly identified, the user may determine the extent of the area, including the source(s) of interest, where the population density exceeds 750 people per square kilometer. The combined population within this identified area may then be used for input to the AERMOD model.”*

Table 4 Land Use Summaries						
ID	Description	Class	Ronler	Percent	Aloha	Percent
11	Open Water:	Rural	16	0.1%	3	0.0%
21	Developed, Open Space:	Rural	2892	9.2%	1895	6.0%
22	Developed, Low Intensity:	Urban	6287	20.0%	8781	27.9%
23	Developed, Medium Intensity:	Urban	9523	30.3%	12530	39.9%
24	Developed, High Intensity:	Urban	6855	21.8%	2673	8.5%
31	Barren Land (Rock/Sand/Clay):	Rural	21	0.1%	0	0.0%
41	Deciduous Forest:	Rural	0	0.0%	73	0.2%
42	Evergreen Forest:	Rural	86	0.3%	500	1.6%
43	Mixed Forest:	Rural	35	0.1%	56	0.2%
52	Shrub/Scrub:	Rural	14	0.0%	4	0.0%
71	Grasslands/Herbaceous:	Rural	105	0.3%	95	0.3%
81	Pasture/Hay:	Rural	1825	5.8%	1801	5.7%
82	Cultivated Crops:	Rural	3203	10.2%	2207	7.0%
90	Woody Wetlands:	Rural	339	1.1%	518	1.6%
95	Emergent Herbaceous Wetland:	Rural	222	0.7%	282	0.9%
	Total:		31423		31418	
	<b>Percent Urban</b>			<b>72%</b>		<b>76%</b>
	<b>Percent Rural</b>			<b>28%</b>		<b>24%</b>

Dispersion within urban environments has different characteristics than that occurring in a rural environment. The urban boundary layer will behave in a more convective, turbulent manner during the hours just after sunset due to the urban heat island effect. Using the Aloha Project site as general center point, Figure 5 presents the Project locations relative to the city boundaries in the region. The Aloha site is approximately 10 kilometers from the northwestern edge of the Hillsboro city boundary and nine (9) kilometers from the southeastern edge of the Beaverton city boundary. The three (3) cities used for identifying the population are Hillsboro, Aloha and Beaverton. Each of the three (3) cities vastly exceeds the 750 people per square kilometer EPA threshold for identifying the area as urban. The three (3) cities also represent a continuous urban/developed corridor which is aligned with the predominant wind





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direction. The use of the 2022 census derived population data and population density data are summarized in Table 5.

Table 5 Existing Populations and population density		
	Population*	Population Density/km <sup>2</sup> *
Hillsboro	107,299	1,601.3
Aloha	58,828	2,825.3
Beaverton	97,053	1,920.2
Total	263,180	
* 2020 /2022 United States Census Bureau Data		

Based on the combined population of 263,180, this value was used for the population input into AERMOD. This combined population presents a conservative and appropriate magnitude of the urban heat island effects within the impact areas surrounding both sites.

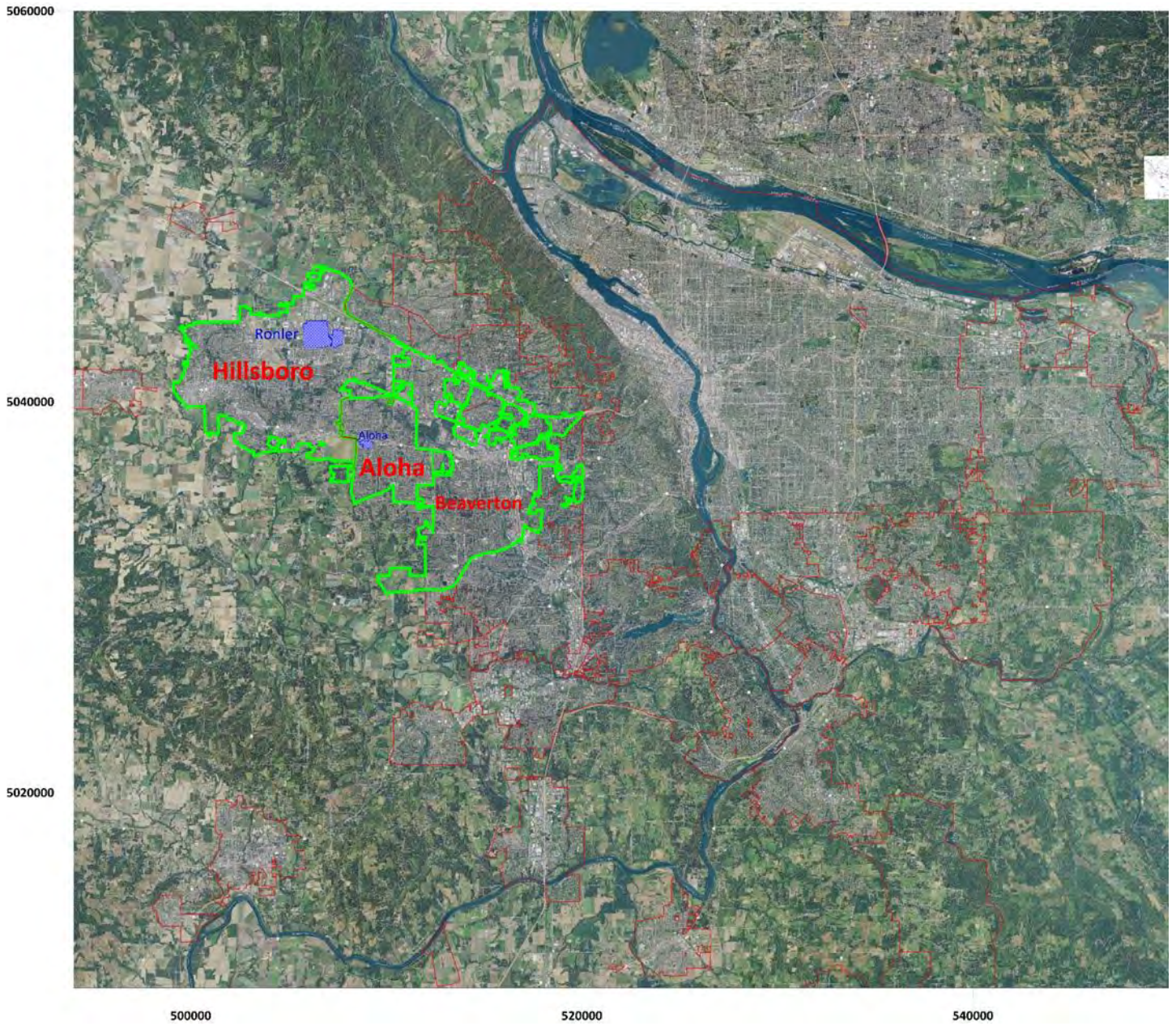
**Meteorological Data Representativeness:** The ODEQ approved use of the five (5) years of Hillsboro Airport ASOS surface meteorological data satisfies the need for site-representative data. EPA defines the term “site-representative data” to mean data that would be similar to atmospheric dispersion conditions at the source and at locations where the source may have a significant impact on air quality. Specifically, the meteorological data requirement originates from the Clean Air Act in Section 165(e)(1), which requires an analysis “of the ambient air quality at the facility and in areas which may be affected by emissions from such facility for each pollutant subject to regulation under [the Act] which will be emitted from such facility.” This requirement and EPA’s guidance on the use of site-representative data are also discussed in Section 8.4.4 of Appendix W to 40 CFR Part 51. The representativeness of meteorological data is dependent upon a determination that the data are free from inappropriate local or microscale influences.: (a) the proximity of the meteorological monitoring site to the area under consideration; (b) the complexity of the topography of the area; (c) the exposure of the meteorological sensors; and (d) the period of time during which the data are collected.

The Hillsboro Airport ASOS surface meteorological monitoring station qualifies as site-representative data for several reasons. First, the Hillsboro Airport meteorological monitoring site is the closest ASOS site and located in very close proximity to the Intel locations, with nearly identical elevations above mean sea level (amsl). Second, both locations are located in the same area of the broad and relatively flat Tualatin Valley. Third, the ASOS monitoring location at the airport was selected to be far enough from wind flow perturbations caused by buildings and other features. Fourth, the period of meteorological data selected at the time of the modeling analyses (2016-2020) would be expected to be the most representative of current conditions, with the same general land uses surrounding the current ASOS location and airport as well as the proposed Project sites. A review of current Google Earth photo-aerials shows that nearby land uses at both locations are similar to the land uses reflected in the 2016 and 2020 NLCD sets. Additionally, these data meet the EPA data recovery requirements for air quality modeling as described earlier.



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Figure 5  
City Boundaries Used for Developing Urban Population in AERMOD



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Representativeness is defined in the document “*Workshop on the Representativeness of Meteorological Observations*” (Nappo et. Al., 1982) as “the extent to which a set of measurements taken in a space-time domain reflects the actual conditions in the same or different space-time domain taken on a scale appropriate for a specific application.” Judgments of representativeness should be made only when sites are climatologically similar, as is the case with the meteorological monitoring site and the proposed Project location. In determining the representativeness of the meteorological data set for use in the dispersion models at the Project sites, the consideration of the correlation of terrain features to prevailing meteorological conditions, as discussed earlier, would be nearly identical to both locations since the orientation and aspect of terrain at the proposed Project locations correlates well with the prevailing wind fields as measured by and contained in the meteorological dataset. In other words, the same mesoscale and localized geographic and topographic features that influence wind flow patterns at the meteorological monitoring site also influence the wind flow patterns at the proposed Project sites.

For these reasons, the Hillsboro Airport meteorological data was selected and approved by ODEQ for use in modeling emissions from the proposed Project. This data also satisfied the EPA definition of representative data which is similar to the meteorological and dispersion conditions at the Project sites and the regional area. An annual windrose for the five-year modeling period is shown in Figure 6.

**Existing Baseline Air Quality Data:** The nearest air quality monitoring sites to the proposed Project are listed in Table 6 which also lists the monitored pollutants and distances to the Project.

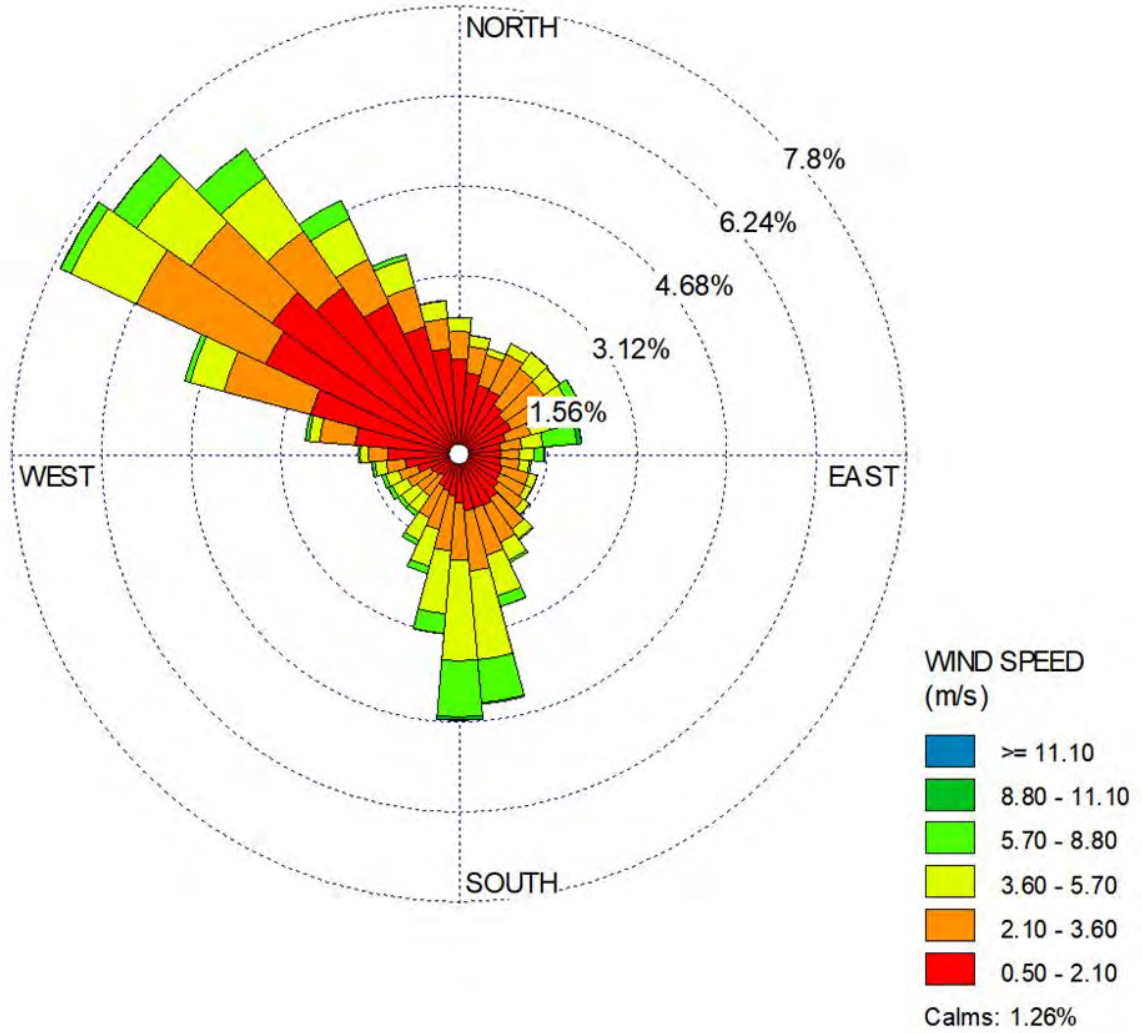
Table 6 Ambient Monitoring Site Information				
Monitors	Distance from Ronler Acres (km)	Distance from Aloha (km)	Pollutants Monitored	Monitoring Objective
SE Lafayette (SEL) 5824 SE Lafayette St. (EPA# 41-051-0080)	25	22	CO, NO <sub>2</sub> , Ozone, PM-10, PM-2.5, SO <sub>2</sub>	Population/NAAQS
Tualatin at I-5 (TBC) (EPA# 41-067-0005)	21	15	CO, NO <sub>2</sub> , Ozone, PM-2.5	Source/NAAQS
Hare Field (HHF) Grant Street (EPA# 41-067-0004)	5	8	PM-2.5	Population/NAAQS

In addition to the monitoring site data, the ODEQ allows for the use of the *Northwest International Air Quality Environmental Science and Technology Consortium (NW-AIRQUEST)* data for the 2014-2017 period which is considered design data for the 2023 period and can be considered representative of the impact areas. These data sets are summarized in Table 7.



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Figure 6  
Hillsboro Annual Wind Rose (2016-2020)



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Table 7 Background Monitoring Data									
Pollutant	Units	Avg Time	Stations	2018	2019	2020	2021	2022	NW AIRQUEST Design Value
PM-2.5	ug/m <sup>3</sup>	24 Hr 1 <sup>st</sup> High	Hare Field	28	36	28	24	47	NA
			Tualatin	19	32	28	20	66	
			S. Lafayette	20	30	31	23	75	
		24 Hr 98 <sup>th</sup> percentile	Hare Field	18	24	18	15	29	19.6
			Tualatin	17	21	18	18	28	
			S. Lafayette	17	20	23	16	27	
		Annual Mean	Hare Field	6.1	6.7	6.1	5.8	7.9	6.3
			Tualatin	7.1	6.8	6.8	6.7	8.5	
			S. Lafayette	6.8	6.5	7.1	6.4	7.9	
PM-10	ug/m <sup>3</sup>	24 Hr 1 <sup>st</sup> High	S. Lafayette	54	33	35	31	83	55
			S. Lafayette	27	29	35	29	39	
		24 Hr 1 <sup>st</sup> High	Hare Field	ND	35	ND	ND	ND	
			Hare Field	ND	32	ND	ND	ND	
		CO	ug/m <sup>3</sup>	8 Hr 1 <sup>st</sup> High	Tualatin	1145	1145	1145	
S. Lafayette	1832				1832	1718	1947	1947	
1 Hr 1 <sup>st</sup> High	Tualatin			1603	1489	**	1603	2061	1744
	S. Lafayette			2405	2176	**	2978	2405	
NO <sub>2</sub>	ug/m <sup>3</sup>			1 Hr 1 <sup>st</sup> High	Tualatin	83	77	79	71
		S. Lafayette	88		81	66	68	68	
		1 Hr 98 <sup>th</sup> percentile	Tualatin	72	62	56	56	58	65.7
			S. Lafayette	66	60	55	58	56	
		Annual Mean	Tualatin	23	21	19	17	19	14.2
S. Lafayette	17	15	12	12	13				
SO <sub>2</sub>	ug/m <sup>3</sup>	1 Hr 1 <sup>st</sup> High	S. Lafayette	9	8	8	8	8	NA
			S. Lafayette	3	3	4	5	5	
		1 Hr 99 <sup>th</sup> percentile	S. Lafayette	8	8	5	8	8	12.6
			S. Lafayette	1.2	0.6	0.6	1.3	1.5	
		Annual Mean	S. Lafayette	1.2	0.6	0.6	1.3	1.5	1.20

Notes: Data for 2021-2022 was derived from EPA AIRS Monitored Values Reports. NA = not applicable ND = no data  
 ODEQ data for 2018-2020 was also supplemented by EPA AIRS data as necessary.  
 \*\* ODEQ fire data not removed by EPA.

Federal regulations, specifically 40 CFR Part 58 Appendix D, require that a State and Local Air Monitoring (SLAMS) network be designed to meet a minimum of three basic monitoring objectives: Provide air pollution data to the public in a timely manner, support compliance with the National Ambient Air Quality Standards (NAAQS), and support air pollution research. A variety of site types are needed to support these basic objectives, including six (6) general types listed below:

1. Sites are located to determine the highest concentrations expected to occur in the area covered by the network.



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2. Sites are located to measure typical concentrations in areas of high population density.
3. Sites are located to determine the impact of significant sources or source categories on air quality.
4. Sites are located to determine general background concentration levels.
5. Sites are located to determine the extent of regional pollutant transport among populated areas.
6. Sites are located to measure air pollution impacts on visibility, vegetation damage, or other welfare-based impacts.

The physical siting of an air monitoring station must conform to 40 CFR Part 58 and its location must achieve a spatial scale of representativeness that is consistent with the monitoring objective and site type.

The spatial scale results from the physical location of the site with respect to the pollutant sources and categories. It estimates the size of the area surrounding the monitoring site that experiences uniform pollutant concentrations. The categories of spatial scale are:

1. Microscale-Defines the concentrations in air volumes associated with area dimensions ranging from several meters up to about 100 meters.
2. Middle scale-Defines the concentration typical of areas up to several city blocks in size with dimensions ranging from about 100 meters to 0.5 kilometer.
3. Neighborhood scale—Defines concentrations within some extended area of the city that has relatively uniform land use with dimensions in the 0.5 to 4.0 kilometers range.
4. Urban scale-Defines concentrations within an area of city-like dimensions, on the order of 4 to 50 kilometers.
5. Regional scale-Defines usually a rural area of reasonably homogeneous geography without large sources and extends from tens to hundreds of kilometers.
6. National and global scales-These measurement scales represent concentrations characterizing the nation and the globe as a whole.

The selection of these monitoring sites is also based on the monitoring stations' objective, which is NAAQS and population exposure for measuring background air quality. These monitoring objectives can be used to support the demonstration of compliance with the NAAQS when coupled with dispersion modeling.

Along with the monitoring objective is the spatial scale of the monitoring site which is used to represent high concentration locations, population and background exposure. The spatial scale of the SE Lafayette monitoring station is summarized below by pollutant:

- NO<sub>2</sub> – Urban which represents highest concentration, population exposure and general background.
- Ozone – Urban which represents highest concentration, population exposure and general background.
- CO – Micro scale which represents highest concentration.
- SO<sub>2</sub> – Urban which represents highest concentration, population exposure and general background.
- PM-10 – Neighborhood which represents highest concentration, population exposure and general background.



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- PM-2.5 – Neighborhood which represents highest concentration, population exposure and general background.

The spatial scale for Hare Field is:

- PM-2.5 – Neighborhood scale which is used for highest concentration, population exposure and general background.

The spatial scale for the Tualatin monitoring station is microscale whose primary purpose is to monitor freeway-based concentration data for NO<sub>2</sub>, CO, Ozone, and PM-2.5. While microscale is useful for determining highest concentration data, the immediate proximity to Interstate Route 5 (I-5) make this monitoring data better suited to identifying temporal (freeway-based impacts) to air quality based on time of day rather than measuring a true background data set that is not influenced by any one source or source type. As such, the further use of this data set was not considered.

As referenced above, there is also gridded background air quality data based on the NW AIRQUEST data set that covers the Project area. This data set (2014-2017) can also be used as representative background if demonstrated to be appropriate and applicable to a particular Project area. And while the use of the NW AIRQUEST data can be considered conservative for some pollutants and averaging periods, as noted below, this data set does not track the current background air quality trends over the last five (5) years as discussed below.

Based on the goals and objectives of the specific monitors listed in Table 6, the selection of the SE Lafayette and Hare Field monitoring sites were chosen to represent background for use in the dispersion modeling analyses.

In order to select the applicable background monitored data set to use in the modeling analyses, a trend analysis of the background air quality data based on the last five (5) years is summarized below which is based, in part, on the data in Table 7. Background trends for CO and SO<sub>2</sub> are not summarized below as the Project impacts are expected to be less than the applicable significant impact levels (SILs). Additionally, the SE Lafayette monitoring station represents the highest (design value) concentration for CO and the NW AIRQUEST represents the highest design value for SO<sub>2</sub>. These locations were used to represent background concentrations as needed for the Project modeling analyses.

The overall trend in background NO<sub>2</sub> for the last five (5) years (2018-2022) at the SE Lafayette monitoring station has been downward for both 1 hour (98<sup>th</sup> percentile) and annual averages. A similar trend is noted at the Tualatin monitoring site. Note the NW AIRQUEST data is consistent with the 2018 monitoring data and does not reflect the decrease in background over time.

This trend for PM-2.5 is not duplicated as the background concentrations at SE Lafayette, Tualatin and Hare Field have shown a small increase in background monitored concentrations since 2018. While the PM-2.5 trend decreased during the 2021 time period, overall, the trend has been upward. As noted with the NO<sub>2</sub> trends, the NW AIRQUEST data best represents the year 2018 and does not reflect the increase in background over time.

PM-10 trends at the SE Lafayette site show similar increases between the years 2018 and 2022.



## Seasonal Background NO<sub>2</sub> Data

For 1-hour NO<sub>2</sub>, seasonal hourly background for the 2019-2021 data period was used, in accordance with the procedures found in “Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the PSD Program” (6/29/10) and “Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> NAAQS” (3/01/11). Complete hourly data from the 2022 data period is not yet available for use so the seasonal hourly background NO<sub>2</sub> for modeling will be the 2019-2021 data period. In accordance with EPA procedures, the third highest value for each hour and season was used to calculate the three-year average of each time period.

Seasonal Hour-Of-Day is determined by organizing all of the NO<sub>2</sub> concentrations by hour of day (1AM, 2AM, 3AM, etc.) for each season of the year in descending order and selecting the 3<sup>rd</sup> highest NO<sub>2</sub> concentrations for each hour of the day and season.

For example, (1AM)

1. First take all the 1AM values (maximum of 90-92 numbers) for each Season
  - a. Winter = December of Previous Year, January, February
  - b. Spring = March, April, May
  - c. Summer = June, July, August
  - d. Autumn = September, October, November
2. Sorting the NO<sub>2</sub> concentrations in descending order (highest to lowest)
3. Take the 3<sup>rd</sup> highest NO<sub>2</sub> concentrations.
4. This value was used to represent the 1AM 3<sup>rd</sup> highest or 98<sup>th</sup>- percentile of available data.
5. The above process is repeated for each hour of the day and season.
6. Repeat steps 1 through 5 for each of the three years under review.
7. Average the three 1AM NO<sub>2</sub> concentrations.
8. This value was used in AERMOD as the NO<sub>2</sub> background concentrations (3yr average of the 98<sup>th</sup> percentile) for the 1AM hour and season.
9. Repeat step 7 and 8 for each of the hours in the day and season.

This produced the following data in Table 8 which was used as input in the AERMOD analysis for the 1-hour NO<sub>2</sub> NAAQS.

<b>Table 8</b>					
<b>Ambient NO<sub>2</sub> Seasonal Hour by Day Concentrations</b>					
<b>Hour</b>	<b>Winter</b>	<b>Spring</b>	<b>Summer</b>	<b>Fall</b>	<b>Units</b>
<b>1</b>	21.40	23.50	14.70	19.10	PPB
<b>2</b>	20.50	22.70	13.50	18.40	PPB
<b>3</b>	19.60	22.20	15.20	17.90	PPB
<b>4</b>	20.30	21.70	15.50	17.10	PPB
<b>5</b>	20.00	23.10	17.90	17.30	PPB
<b>6</b>	21.40	22.70	17.90	19.20	PPB
<b>7</b>	23.60	26.50	19.90	21.00	PPB





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8	27.50	25.90	17.20	21.30	PPB
9	23.90	22.50	15.50	20.30	PPB
10	22.70	18.90	12.00	17.00	PPB
11	21.60	16.40	13.50	16.70	PPB
12	20.40	14.30	11.10	16.80	PPB
13	18.50	15.00	11.20	18.00	PPB
14	18.10	14.60	12.50	17.80	PPB
15	18.80	13.50	9.20	18.40	PPB
16	19.10	13.60	8.00	20.10	PPB
17	22.30	13.70	10.30	21.10	PPB
18	24.80	15.40	8.40	26.50	PPB
19	28.20	18.30	10.20	30.10	PPB
20	30.00	26.60	14.10	29.80	PPB
21	28.80	30.10	15.50	27.10	PPB
22	28.30	27.90	17.80	25.10	PPB
23	26.90	26.50	16.80	23.70	PPB
24	24.10	24.50	15.10	20.80	PPB

**Summary of Selected Data:** Based on the monitoring objectives (NAAQS), the spatial scales (Urban and Neighborhood) of the Hare Field and SE Lafayette monitoring stations and the last five (5) years of background trends, these sites were selected as being the most representative for determining the background concentrations to be used in the modeling analyses in place of the NW AIRQUEST design values. For NO<sub>2</sub>, Ozone and PM-10 background data, SE Lafayette was used with PM-2.5 background based on Hare Field, which is also the closest PM-2.5 monitoring station to the Project sites. For background CO and SO<sub>2</sub>, the SE Lafayette data was also used in the modeling analyses.

The background concentrations used in the modeling analyses are the highest values over the last three (3) year period for 1-and 8-hour CO, 24-hour PM-10, annual NO<sub>2</sub> and 1-hour, 24-hour and annual SO<sub>2</sub>. 24-hour and annual PM-2.5 background concentrations are based on the 3-year average in accordance with “Guidance for Ozone and Fine Particulate Matter Permit Modeling” (07/29/22). Table 9 presents the background concentration data used in the dispersion modeling assessments.

Table 9 Background Air Quality Data Summary	
Pollutant and Averaging Time	Background Value (µg/m <sup>3</sup> )
PM-10 – 24-hour 3-year 2 <sup>nd</sup> High NAAQS	39.0
PM-2.5 <sub>s</sub> – 3-Year Average of Annual 24-hour 98 <sup>th</sup> Percentiles NAAQS	20.7
PM-2.5 <sub>s</sub> – 3-Year Average of Annual Values NAAQS	6.6
CO – 1-hour High NAAQS	2,978



## AIR QUALITY IMPACT ASSESSMENT

CO – 8-hour High NAAQS	1,947
NO <sub>2</sub> –3-Year Average of Annual 98 <sup>th</sup> Percentile 1-hour Daily Maximum NAAQS	56.3*
NO <sub>2</sub> – Annual Maximum NAAQS	18.3
SO <sub>2</sub> – 3-Year Average of Annual 99 <sup>th</sup> Percentile 1-hour Daily Maxima NAAQS	7.0
SO <sub>2</sub> – 24-hour Maximum NAAQS 24-hour High, 2 <sup>nd</sup> High NAAQS	4.7
SO <sub>2</sub> – Annual Maximum NAAQS	1.1
<p>Notes * Seasonal hourly background concurrent with the 2016-2020 meteorology was used for modeling. Reference value only. Conversion of ppm/ppb measurements to µg/m<sup>3</sup> concentrations based on: µg/m<sup>3</sup> = ppm x 40.9 x MW, where MW = 48, 28, 46, and 64 for ozone, CO, NO<sub>2</sub>, and SO<sub>2</sub>, respectively.</p>	

### AIR QUALITY MODELING PROCEDURES

The AERMOD dispersion model was used to quantify pollutant impacts on the surrounding environment based on the emission sources and operating parameters. AERMOD was used to determine Facility impacts on Class II areas in the immediate Project vicinity in simple, intermediate, and complex terrain areas during Project operations. AERMOD was also used to assess the Class I significant impact levels (SILs) as discussed later in the summary report. AERMOD was the primary model used for comparison of Project impacts to SILs and demonstration of compliance with NAAQS. Modeling of operational impacts are described below.

**AERMOD Model, Options, and Procedures:** AERMOD is a steady-state plume dispersion model that simulates transport and dispersion from multiple point, area, or volume sources based on updated characterizations of the atmospheric boundary layer. AERMOD uses Gaussian distributions in the vertical and horizontal for stable conditions, and in the horizontal for convective conditions; the vertical distribution for convective conditions is based on a bi-Gaussian probability density function of the vertical velocity. For elevated terrain AERMOD incorporates the concept of the critical dividing streamline height, in which flow below this height remains horizontal, and flow above this height tends to rise up and over terrain. AERMOD also uses the advanced PRIME algorithm to account for building wake effects. AERMOD input data options are listed below following these EPA modeling guidance documents.

- Final plume rise
- Stack tip downwash
- Regulatory default option (i.e., calm and missing meteorological data processing and elevated terrain heights option)

Flagpole receptors were not used (ground level concentrations only). AERMAP was used to calculate receptor elevations and hill height scales for all receptors from National Elevation Data (NED) data in accordance with EPA guidance. Selection of the receptor grids is discussed below.



## AIR QUALITY IMPACT ASSESSMENT

**GEP Stack Height and Downwash:** Stack locations and heights and building locations and dimensions were input to BPIP-PRIME. The first part of BPIP-PRIME determines and reports on whether a stack is being subjected to wake effects from a structure or structures. The second part calculates direction-dependent “equivalent building dimensions” if a stack is being influenced by structure wake effects. The BPIP-PRIME output is formatted for use in AERMOD input files. BPIP-PRIME included all of the point source locations. Figures 7 and 8 present the buildings and building names that were input in to BPIP-PRIME. The individual building elevations can be found in the BPIP-PRIME input/output files.

**Receptor Selection:** Receptor and source base elevations were determined from United States Geological Survey (USGS) National Elevation Dataset (NED) data. The NED data was processed with the EPA-model AERMAP for the receptor locations selected. All coordinates (both sources and receptors) are referenced to UTM North American Datum 1983 (NAD83, Zone 10). AERMAP is capable of interpolating the elevation data in the NED data for both receptor elevations and hill height scales.

The NED data are available in 1/3-arcsecond (about 10 meter) and 1-arcsecond (about 30 meter) grid node spacing. Areas that contain receptor grids with 100 meter spacing or less between adjacent receptors used the 10 meter NED data. Other areas that contain only receptor grids of greater than 100 meter spacing utilized the 30 meter NED data. For purposes of determining hill height scales, the NED datasets used were extended 5-km past the outside of the coarse receptor grid described below for 30-meter NED data and 2-km past the outside of the intermediate/downwash receptor grids described below for 10-meter NED data.

Cartesian coordinate receptor grids were used to provide adequate spatial coverage surrounding the Project area for assessing ground-level pollution concentrations, to identify the extent of significant impacts, and to identify maximum impact locations. For the full impact analyses, a nested grid was developed to fully represent the initial location and extent of significance area(s) and maximum impact area(s). The nested grid was comprised of the following:

- Receptors were placed along the proposed Project fencelines with a spacing of about 25 meters or less between adjacent receptors.
- The downwash receptor grid with a receptor spacing of 25 meters was extended from the Project fencelines out to 300 meters from the Project.
- The first intermediate receptor grid with 50-meter receptor spacing was extended from the downwash receptor grid out to 1000 meters from the Project fencelines.
- The second intermediate receptor grid with 100-meter receptor spacing was extended from the first intermediate receptor grid outwards to two (2) kilometers (km) from the Project fencelines in all directions.
- The first coarse grid with 200-meter receptor spacing extended out five (5) km from the Project in all directions.
- A second coarse grid with 500 meters spacing extended outwards ten (10) km from the Project fencelines in all directions.
- Additional grids with 1,000 meters spacing were developed to close off the 1-hour NO<sub>2</sub> SIL isopleth of 7.5  $\mu\text{g}/\text{m}^3$ .
- When maximum impacts occur in areas outside the 25-meter spaced receptor grid, additional refined receptor grids with 25-meter resolution were placed around the maximum impacts and extended as necessary to determine maximum impacts.



Figure 7  
Gordon Moore Park at Ronler Acres Building Names for BPIP-PRIME

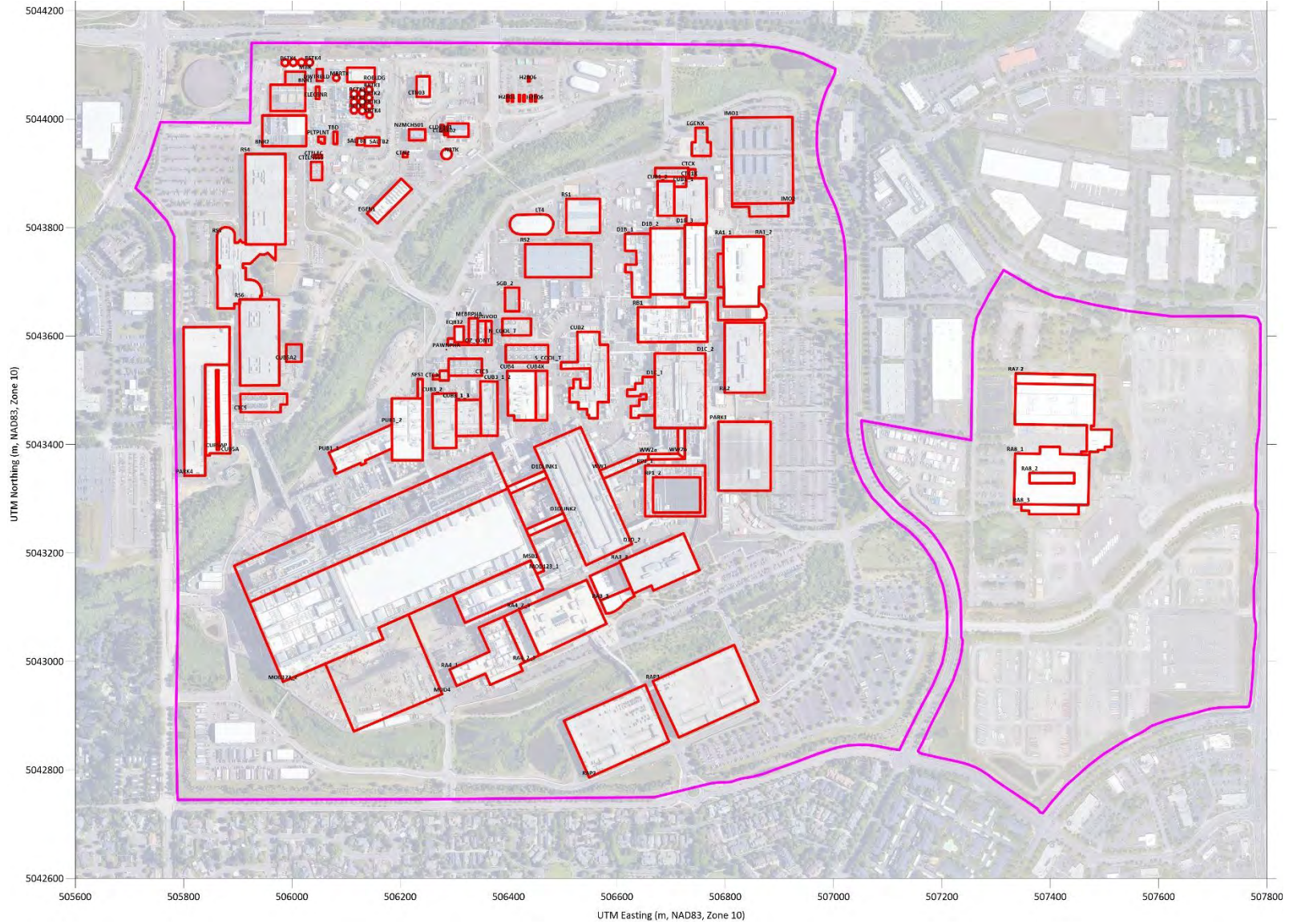


Figure 8  
Aloha Building Names for BPIP-PRIME



# AIR QUALITY IMPACT ASSESSMENT

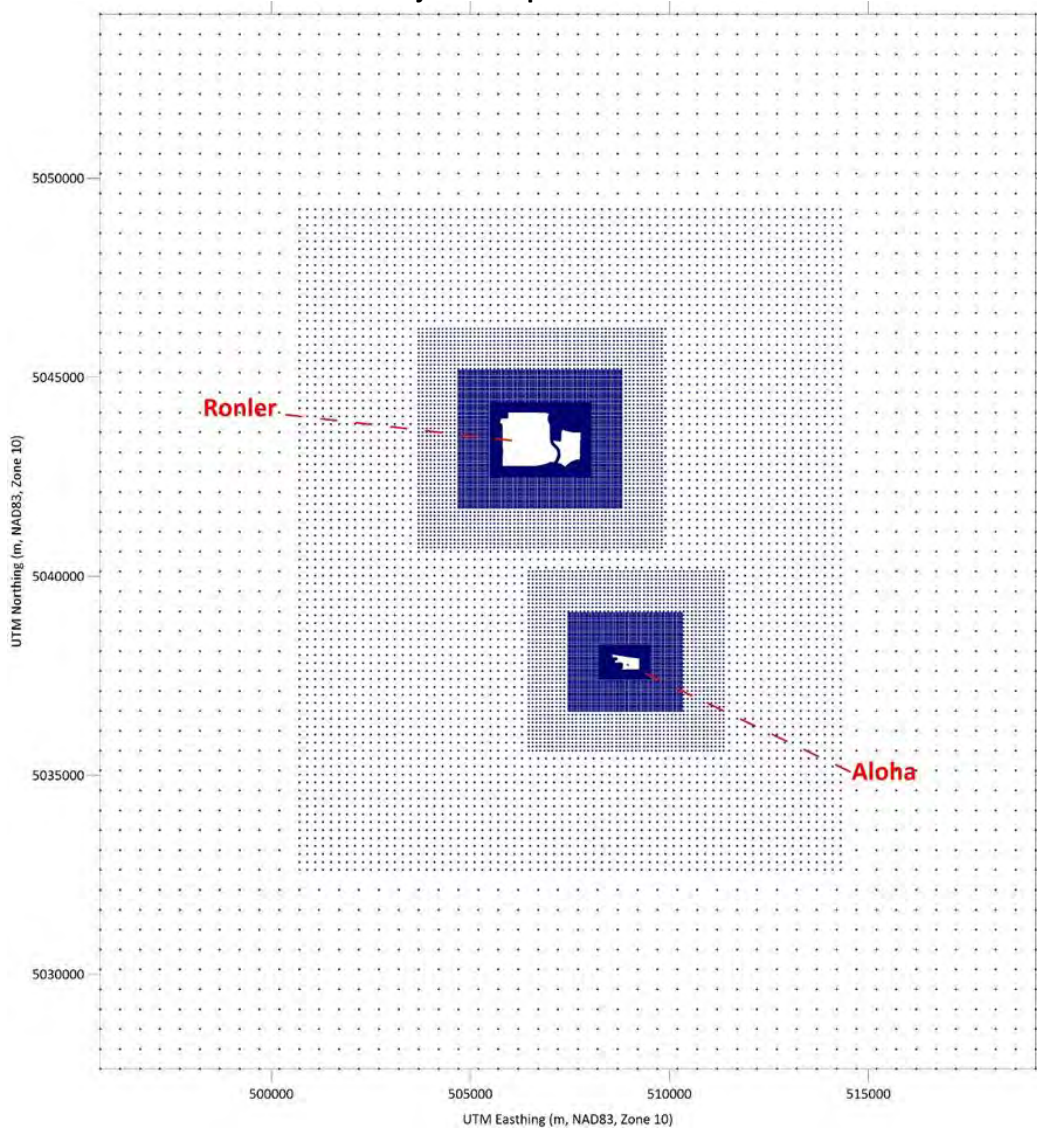
Ambient concentrations within the Facility fencelines were not calculated.

Figure 9 depicts the receptor grids based on the discussion above.

## Steady-State Emission Sources

Modeled concentrations from normal operations were based on continuous operation of all sources at the Project, except for the emergency diesel generators and fire pumps. For the continuous source operations, with Scrubbers, RCTOs, Boilers, Heaters, Generators, Cooling Towers and the ammonia waste TMWX, each short-term averaging period (1-,8- and 24-hour) utilized the maximum hourly emission rates. Annual emissions were based on full time operation or utilized annual capacity factors.

**Figure 9**  
**Project Receptor Grids**



## AIR QUALITY IMPACT ASSESSMENT

In summary:

- EXSC, EXAM, PSSS, RCTO and TMXW operate 24 hours per day and 8,760 hours per year.
- RCTOs at an annual operating capacity at 100%
- Boiler operation is up to 24 hours per day with a 30% annual capacity factor.
- Emergency generator testing occurs up to 60 minutes per day, 10 engine tests per day and 25 hours per year. Fire pump testing is up to 50 hours per year. The modeling procedures for the emergency generators are discussed below.
- Cooling towers operate 24-hours per day and 8,760 hours per year.
- Lime silos will only emit during loading operations which will occur no more than 1 hour per day with only one silo being loaded on any given hour or day. On an annual basis, there will be no more than 52 loading operations per year per silo.
- Fugitive dust emissions are assumed to occur 24 hours per day and 8,760 hours per year.

All the sources were modeled as point sources with the fugitive emissions modeled as an area source and the lime silo as a volume source. All the source coordinates are based on UTM NAD 83, Zone 10. Table 10 presents the emission source naming scheme used in AERMOD along with the modeled pollutants which were assessed in this report. This naming scheme is used in the detailed source/emissions tables provided in Attachment B as well as in the modeling input/output files that are provided to the ODEQ.

Table 10 Emission Source Names and Types		
Emission Source	Model ID	PSD Pollutants Subject to AQ Assessment
Rotary Concentrator Thermal Oxidizers (RCTOs)	TO	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
RCTO with Wet Electrostatic Precipitator (WESP)	TI, TW	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Scrubbers:		
Acid Gas (EXSC) Scrubbers	SC	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
EXSC with WESP	SI, SW	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Ammonia (EXAM) Scrubbers	AM	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Process Specific Support System (PSSS) Scrubbers	PS, SC	PM-10, PM-2.5
Boilers	BO	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Building Heaters and Small Boilers	HE	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Emergency Generators and Fire Pumps	EG, FI	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Trimix Ammonia Treatment System (TMXW)	TM	NO <sub>x</sub> , CO, PM-10, PM-2.5, SO <sub>2</sub> , VOC
Lime Silos	LIME	PM-10, PM-2.5
Cooling Towers	CT	PM-10, PM-2.5
Paved Road	PR	PM-10, PM-2.5

### Intermittent Emission Sources

The fire pumps and emergency generators operate intermittently, for a limited number of hours in the year for maintenance and readiness testing. Intel's current air permit specifies that no more than ten (10) generators may be run in a day and the generators can only be run during daylight hours, which is defined as hours between 8:00 am and 6:00 pm. To evaluate compliance with short-term and long-term air quality standards, these sources were modeled using annualized emissions (hourly emission rate times the number of hours run per year divided by 3,650) for all hours of the day.

The emergency generators typically run up to 25 hours per year, with 50 hours for the emergency fire pumps. As explained in EPA's March 1, 2011, memorandum, "Additional Clarification Regarding



## AIR QUALITY IMPACT ASSESSMENT

*Application of Appendix W Modeling Guidance for the 1-hour National Ambient Air Quality Standard*<sup>2</sup> it is unlikely that emissions from the intermittently operated emergency generators will coincide with the worst-case meteorological conditions and modeled 1-hr NO<sub>2</sub> impacts can be significantly overestimated. As such, EPA also suggests in their March 1, 2011, memo that these types of intermittent sources can be excluded from compliance demonstrations for the 1-hour NO<sub>2</sub> standard. Nonetheless, Intel included emergency generator emissions in the 1-hour NO<sub>2</sub> standard compliance demonstration using the EPA modeling procedures (annualized emissions for NO<sub>2</sub>) and the Monte Carlo methodology described below.

Since the generators only run intermittently, they pose a challenge to accurately reflect potential ambient air quality impacts. One approach recommended by EPA<sup>3</sup> is to model impacts from intermittent sources based on an annualized hourly emission rate, rather than the maximum hourly emissions. This approach would account for potential worst-case meteorological conditions combined with continuous operation of the emergency generators at an average hourly emission rate. This approach was used for the SIL evaluation and for the 1-hour NO<sub>2</sub> NAAQS. Additionally, the Monte Carlo method, which accounts for the statistical variation in intermittent operations, was also used to assess the 1-hour NO<sub>2</sub> NAAQS. Both analyses are presented in the summary tables that follow.

### **NO<sub>2</sub> Modeling Procedures**

NO<sub>2</sub> impacts were assessed using a conservative Tier 2 analysis using the Ambient Ratio Method Version 2 (ARM2), adopted in the *Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the PSD Program* (6/29/10). ARM2 adjusts the modeled NO<sub>x</sub> concentrations based on an empirical relationship between ambient NO<sub>x</sub> and ambient NO<sub>2</sub> concentrations. ARM2 was also used for the intermittent source operations modeling using the EPA annualized emissions methodology.

A Tier 3 analysis was additionally used to assess the intermittent source 1-hour NO<sub>2</sub> concentrations using the Monte Carlo method. Here, the plume volume molar ratio method (PVRMR) was used with concurrent ambient ozone data collected at the SE Lafayette monitoring site. As the source of the background air quality data to be used in the modeling analysis, SE Lafayette has been shown above to be representative of the Project sites. The use of hourly ozone data requires that it be based on the same years as the AERMOD meteorology data. NO<sub>2</sub>/NO<sub>x</sub> ratios were based on Cummins (the engine manufacturer) supplied data for the 3,000 horsepower engines (or larger) at 0.05. All other diesel equipment used a 0.10 NO<sub>2</sub>/NO<sub>x</sub> ratio from the EPA ISR database.

### **Intermittent Source Modeling Procedures**

For the 1-hour short-term averaging times, AERMOD was used to determine the worst-case group of engines from the specific engine source groups listed in Table 11. This table represents the typical testing schedule for the different groupings of generators. As noted earlier, no more than 10 engines will be tested in any one day. For determining the 1-hour NO<sub>2</sub> and SO<sub>2</sub> modeled concentrations, each of the 20 groups were modeled as separate source groups with all of the engines within each source group assumed to be running. Thus, depending on the source group that is being modeled, anywhere from three (3) to

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<sup>2</sup> EPA Memorandum, "Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub>, National Ambient Air Quality Standard", March 1, 2011.

<sup>3</sup> Ibid





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seven (7) engines could be tested in any one hour. The engines are only tested between the hours of 8:00 AM and 6:00 PM (10 hours per day).

For the 1-hour NO<sub>2</sub> NAAQS using the EPA methodology, the engine emission rates were based on the maximum hourly rate which was then prorated to an annual average emission rate, assuming 25 hours per year of usage. For the Monte Carlo method, the maximum hourly emission rate was used. In both cases, the engines were at 100 percent load. For the 1-hour CO and SO<sub>2</sub> averaging period, the maximum hourly emission rate was used with the source groups listed in Table 11.

Additional short-term periods of 1, 8 and 24-hours were also modeled with AERMOD, but to determine the worst-case group of engines, a different method was utilized. As noted, each of the 20 engine source groups are made up of anywhere from three (3) to seven (7) engines. Up to 10 engines can be tested during each day. Rather than trying to identify which 10 engines out of the 20 source groups would be tested for the 8 and 24-hour averaging periods, each engine was assumed to operate for up to 10 hours. Thus, each engine became a specific source group, and each engine was assumed to operate up to 10 hours a day with all the 10 hours of emissions emitted from a single stack (8:00 AM to 6:00PM) to conservatively represent up to 10 different engines operating one hour each in any one day as appropriate for 8-hour and 24-hour averaging times (i.e., 8 engines for 8-hour averaging times and 10 engines for 24-hour averaging times). Please note for the 8-hr CO runs, to account for 10 engines in the 8-hour period, the hourly CO emission rate was ratioed by 10/8. Thus, the worst-case engine location could be determined from the analysis with all emissions occurring from a single engine (representative of the 8 and/or 10 engines being tested) for comparisons with the 8-and 24-hour short-term standards. The worst-case engine was then used for all subsequent modeling for the 1 and 8-hour CO averages and 24-hour SO<sub>2</sub> and PM-10/PM-2.5 averages.

### Identifying the Combined Maximum Impact Location – Screening Modeling Procedures

While either the maximum modeled single engine or group of engines from Table 11 was identified from modeling just those 20 groups in AERMOD, the location may not correspond to the maximum location of the steady state source impact locations, which is important to identify to determine the overall maximum modeled concentrations. So, to determine the combined maximum impact for the 1, 8 and 24-hour averaging periods, where the intermittent sources would contribute the highest concentration to the steady state source impact location(s), the top 10 receptor locations where the steady state sources maximum impact occurred were input into AERMOD based on the following:

- All 20 engine source groups were input to determine the 1-hour NO<sub>2</sub> concentration using the EPA 1-hour method (annual average emissions rates).
- Each individual engine input as an individual source group with the maximum 1-hour emission rate (1-hr SO<sub>2</sub> and CO).
- Each individual engine input as an individual source group with the maximum 8-hour emission rate ratioed by 10/8 (8-hr CO) to account for 10 engines tested in 8 hours.
- Each individual engine input as an individual source group with 1-hours of the maximum hourly emission rate (24-hr SO<sub>2</sub> and PM-10, PM-2.5).

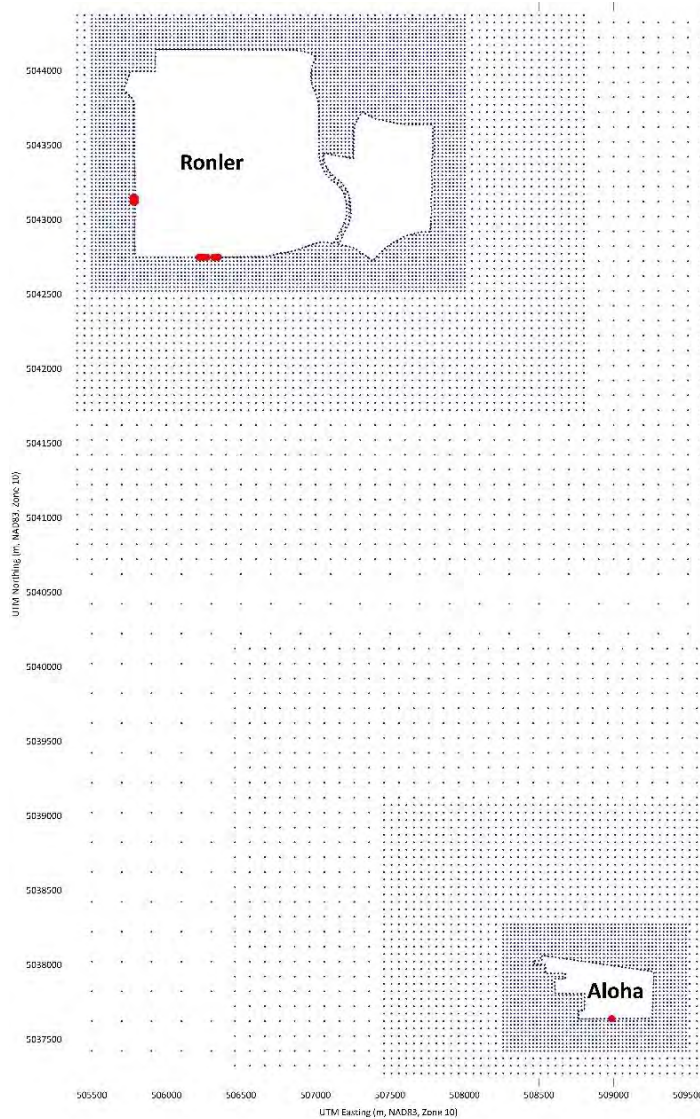
To illustrate this screening procedure, the top ten locations of the steady state 24-hour PM-2.5 concentrations, based on the form of the NAAQS, are presented in Figure 10. All engine source groups or



# AIR QUALITY IMPACT ASSESSMENT

the single engines as individual source groups were then run in AERMOD at these ten receptor locations. The engine groups or single engine that resulted in the highest concentration was then selected to be used in the subsequent modeling analyses for the SILs, NAAQS, and PSD increment assessments. Note, the Monte Carlo analysis was treated as a separate modeling procedure and is not associated with this screening method.

**Figure 10**  
**Locations of the 10 Maximum 24-Hour PM-2.5 H8H Receptors**



Using this procedure, the 1-hour NO<sub>2</sub> screening results identified engine source group G03 (with six (6) engines tested during the same hour between 8:00 AM and 6:00 PM) as contributing the highest concentration to the steady state maximum source impact location(s). Group G03 was then used in the assessment of the project SILs, PSD increment and NAAQS analyses.



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Table 11 Monte Carlo Generator Groups			
Group ID	Engine Count	Day	Generator IDs
G01	5	1	EGR1_01-EGR1_04, EGRB1_01
G02	7	2	EGDC_01-EGDC_05, EGRP1_01 EGRP1_02
G03	6	3	EGDD_01-EGDD_06
G04	4	4	EGRS4_01, EGRS6_01, EGRS6_02, EGDD_07
G05	6	5	EGE1_01-EGE1_06
G06	6	6	EGE1_07-EGE1_13
G07	6	7	EGE1_14-EGE1_18
G08	4	8	EGE1_19-EGE1_21, EGC5_16
G09	4	9	EGC5_17-EGC5_20
G010	4	10	EGC5_21, EGC5_01-EGC5_03
G011	4	11	EGC5_04-EGC5_07
G012	4	12	EGC5_08-EGC5_11
G013	4	13	EGC5_12-EGC5_15
G014	5	14	EGDB_01-EGDB_03, EGDA_01-EGDA_02
G015	3	15	EGDA_03, EGDA_04, EGDA_05
G016	3	1	EGDA_06-EGDA_08
G017	5	15	EGF15_01-EGF15_03, EGF5_01, EGF5_02
G018	4	4	FIPH1_01, FIPH2_01, FIRS4_01, FIC5_01
G019	2	8	EGIW_01-EGIW_02
G020	4	14	EGN2_01, EGIW_03, EGRS8_01, EGH2_01
Total Engines	90		

For the remaining pollutants and averaging periods, Table 12 presents engine groups or individual single engine (based on 10 hours of emissions) that was identified as contributing the highest concentrations.

Table 12 Identified Generator Groups from the Screening Modeling			
Group ID	Engine ID <sup>1</sup>	Pollutant	Averaging Period <sup>2</sup>
G17	-	CO	1-HR
-	EGF15_01	CO	8-HR
-	EGRS6_01	PM-10	24-HR
-	EGRS6_01	PM-2.5	24-HR
G17		SO <sub>2</sub>	1-HR
-	EGF15_01	SO <sub>2</sub>	24-HR
G03		NO <sub>2</sub>	1-HR

<sup>1</sup> 1-hr CO, SO<sub>2</sub> and NO<sub>2</sub> used the specific source groups in Table 11.  
<sup>2</sup> Annual modeling used all 90 diesel engines for the SIL, NAAQS and Increment Analyses



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### 1-Hour NO<sub>2</sub> Using the Monte Carlo Analysis

For 1-hr NO<sub>2</sub>, a Monte Carlo Simulation was also used as requested by the ODEQ to estimate the NO<sub>2</sub> impacts from running intermittent emergency generators. In permitting, AERMOD design values (e.g. 98 percentile) are added to background design values. In the case of generators which run infrequently (~1% of the time), the impacts of the generators are statistically likely not to occur on the high background hours. Thus, modeling the generators as continuous source greatly overestimates the occurrences of exceedances as the high modeled impacts are added to the high background under all conditions. A Monte Carlo simulation is used to model the probability of different outcomes in a process that cannot easily be predicted due to the intervention of random variables. For example, the specific hour/day that a set of generators will run is generally unknown. The operation of the generators may or may not correspond to a poor dispersion period, as the occurrence of these events is essentially random.

For this approach, continuous sources were run with the seasonal diurnal NO<sub>2</sub> background to calculate the continuous high-eighth-high (98<sup>th</sup> percentile) NO<sub>2</sub> concentration at each receptor, which provides a conservative estimate for the continuous source contribution. Next, the model is run without background for the 20 groups of generators, for the 10-hour daylight period. It is assumed that all generators within each source group are running at the same time. The groups are shown in Table 11. The output is hourly NO<sub>2</sub> concentrations for the 20 generator groups for a 5-year period. It is assumed that the 20 groups are tested over 15 days. Thus, five of the days will have two generator groups run on different hours.

For a Monte Carlo Simulation, fifteen randomly selected days for each month are pulled from the 5-year block for that month. The days correspond to the generator groups (e.g. day 1 = group 1, day 2 = group 2, etc.). For each day, an hour is randomly selected between 8:00 AM and 6:00 PM that generators will run. For days with a second group, another different hour is selected for the second generator group (same day though). The higher of the two concentrations is saved.

The above process is repeated for each month for all of the years of meteorology. Once the selection process is completed, the highest eight daily concentrations in each year are found and ranked from highest to lowest. The three year highest-eighth-high values are averaged on a receptor basis and saved.

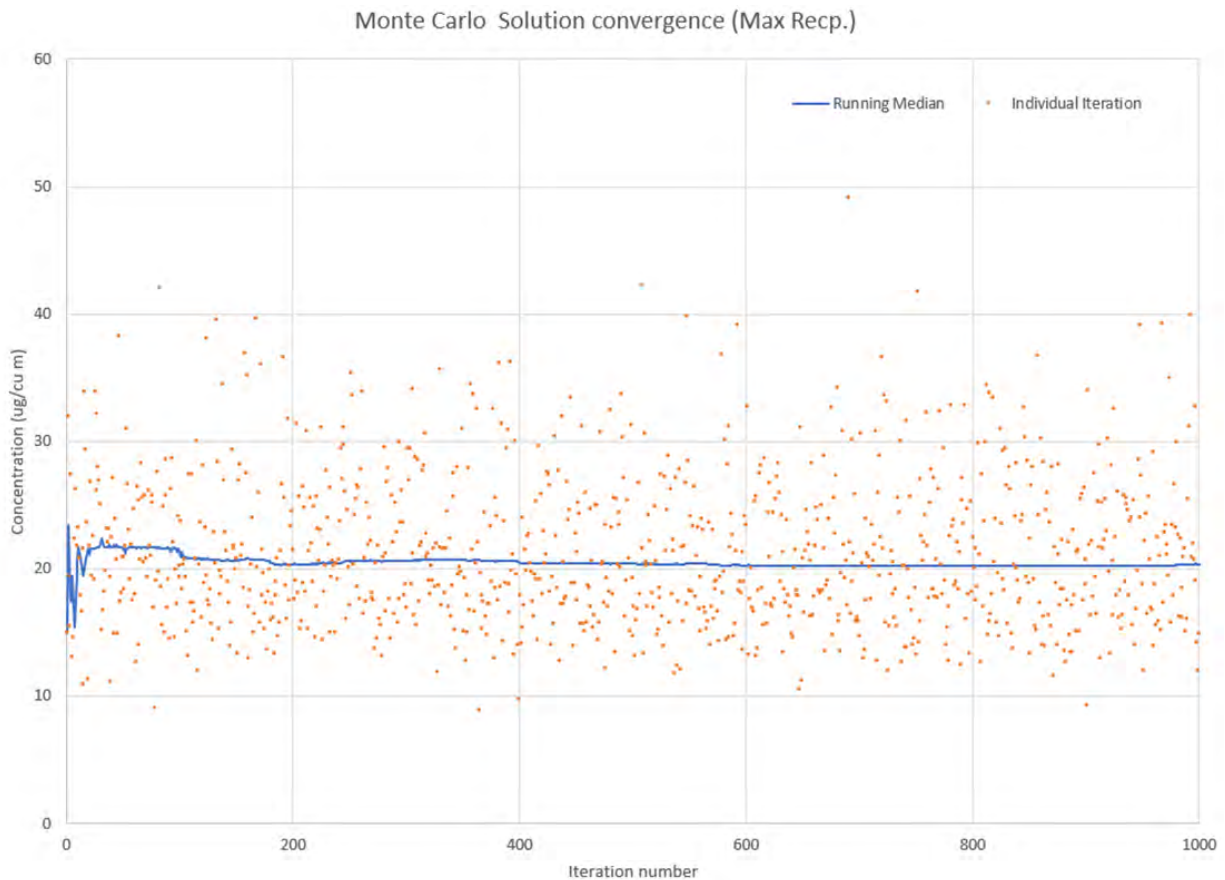
This process is repeated 1000 more times (giving 1001 iterations). To demonstrate, Figure 11 shows the convergence of the median value as more iterations are added to the median for the receptor with the higher generator impact. Within a couple hundred iterations, the median stabilizes and is near the final value. After about 400 iterations, the running median value is within 99% of the final value. Thus, the use of 1001 iterations should provide a stable median value.

The results are tabulated and then the median value is determined at each receptor. The median values are then added to the continuous source modeled contributions, on a receptor-by-receptor basis to provide the design values at each receptor. The seasonal hour by day background NO<sub>2</sub> is added in with the steady state sources in AERMOD.

The Monte Carlo Simulation calculations were executed in an Excel macro-enabled spreadsheet which was provided to the ODEQ. The combined concentration spreadsheet calculations will be provided to the ODEQ.



**Figure 11**  
**Convergence Criteria**



## **MERP Analysis for Secondary PM-2.5 and Ozone Formation**

The EPA developed a Tier 1 demonstration tool for ozone and PM-2.5 precursor emissions called Modeled Emission Rates for Precursors (MERPs). The development of the tool and related guidance is summarized in a memorandum from EPA dated April 30, 2019, with a subject, "Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for ozone (O<sub>3</sub>) and PM-2.5 under the PSD Permitting Program." The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutant impacts from specific or hypothetical sources. The ODEQ used the air quality modeling results presented in EPA MERPs memorandum to derive MERPs for hypothetical sources located in the Western U.S.

MERPs can be used to demonstrate that projected impacts from a proposed source are less than the applicable SILs or when included with the modeling results, would not cause or contribute to a violation of a NAAQS or PSD increment for that pollutant.



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The MERP is based on a hypothetical source emission rate, the modeled concentration from that emission rate, and the relevant SILs for O<sub>3</sub> and PM-2.5 (1 ppb for O<sub>3</sub>, 1.2 µg/m<sup>3</sup> for 24-hr PM-2.5, and 0.2 µg/m<sup>3</sup> for annual PM-2.5). The lowest MERP value for each precursor identifies the most conservative condition. EPA provides a lookup table (MERPs View Qlik) which contains MERP data for the United States, from which, for the Tier I analysis, the smallest MERP values were used for the 8-hour O<sub>3</sub> impact assessment and the 24-hour and annual PM-2.5 assessments. ODEQ recommends the use of the Morrow, Oregon site, which is located near Arlington on the Columbia River. For the Tier I analysis, the smallest MERP values were used for the 8-hour O<sub>3</sub> impact assessment and the 24 and annual PM-2.5 assessment.

The MERP analysis used the following emissions data as input which is based on the project total PSEL:

- NO<sub>x</sub> - 402 tpy
- VOC - 349 tpy
- PM-2.5 - 55 tpy
- SO<sub>x</sub> - 39.0 tpy

The basic form of the equations for PM-2.5 is:

$$S = SIL \left[ \frac{Q_{NOx}}{MERP_{NOx}} + \frac{Q_{SOx}}{MERP_{SOx}} \right]$$

For O<sub>3</sub>, the equation takes the form of:

$$S = SIL \left[ \frac{Q_{NOx}}{MERP_{NOx}} + \frac{Q_{VOC}}{MERP_{VOC}} \right]$$

where:

S = final concentration

SIL = significant impact level

- 24-hr PM-2.5 = 1.2 µg/m<sup>3</sup>
- Annual PM-2.5 = 0.2 µg/m<sup>3</sup>
- 8-hr O<sub>3</sub> = 1 ppb

Q = mass emissions in tons per year

MERP = MERP in tons per year from Table 13 for each applicable precursor

Table 13 provides the MERPs View Qlik data for Morrow, Oregon based on a hypothetical 500 ton per year source with a stack height of 10 meters. This data along with the project specific PSEL data and applicable SILs were used in the equations to determine secondary PM-2.5 and ozone formation. A copy of the MERP data from View Qlik is also provided in Attachment B.



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Table 13 MERP View Qlik Data							
State	County	Metric	Precursor	Emissions TPY	Stack Height	MERP TPY	Max Concentration ug/m <sup>3</sup>
Oregon	Morrow	8-hr Ozone	NO <sub>x</sub>	500	10	258	1.939569
Oregon	Morrow	8-hr Ozone	VOC	500	10	1,087	0.46018
Oregon	Morrow	Annual PM-2.5	NO <sub>x</sub>	500	10	7,942	0.012591
Oregon	Morrow	Annual PM-2.5	SO <sub>2</sub>	500	10	11,877	0.008419
Oregon	Morrow	Daily PM-2.5	NO <sub>x</sub>	500	10	3,003	0.19979
Oregon	Morrow	Daily PM-2.5	SO <sub>2</sub>	500	10	2,314	0.259274
Stack height in meters							

### *PM-2.5 24-hr avg. analysis*

- For NO<sub>x</sub> the lowest MERP is 3,003 for a hypothetical 500 tpy source and a concentration of 0.19979 ug/m<sup>3</sup>
- For SO<sub>x</sub> the lowest MERP is 2,314 for a hypothetical 500 tpy source and a concentration of 0.25927 ug/m<sup>3</sup>  
Secondary 24-hr PM-2.5 formation = 0.181 µg/m<sup>3</sup>

### *Annual PM-2.5*

- For NO<sub>x</sub> the lowest MERP is 7,942 for a hypothetical 500 tpy source and a concentration of 0.01259 ug/m<sup>3</sup>
- For SO<sub>x</sub> the lowest MERP is 11,877 for a hypothetical 500 tpy source and a concentration of 0.00842 ug/m<sup>3</sup>  
Secondary annual PM-2.5 formation = 0.0108 µg/m<sup>3</sup>

### *O<sub>3</sub> 8-hr avg. analysis*

- For NO<sub>x</sub> the lowest MERP is 258 for a hypothetical 500 tpy source and a concentration of 1.9396 ppb
- For VOC the lowest MERP is 1,087 for a hypothetical 500 tpy source and a concentration of 0.46018 ppb  
Primary 8-hr O<sub>3</sub> formation = 1.88 ppb

Table 14 below compares the results of the MERP analysis to the applicable SILs, and only the 8-hr O<sub>3</sub> resultant concentration is significant. This significant concentration was then added to the background O<sub>3</sub> concentration of 61.3 ppb to produce a Project total of 63.18 ppb, which is below the 8-hr O<sub>3</sub> standard of 70 ppb. Thus, any additional impacts to the background ozone concentration will comply with the NAAQS.

Based on the results of the MERP analysis, the calculated secondary PM-2.5 concentrations were added to all modeled PM-2.5 results from AERMOD for both 24-hr and annual averaging periods.



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Table 14 Results of MERP Analyses with Comparison to PSD SILs			
Pollutant	Avg. Period	MERP Concentration	Class II PSD SILs
O <sub>3</sub>	8-Hour	1.88 ppb	1 (ppb)
PM-2.5	24-hr Max	0.181 µg/m <sup>3</sup>	1.2 (µg/m <sup>3</sup> )
	Annual Max	0.0108 µg/m <sup>3</sup>	0.2 (µg/m <sup>3</sup> )

### **Modeled Impacts on Class II Areas**

The following sections present the analyses for determining the changes to ambient air quality concentrations in the region of the Project. These analyses are based on the requirements in OAR 340-225-0050. The modeling includes the results of the diesel engine screening assessment to determine the worst-case emergency engine impacts during routine reliability testing which were combined with the project SIL modeling and refined modeling assessments used to calculate the proposed Project changes to ambient air quality, and increment/cumulative assessments.

Federal major source baseline and minor source baseline dates for NO<sub>2</sub>, SO<sub>2</sub>, PM-10, PM-2.5 and CO have already been triggered in the Project region. For determining the Project modeled concentrations which are then compared to the applicable SILs, NAAQS and PSD increments, all sources at the Gordon Moore Park at Ronler Acres and Aloha campuses were used, which includes both existing sources and the proposed new sources. No sources were excluded in any of the subsequent modeling analyses.

Emissions and stack parameters for all of the sources at Gordon Moore Park at Ronler Acres and Aloha are listed in Attachment B. These were used in all of the modeling inputs. Stack parameters (e.g., stack height, exit temperature, stack diameter, and stack exit velocity) were based on the parameters provided by Intel. Stack locations for the existing and proposed sources were matched to show their actual location based on the proposed Facility plot plan and the most recent aerial imagery.

### **Class II SILs and SMC Analyses**

OAR 340-200-0020 and 340-225-0050 prescribes the use of the Significant Impact Levels (SILs) to establish the “significant impact area” (SIA), which is used to identify the appropriate geographic area in which a multi-source NAAQS and increment impacts analysis should be conducted. The “impact area” is identified by drawing a circle around the site with a radius equal to the distance to the farthest location where an exceedance of the SIL is modeled to occur. The impact area is the geographical area for which the required air quality analyses for the NAAQS and PSD increments are carried out. This area includes all locations where the significant increase in the potential emission of a pollutant from a new or modified source, or significant net emission increase from a modification, will cause a significant ambient impact (i.e., equal or exceed the applicable SIL). This impact area is then also used in a multi-source cumulative impacts analysis to “guide the identification of other sources to be included in the modeling analyses.”

To assess the Class II significance levels of the modeled concentrations, the following averaging periods were used:





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- 1-hour NO<sub>2</sub> and SO<sub>2</sub> SIL was based on the 5-year average of the maximum daily 1-hour NO<sub>2</sub> concentrations modeled each year at each receptor.
- Annual NO<sub>2</sub> and SO<sub>2</sub> SIL was based on the maximum annual average concentration for the five (5) year period modeled for each receptor.
- 1-hour and 8-hour CO SILs were assessed based on the maximum modeled concentration at each receptor over the five (5) year period modeled for each receptor.
- Annual SO<sub>2</sub> SIL was based on the maximum annual average concentration over the five (5) year period modeled for each receptor.
- 24-hour PM-2.5 SIL was based on the 5-year average of the maximum 24-hour PM-2.5 concentrations modeled each year at each receptor.
- 24-hour PM-10 SIL was based on the maximum 24-hour concentration over the five (5) years modeled for each receptor.
- Annual PM-2.5 SIL was based on the 5-year average of the annual average concentration modeled each year at each receptor.

### Proposed PM-2.5 SIL

The proposed Class I and Class II PM-2.5 SILs for this project are identical to the EPA established SILs. With respect to reliance on the PM-2.5 SILs, EPA has cautioned that reliance on the SILs alone to demonstrate that a source will not cause or contribute to a violation of the PM-2.5 NAAQS is inadequate. However, EPA stated that permitting authorities have the discretion to select and utilize a PM-2.5 SIL value if there is sufficient justification for the selected SIL value and justification in the manner in which it will be used. The SIL values for PM-2.5 in EPA regulations can also continue to be used if the permitting authority also takes background concentrations of PM-2.5 into account. For this Project, the difference between the PM-2.5 NAAQS and the monitored PM-2.5 background concentrations in the area is greater than the SILs. Based on the data in Table 17, over 41 percent of the available standard is still available. Thus, given the amount of available PM-2.5 standard in the Project region, the applicant with ODEQ approval used the EPA PM-2.5 SILs for both Class I and Class II modeling assessments.

### SIL Results

Following the requirements of OAR 340-225-0050, the maximum concentrations from the SIL analyses are summarized in Table 15. Only the 1 and 8-hr CO modeled CO concentrations were less than the applicable SILs and no further analyses of CO is required. All other criteria pollutants exceeded the Class II SILs. For SO<sub>2</sub>, the Project does not trigger the requirements of PSD and the modeling analyses for this pollutant was not taken any further other than to add in the background SO<sub>2</sub> concentration data from the ambient monitors identified in the previous section.

To calculate the size of the combined “impact area” from both campuses, the center point between the Gordon Moore Park at Ronler Acres and Aloha sites was used to measure maximum distance from the Project for the furthest significant impact for each significant pollutant. It’s noted that for the 1-hour NO<sub>2</sub> SIL, the modeling results extended outward by 18.7 km. Based on EPA modeling guidelines which focus on the 10 km distances for cumulative 1-hour NO<sub>2</sub> assessments, the use of the 18.7 km radius significant impact area (SIA) for the multisource NAAQS and increment assessments would be considered conservative. Table 15 lists the areal extent of the SIAs for each pollutant and averaging period. Attachment C includes figures that display the areal extent of the SIA for each pollutant and averaging period.



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Table 15 Air Quality Impact Results for Significant Impact Levels*				
Pollutant	Averaging Period	Maximum Concentration ( $\mu\text{g}/\text{m}^3$ )	Class II SIL ( $\mu\text{g}/\text{m}^3$ )	Significant Impact Area Radius (km)
Steady State and Intermittent Source Operating Conditions*				
NO <sub>2</sub> <sup>a</sup>	1-hr 5-year Avg of Max's	116.15	7.5	18.71
	Annual Max	13.25	1.0	8.53
CO	1-hour Max	708.80	2,000	N/A
	8-hour Max	199.60	500	N/A
PM-10	24-hour Max	9.28	1	6.35
	Annual Max	2.09	0.2	6.39
PM-2.5 <sup>b</sup>	24-hr 5-yr Avg of Max's	7.59	1.2	6.94
	5-yr Avg of Annual Concentrations	1.74	0.2	6.95

<sup>a</sup> NO<sub>2</sub> 1-hour and annual impacts evaluated using ARM2. Emergency generators included using EPA modeling procedure.  
<sup>b</sup> PM-2.5 modeled concentrations were adjusted by the MERP results to account for secondary PM-2.5 formation.  
 \* All sources (new and existing)

ODEQ regulation (OAR 340-224-0070(1)(a)) also requires an applicant to provide preconstruction monitoring data for purposes of use in the Source Impacts Analysis. However, a source is exempt from this requirement if its modeled impact for each applicable pollutant in any area is less than the pollutant-specific SMC, which EPA has generally established as five times the lowest detectable concentration of a pollutant that could be measured by available instrumentation. As noted in OAR 340-224-0070(1)(a)(B), "DEQ may exempt the owner or operator of a source from preconstruction monitoring for a specific regulated pollutant if the owner or operator demonstrates that the air quality impact from the emissions increase would be less than the amounts listed below, or that modeled competing source concentrations plus the general background concentration of the regulated pollutant within the source impact area, as defined in OAR 340 division 225, are less than the following significant monitoring concentrations....". Table 16 lists the SMCs for each applicable pollutant. The maximum Project modeled concentration of 7.59  $\mu\text{g}/\text{m}^3$  exceeds the SMC for the 24-hour PM-2.5 averaging period. As noted, the Project is not subject to PSD for SO<sub>2</sub>.

Even if a source's potential impact exceeds the corresponding SMC, that does not necessarily mean the applicant must install and operate a new monitor at the Project. Rather, according to EPA guidance, an applicant may satisfy the preconstruction monitoring obligation in one of two ways: (i) Where existing ambient monitoring data is available from representative monitoring sites, the permitting agency may deem it acceptable for use in the Source Impacts Analysis; or (ii) where existing, representative data are not available, then the applicant must obtain site-specific data.



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Table 16 Significant Monitoring Concentrations*	
<b>CO: 8-hr average</b>	575 µg/m <sup>3</sup>
<b>PM-10: 24-hr average</b>	10 µg/m <sup>3</sup>
<b>PM-2.5 24-hr average*</b>	4 µg/m <sup>3</sup>
<b>NO<sub>2</sub>: annual average</b>	14 µg/m <sup>3</sup>
<b>SO<sub>2</sub>: 24-hr average</b>	13 µg/m <sup>3</sup>
Note: The 24-hour PM-2.5 SMC has been vacated. *Only the proposed new sources were assessed for the SMC	

As a general matter, the permitting agency has substantial discretion “to allow representative data submissions (as opposed to conducting new monitoring) on a case-by-case basis.” OAR 340-224-0070(1)(a)(vii) states *“With DEQ’s approval, the owner or operator may use representative or conservative background concentration data in lieu of conducting preconstruction air quality monitoring if the source demonstrates that such data is adequate to determine that the source would not cause or contribute to a violation of an ambient air quality standard or any applicable PSD increment.”* In determining whether existing data are representative, EPA guidance has emphasized consideration of three factors: monitor location, data quality and currentness of the data. The permitting agency also may approve use of data from a representative “regional” monitoring site for purposes of the NAAQS compliance demonstration.

As noted in Table 16, the PM-2.5 SMC has been vacated. Nevertheless, Intel has proposed utilizing existing monitoring data from the nearby Hare Field as a current and representative estimate of background concentrations. The spatial scale for Hare Field is neighborhood scale which is used for highest concentration, population exposure and general background. Additionally, for PM-2.5 the spatial coverage, currentness and representative conditions to the Project of the existing monitoring stations would satisfy the ODEQ and EPA requirements for waiving the preconstruction monitoring requirements for this pollutant. Intel has utilized representative existing monitoring data as the basis for its preconstruction air quality analyses.

In addition to the SILs and SMC’s, a preliminary analysis was performed to determine if the SIL is protective of the NAAQS for applicable pollutants and averaging periods, consistent with the ODEQ Recommended Procedures document. This analysis is done by subtracting the ambient background from the NAAQS to determine if the SIL, as a significance threshold, is protective. As shown in Table 17, the preliminary NAAQS review values are significantly greater than the SILs, which indicates there is sufficient headroom between ambient background and the NAAQS for the SILs to be an appropriate test.



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Table 17 Comparison of SILs to Background					
Pollutant	Ave Time.	Background ( $\mu\text{g}/\text{m}^3$ )	Class II SIL ( $\mu\text{g}/\text{m}^3$ )	Background + SIL ( $\mu\text{g}/\text{m}^3$ )	NAAQS ( $\mu\text{g}/\text{m}^3$ )
PM-2.5	24	20.7	1.2	21.9	35
PM-2.5	Annual	6.6	0.2	6.9	12
PM-10	24	39.0	1	40.0	150
NO <sub>2</sub>	1	56.3	7.5	63.7	188
NO <sub>2</sub>	Annual	18.1	1	19.1	100

CO was modeled to be less than the 1 and 8-hr SILs. SO<sub>2</sub> not subject to PSD.

### Project Only National Ambient Air Quality Impact Analyses

In evaluating the impacts of the proposed Project on ambient air quality, the modeled concentrations of the Project were added to the monitored background concentrations and compared to national ambient standards for SO<sub>2</sub>, NO<sub>2</sub>, PM-10 and PM-2.5. These results are summarized in Table 18 and only represent the Intel sources plus background. For the 1-hour NO<sub>2</sub> NAAQS analyses which include the intermittent sources, both the EPA modeling methodology and Monte Carlo results are presented.

All of the maximum concentrations occurred in the immediate vicinity of proposed Project, either on the Facility fencelines or on the downwash receptor grid. Figure 8 presents the locations of the maximum impacts by pollutant. These maximum concentrations for all five (5) years of meteorological data modeled were used for comparison to the NAAQS. The form of the NAAQS includes the High Sixth-High (H6H) values for the 24-hour PM-10; the 5-year average of the annual 98<sup>th</sup> percentile 1-hour daily maxima for the 1-hour NO<sub>2</sub> NAAQS and, for PM-2.5, the 5-year average of the annual 98<sup>th</sup> percentile 24-hour impacts and the 5-year average of the annual impacts. Sources of fugitive dust (PM-10 and PM-2.5) were included and modeled as area sources. Compliance with the NAAQS was demonstrated for all pollutants and averaging times.

Table 18 Intel Facility Sources (New+Existing) Modeling Results					
Pollutant	Averaging Period	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Background ( $\mu\text{g}/\text{m}^3$ )	Total ( $\mu\text{g}/\text{m}^3$ )	National Ambient Air Quality Standards ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1-hr 5-yr Avg of 98 <sup>th</sup> %	EPA Method 163.54 <sup>a</sup>	-	163.54	188
	1-hr 5-yr Avg of 98 <sup>th</sup> %	Monte Carlo 170.89 <sup>b</sup>	-	170.89	188
	Annual Max	13.25	35.6	48.85	100
SO <sub>2</sub>	1-hr 5-yr Avg of 99 <sup>th</sup> %	39.97	7.0	46.97	196



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	24-hr Avg	18.38	4.7	23.08	1,300
	Annual Max	3.83	1.1	4.93	80
PM-10	24-hour H6H	7.78	39.0	46.78	150
PM-2.5 <sup>c</sup>	24-hr 5-yr Avg of 98 <sup>th</sup> %	4.50	20.7	25.38	35
	5-yr Avg of Ann Conc's	1.73	6.6	8.35	12.0
<sup>a</sup> NO <sub>2</sub> 1-hour and annual impacts evaluated using the ARM2. Seasonal hour by day added in model. <sup>b</sup> NO <sub>2</sub> 1-hr evaluated with PVMRM with the NO <sub>2</sub> /NO <sub>x</sub> ratios as described previously. Background from seasonal hour by day in AERMOD. <sup>c</sup> PM-2.5 24-hour and annual concentration adjusted by 0.181 and the annual by 0.0108 to reflect secondary PM-2.5 formation.					

### **Multisource Increment and NAAQS Modeling Analyses**

The multisource increment and cumulative NAAQS analysis was prepared by using the following basic methodology:

- Establish the radial extent of the SIA based upon the modeled impacts for each pollutant standard. The distance from the source to the furthest impact that is equal to or above an applicable SIL establishes the radius of the area to evaluate. These are summarized in Tables 15 and Table 19
- Obtain from the local air agencies, emission inventories and stack parameters of significant and competing sources within the area to be evaluated. This inventory was provided by the ODEQ based on a radial distance from the source of 50 kilometers.
- Include an additional screening area beyond the furthest distance of the SIA to include significant sources that could contribute to modeled background.
- Model all the sources together to determine the air quality impacts within the SIA for comparison with the increment.
- Add in a monitored background for the NAAQS analyses and if the sum is below the standard, the Project does not contribute to exceedances of the standard.
- If the sum is above the increment or standard, perform a culpability analysis to determine if the Project's emissions contribute a significant impact (in both time and/or space) to the modeled exceedances.

Under EPA's PSD regulations and OAR 340-225-0050, an applicant must conduct a "source impact analysis", which demonstrates that "allowable emission increases from the source in conjunction with all other applicable emissions increases or reductions (including secondary emissions), would not cause or contribute to air pollution in violation of: (1) Any NAAQS in any region; or (2) Any applicable maximum allowable increase (increment) over the baseline concentration in any area."

If a source's modeled impact at any offsite location exceeds the relevant SIL, the source owner must then conduct a "multi-source" (or "cumulative") air quality analysis to determine whether or not the source's emissions will cause or contribute to a violation of the relevant NAAQS or applicable PSD increment. The PSD increment consumption analysis assures that, in those locations currently meeting the federal NAAQS



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(i.e., those deemed “attainment” or “unclassifiable”), the concentration of a given pollutant cannot increase by an amount greater than the “maximum allowable increase” specified by the Clean Air Act and/or the PSD regulations for the particular pollutant since the baseline date.

EPA in the 2003 Appendix W to 40 CFR part 51 (68 FR 18439/18440) Modeling guidance prescribes the use of the SILs to establish the SIA, which is used to identify the appropriate geographic area in which a multi-source NAAQS and increment impacts analysis should be conducted. The impact area is the geographical area for which the required air quality analyses for the NAAQS and PSD increments are carried out. Per EPA Appendix W guidance, the larger impact area was then surveyed to identify other “nearby sources”, which also should be included in the cumulative impact’s analysis. Both Appendix W and the EPA Draft NSR Workshop Manual (October 1990) require that the cumulative and increment impacts analysis to include “nearby sources”, which includes “[a]ll sources expected to cause a significant concentration gradient in the vicinity of the source or sources under consideration.” Appendix W further instructs that the “impact of nearby sources should be examined at locations where interactions between the plume of the point source under consideration and those of nearby sources (plus natural background) can occur”. Emphasizing that “[t]he number of sources is expected to be small except in unusual situations”.

This area additionally included all sources out to a 50 km distance from the edge of the SIA (called the screening area or Range of Influence (ROI)) where the significant increase in the potential emission of a pollutant from a new source, or significant net emission increase from a modification, will cause a significant ambient impact (i.e., equal or exceed the applicable SIL). This impact area is then also used in a multi-source cumulative impacts analysis to “guide the identification of other sources to be included in the modeling analyses.”

The center point between the Gordon Moore Park at Ronler Acres and Aloha campus was chosen as the center point for each of the SIAs. For NO<sub>2</sub>, the maximum extent of receptors with modeled 1-hour NO<sub>2</sub> impacts greater than or equal to the SIL of 7.5 µg/m<sup>3</sup> (based on the five-year average of maximum annual 1-hour impacts) extended outwards to 18.7 kilometers (km). For the other pollutant SILs, the SIA extended outwards from 6.3 to 8.5 km. For each pollutant and averaging period, for both the increment and NAAQS analyses, all receptors within the maximum radius of each of the SIAs were included in the modeling analysis. Thus, each SIA receptor grid used in the modeling for the significant impacts contains both the significant receptor locations as well as those receptors that are within the maximum radius of the SIA. These receptor grids are summarized in Table 19 and are also included in Attachment C which contains a listing of the receptor file names that were used within each of the SIAs.



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**Table 19**  
**Listing of SIA Receptor Grids**

Pollutant	Averaging Period	Class II SIL (ug/m3)	Significant (Y/N)	Max Distance (m)	Number of Receptors within SIL Radius	Receptors Falling Within SIL Radius File Name	Number of Receptors Exceeding SIL	Receptors Exceeding SIL File Name
CO	1-HR	2000	N	-	-	-	-	-
	8-HR	500	N	-	-	-	-	-
SO <sub>2</sub>	1-HR	7.8	Y	-	-	-	-	-
	24-HR	5	Y	-	-	-	-	-
	Annual	1	Y	-	-	-	-	-
PM-10	24-HR	1	Y	10,224	19,936	Intel-Hillsboro-24HR-PM10-Radius.ROU	16,594	Intel-Hillsboro-24HR-PM10-Exceed.ROU
PM-10	Annual	0.3	Y	8,233	18,644	Intel-Hillsboro-ANNUAL-PM10-Radius.ROU	12,690	Intel-Hillsboro-ANNUAL-PM10-Exceed.ROU
PM-2.5	24-HR	1.2	Y	6,941.5	19,874	Intel-Hillsboro-24HR-PM25-Radius.ROU	10,475	Intel-Hillsboro-24HR-PM25-Exceed.ROU
PM-2.5	Annual	0.2	Y	6,952.0	16,892	Intel-Hillsboro-ANNUAL-PM25-Radius.ROU	6,451	Intel-Hillsboro-ANNUAL-PM25-Exceed.ROU
NO <sub>2</sub>	1-HR	7.5	Y	18,709.2	21,662	INTEL-1STSIL-1HR-NO2-Radius.ROU	21,599	INTEL-1STSIL-1HR-NO2-Exceed.ROU
	Annual	1	Y	8,531.5	18,899	Intel-Hillsboro-ANNUAL-NO2-Radius.ROU	13,709	Intel-Hillsboro-ANNUAL-NO2-Exceed.ROU

Based on the previous results of the SIL analyses as summarized in Table 15, increment consumption for 24-hour and annual PM-2.5, 24-hour and annual PM-10 and annual NO<sub>2</sub> were assessed. There are no PSD increments for 1-hour NO<sub>2</sub> and SO<sub>2</sub> was not emitted at the major (PSD) source levels. It should be noted that the annual PM-10 NAAQS has been revoked but the annual increment remains in place. Table 20 presents the Class II PSD increment limits used in the modeling analyses.

The major and minor source baseline dates for NO<sub>2</sub>, PM-10 and PM-2.5 have already been triggered, so the increment modeling analyses included developing an initial list of increment consuming sources in the airshed. ODEQ provided an emission inventory of all NO<sub>2</sub> sources within 50 km and 20 km for the PM-10 and PM-2.5 sources of the Project. The inventory listed 221 individual sources and contained the source locations, PSEL emission rates and stack parameters. A complete copy of this inventory is provided in Attachment C.



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Table 20		
PSD Class II Increments		
Pollutant/Avg. Period		Class II Increment ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1-hour	-
	Annual	25
PM-10	24-hour	30 <sup>a</sup>
	Annual	17
PM-2.5	24-hour	9 <sup>a</sup>
	Annual	4
<sup>a</sup> Not to be exceeded more than once per year		

The ODEQ emissions inventory is based on the source’s permitted emission limits and does not include any information on the source’s actual emissions. PSD increment modeling is based on actual emissions so as to establish the actual expansion or contraction of the available increment. As such, it was assumed that in the absence of a distinct increment (actual emission) inventory, all provided background sources were to be considered as increment consuming sources using the permitted PSEL’s from each source. This results in an overestimate of the increment consumption in the air basin.

To limit the total number of sources used in the increment and cumulative NAAQS analyses, sources were excluded from the ODEQ lists if their emissions of NO<sub>x</sub>, PM-10 and PM-2.5 were less than one (1) ton per year. Sources with Basic or General permits were also excluded from the inventory as these permit types reflect small or insignificant source activities that do not require dispersion modeling. These small sources would not be expected to cause a significant concentration gradient within the SIA nor would they be expected to significantly contribute to the modeled concentrations within the SIA. The removal of these sources will still result in conservative modeling results. Sources where the primary emissions were VOCs were also excluded from the multisource analyses. Sources with emissions based primarily on CO were also excluded from consideration as the Project impacts are all less than the CO 1-hour and 8-hour SILs. Additionally, sources in Multnomah and North Clackamas Counties were excluded due to the blocking effect of the West Hills and would not be expected to impact the areas near the Project locations. This resulted in a list of 26 facilities as shown in Table 21.

Several adjustments were made to the competing source lists. If a combustion source had PM-10 emissions but no PM-2.5 emissions (or vis versa), it was assumed the PM-2.5 emissions were the same as the PM-10 emissions. For non-combustion sources like road dust, material handling, and storage piles, the missing PM-2.5 emissions were scaled from the PM-10 emission using the appropriate EPA AP-42 PM-2.5 and PM-10 particle size multipliers. The coordinates provided by DEQ represent an approximate facility location which, in some cases, did not represent the actual stack location. Adjustments to the facility coordinates were made using Google maps to better identify actual stack locations. These 26 facilities represent 33 individual stacks which were modeled for both increment consumption and for the NAAQS. The 33 individual stacks are presented in Table 22.

The ODEQ emissions inventory included multiple emission points for many of the sources, with emissions and either actual or default stack parameters. Where appropriate, emission points with common stack parameters were merged into a single emission point. Aggregate Insignificant Activities emissions were merged into one of the other source’s emission points. All emission points were modeled as point sources





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using the stack parameters provided by ODEQ. Short term emission rates were based on an annualized hourly emission rate. Table 22 shows the final list of competing source emission points used in the increment and NAAQS analyses. Additional details of the sources as input into AERMOD are presented in Attachment C.

Table 21 Increment and NAAQS Source List								
Permit Number	Model ID	X(m)	Y(m)	D (km)	NO <sub>x</sub> (TPY)	PM-2.5 (TPY)	PM-10 (TPY)	Source Name
34-2813	1	505425.8	5043934	1.00	1.15	0.00	0.00	"Jireh Semiconductor Incorporated"
34-0241	2	506473.2	5044990	1.38	1.97	0.03	0.03	"Flexential Colorado Corp"
34-0183	3	508014	5043820	1.45	20.90	0.70	0.70	"STACK Infrastructure, Inc."
34-2790	4	505870.9	5044457	1.50	1.99	0.00	0.00	"Tokyo Ohka Kogyo America, Inc."
34-0222	5	505596.5	5045037	1.52	2.05	0.00	0.00	"QTS Investment Properties Hillsboro, LLC"
34-0055	6	504994.8	5042902	1.57	2.50	0.06	0.06	"Qorvo US, Inc."
34-9507	7	505463.5	5044497	1.91	2.62	0.35	0.35	"Genentech, Inc."
34-0186	8	506407	5046058	2.34	21.63	1.50	1.50	"Beaver Ventures LLC"
34-0235	9	504885	5043965	4.30	1.07	0.00	0.00	"NTT Global Data Centers HI, LLC"
34-2639	10	510829	5045802	5.31	1.11	0.03	0.03	"Portland Community College"
34-2753	11	504242.9	5037930	5.59	42.80	0.87	0.87	"Clean Water Services"
34-0004	12	502344	5037386	7.34	19.12	2.78	5.95	"Hillsboro Landfill Inc."
34-2804	13	513703	5038745	8.71	1.69	0.17	0.17	"Analog Devices, Inc."
34-2638	14	514063	5038512	9.14	2.54	0.06	0.06	"Tektronix, Inc."
34-2783	15	516615	5036641	12.30	3.40	0.58	0.58	"Bimbo Bakeries USA, Inc."
34-2756	16	493752	5040722	12.95	0.00	1.87	1.87	"DMH, Inc."
34-0009	17	517194	5036298	12.98	2.08	0.00	0.00	"International Paper Company"
34-2678	18	493642	5039988	13.23	1.70	0.00	0.00	"TTM Technologies North America, LLC"
34-9514	19	518751	5030570	17.88	1.33	0.00	0.00	"Regenyx LLC"
34-0007	20	519559	5029639	19.11	0.00	4.48	4.48	"Fought & Company, Inc."
34-0063	21	516283	5025853	20.23	2.97	0.00	0.00	"Lam Research Corporation"
34-2623	22	518784	5027415	20.30	29.51	0.00	0.00	"Clean Water Services"
34-2066	23	485113.2	5034818	22.82	36.70	0.00	0.00	"Stimson Lumber Company"
36-9504	24	503921	5015168	28.44	1.32	0.00	0.00	"City of Newberg"
36-5034	25	487440	5008513	39.79	170.67	0.00	0.00	"Cascade Steel Rolling Mills, Inc."
36-0011	26	481137	5000753	49.65	51.70	0.00	0.00	"Riverbend Landfill Co."
<b>Total TPY</b>					424.5	13.5	16.6	

D=distance from the Ronler Campus  
Coordinates are UTM NAD 83, Zone 10

Based on the radial distances of the SIAs, the competing source list provided by the ODEQ was input into each model run for the multisource NAAQS and increment analyses, based on the specific SIA receptor grids listed in Table 19. The inventory contained sources that were based on the maximum potential

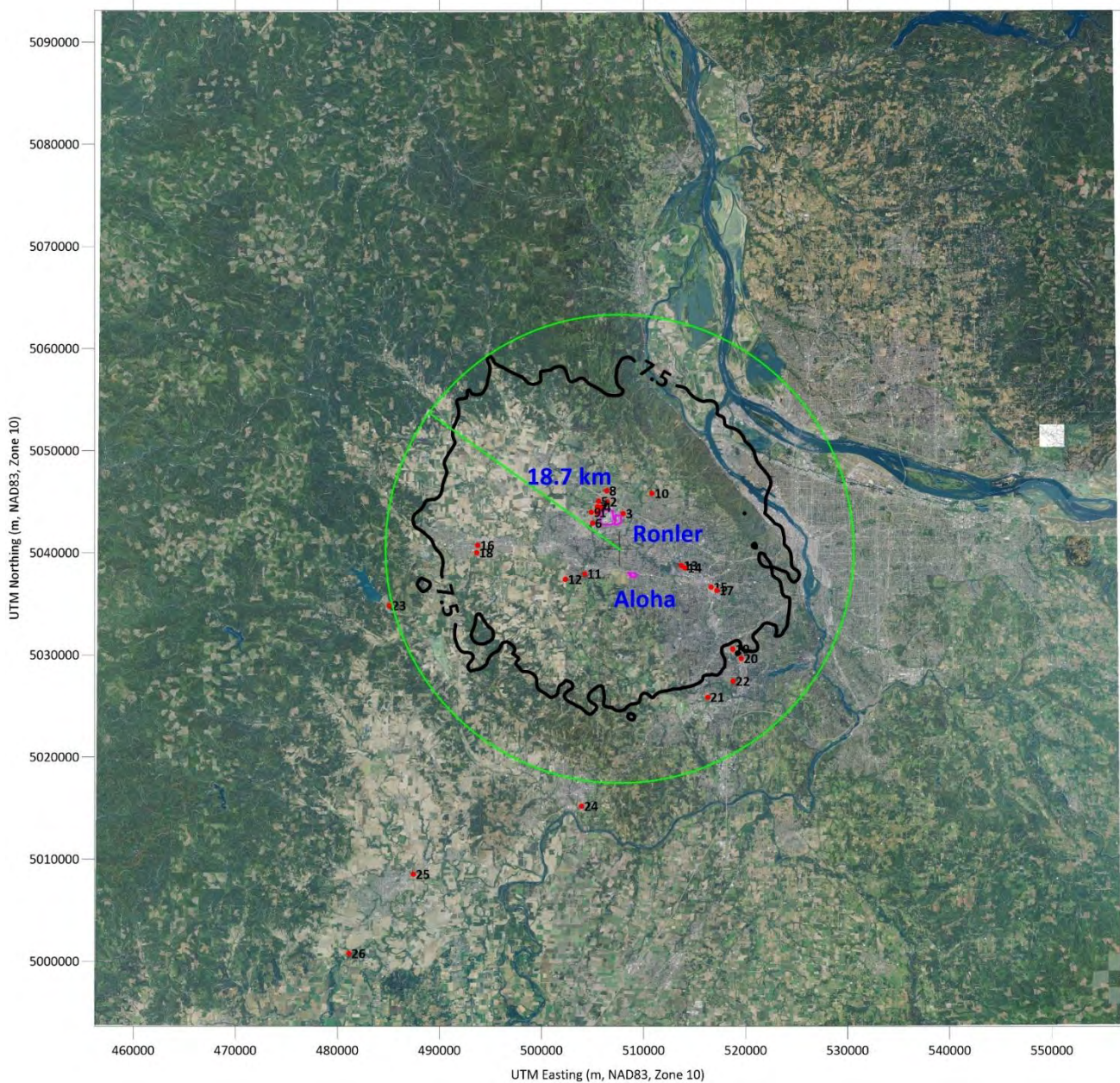


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emissions (PTE) with the total modeled tons provided in Table 21. While increment analyses use actual emissions, the use of PTE is considered conservative and will overestimate the increment consumption in the area.

Figure 12 presents the locations and names of the cumulative sources from Table 21 used in the increment and NAAQS modeling assessments. The 1-hr  $\text{NO}_2$  isopleth of  $7.5 \mu\text{g}/\text{m}^3$  represents the largest SIA with an 18.71 km radius which was used in the figure for reference.

**Figure 12**  
**Cumulative Source Inventory Location**



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Table 22 Modeled NAAQS/Increment Source Emission Points and Stack Parameters											
Permit Number	Model ID	X (m)	Y(m)	Z(m)	H(m)	Temp (K)	Vel (m/s)	Diam (m)	NOX (TPY)	PM-10 (TPY)	PM-2.5 (TPY)
34-2813	CS01x01	505426	5043934	65.21	18.29	422.04	11.28	2.44	1.15	0.00	0.00
34-0241	CS02x01	506473	5044990	63.83	18.29	422.04	11.28	2.44	1.97	0.03	0.03
34-0183	CS03x01	508014	5043820	67.58	18.29	422.04	11.28	2.44	20.90	0.70	0.70
34-2790	CS04x01	505871	5044457	65.68	18.29	422.04	11.28	2.44	1.99	0.00	0.00
34-0222	CS05x01	505596	5045037	60	18.29	422.04	11.28	2.44	2.05	0.00	0.00
34-0055	CS06x01	504995	5042902	56.95	18.29	422.04	11.28	2.44	2.50	0.06	0.06
34-9507	CS07x01	505463	5044497	64.3	18.29	422.04	11.28	2.44	2.62	0.35	0.35
34-0186	CS08x01	506407	5046058	66.99	18.29	422.04	11.28	2.44	21.63	1.50	1.50
34-0235	CS09x01	504885	5043965	65.08	18.29	422.04	11.28	2.44	1.07	0.00	0.00
34-2639	CS10x01	510829	5045802	79.95	18.29	422.04	11.28	2.44	1.11	0.03	0.03
34-2753	CS11x01	504243	5037930	48.41	18.29	422.04	11.28	2.44	42.80	0.87	0.87
34-0004	CS12x01	502344	5037386	56.28	6.10	295.37	2.13	15.24	0.00	3.62	0.46
34-0004	CS12x02	502344	5037386	56.28	18.29	422.04	11.28	2.44	19.12	2.32	2.32
34-2804	CS13x01	513703	5038745	62.28	18.29	422.04	11.28	2.44	1.69	0.17	0.17
34-2638	CS14x01	514063	5038512	59.64	18.29	422.04	11.28	2.44	2.54	0.06	0.06
34-2783	CS15x01	516615	5036641	60.64	18.29	422.04	11.28	2.44	3.40	0.58	0.58
34-2756	CS16x01	493752	5040722	55.09	18.29	422.04	11.28	2.44	0.00	1.87	1.87
34-0009	CS17x01	517194	5036298	67.27	18.29	422.04	11.28	2.44	2.08	0.00	0.00
34-2678	CS18x01	493642	5039988	52.86	18.29	422.04	11.28	2.44	1.70	0.00	0.00
34-9514	CS19x01	518751	5030570	48.41	12.19	295.37	12.19	1.52	1.33	0.00	0.00
34-0007	CS20x01	519559	5029639	70.81	12.19	295.37	12.19	1.52	0.00	4.48	4.48
34-0063	CS21x01	516283	5025853	44.25	18.29	422.04	11.28	2.44	2.97	0.00	0.00
34-2623	CS22x01	518784	5027415	41.71	18.29	422.04	11.28	2.44	29.51	0.00	0.00
34-2066	CS23x01	485113	5034818	65.06	34.99	453.71	11.80	1.71	36.70	0.00	0.00
36-9504	CS24x01	503921	5015168	51.15	18.29	422.04	11.28	2.44	1.16	0.00	0.00
36-9504	CS24x02	503921	5015168	51.15	12.19	295.37	12.19	1.52	0.16	0.00	0.00
36-5034	CS25x01	487440	5008513	45.63	18.29	422.04	11.28	2.44	7.51	0.00	0.00
36-5034	CS25x02	487440	5008513	45.63	12.19	295.37	12.19	1.52	0.76	0.00	0.00
36-5034	CS25x03	487440	5008513	45.63	15.24	322.59	31.70	3.75	115.00	0.00	0.00
36-5034	CS25x04	487440	5008513	45.63	22.86	307.04	3.05	3.75	16.50	0.00	0.00
36-5034	CS25x05	487440	5008513	45.63	22.86	645.54	7.53	1.74	30.90	0.00	0.00
36-0011	CS26x01	481137	5000753	37.27	9.14	611.26	8.38	1.92	11.30	0.00	0.00
36-0011	CS26x02	481137	5000753	37.27	9.75	922.04	7.55	1.52	40.40	0.00	0.00

The results of the increment consumption analysis are presented in Table 23 and demonstrate that the Project will not exceed the allowed PSD increments.



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Table 23 PSD Class II Increment Results			
Pollutant	Avg. Period	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	PSD Class II Increment ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	Annual	13.37	25
PM-10	24-hr (H2H)	8.63	30
	Annual	2.10	17
PM-2.5	24-hr (H2H)	7.25	9
	Annual	1.92	4

H2H = high second high on an annual basis. Increment not to be exceeded more than once per year.  
PM-2.5 includes secondary formation.

While the cumulative source inventory is the same for both the increment and NAAQS analyses, the averaging period for the NAAQS is different than the PSD increment. The results of the cumulative modeling analysis, with all existing and proposed Intel Facility sources combined with the sources listed in Table 22 were then added to the applicable background monitored data to calculate a total cumulative modeled concentration(s). Table 23 presents the multisource NAAQS analysis which demonstrates that the Project will not exceed the applicable ambient air quality standards for any pollutant.

Table 23 Air Quality Impact Results for Cumulative Modeling Analysis – National Ambient Air Quality Standards					
Pollutant	Avg. Period	Modeled Concentration ( $\mu\text{g}/\text{m}^3$ )	Background ( $\mu\text{g}/\text{m}^3$ )	Total ( $\mu\text{g}/\text{m}^3$ )	National Ambient Air Quality Standard ( $\mu\text{g}/\text{m}^3$ )
NO <sub>2</sub>	1-hr 5-yr Avg of 98 <sup>th</sup> %	N/A	--	184.54	188
	Annual	13.37	35.60	48.97	100
PM-10	24-hr H6H	7.8	39.0	46.80	150
	Annual	-	-	-	-
PM-2.5	24-hr 98 <sup>th</sup> %	4.68	20.7	25.39	35
	Annual	1.74	6.6	8.34	12

NO<sub>2</sub> impacts were evaluated using the ARM2 with hourly seasonal background values added consistent with EPA modeling guidelines (so separate modeled and background values not available). Monte Carlo results are not required for multisource NAAQS.  
Secondary PM-2.5 formation from MERPs included in PM-2.5 results.



## Soils and Vegetation

### Regulatory Overview and Background

OAR 340-225-0050 requires that an analysis of the impact to soils and vegetation of significant commercial or recreational value that would occur as a result of the Project be conducted. The regulation indicates that the owner or operator need not provide an analysis of the impact on vegetation having no significant commercial or recreational value. EPA has also requested on past PSD permit applications that the analysis of soils and vegetation impacts be supplemented pursuant to the following Environmental Appeals Board case: *In re: Indeck-Elwood, LLC*; PSD Appeal No. 03-04; PSD Permit No. 197035AAJ (decided September 27, 2006) (“Indeck”). The Indeck case contemplates the need for additional analysis beyond a “screening analysis” with respect to soil and vegetation for a PSD application. Accordingly, the Indeck case was reviewed for applicability to this Project. As an initial matter, key aspects of the Indeck case are not directly applicable. For example, the Project utilizes clean, state-of-the-art, gas-fired sources located within developed city limits, while the Indeck facility is a proposed large-scale coal-fired power plant located approximate to a prairie reserve of national importance.

Although a more rigorous analysis is provided herein, we note that the Project will have substantially lower air quality impacts than would a coal-fired power plant. The key holding of Indeck is that an agency should consider requiring more than a “screening analysis” to evaluate soil and vegetation impacts to the extent that the 1990 New Source Review (NSR) Manual would result in a different significance conclusion. In particular, the Indeck case contemplates an inventory of applicable soils and vegetation and consideration of site-specific effects where appropriate to identify potential impacts. *See, e.g., Indeck*, pp. D.4-5 and D.11-12.

Following the review of Indeck, ADI prepared a soils and vegetation analysis to ensure the analysis reflected the methodology in the 1990 NSR Manual (EPA, 1990). The guidance in the 1990 NSR Manual, Section II.C Soils and Vegetation Analysis, is brief, less than one page long. The key components of the analysis are to develop an inventory of the soils and vegetation types with commercial or recreational value found in the area, and to analyze the impacts from *regulated pollutants* that are proposed to be emitted by the Facility. This requirement only applies to regulated pollutants that are to be emitted from the Facility in *significant amounts*. While an example related to fluorides is provided in Section II.C, an additional example analysis provided in Section III.C of the NSR Manual clearly states “...the sensitivity of the various soils and vegetation types to each of the applicable pollutants that will be emitted by the facility *in significant amounts*.” (pg D.11, emphasis added).

### Extent of the Analysis

The maximum modeled CO 1-hour and 8-hour concentrations for the Project impacts did not exceed the EPA SILs and are thus, not expected to impact any type of plant species. The maximum modeled NO<sub>2</sub> impacts for 1-hour and annual did exceed the EPA SILs with the SIL radius extending outwards to 8.5 km for the annual NO<sub>2</sub> averaging period and 18.7 km for the 1-hour extent. The maximum 1-hour and annual NO<sub>2</sub> impact locations all fell within 150 meters of the Gordon Moore Park at Ronler Acres fenceline. Because pollutant concentrations associated with the Project are highest within the immediate area of the Project and rapidly drops off with distance, the analysis for the SIA provide conservative pollutant concentration values in regard to the regional Project impact. In addition, the SIA includes land use,



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terrain, soil type, and flora that is typical of Washington and Multnomah Counties. The SIA area in Figure 12 and those presented in Attachment C encompasses industrial land, undeveloped land, the Hillsboro airport, agriculture and commercial/light industrial properties.

### Vegetation Types

Several agricultural crops are grown within the vicinity of each of the Project sites. These crops include primarily commercial corn and wheat (summer and winter) production. Agricultural lands are adjacent to the Project sites towards the east, west and south. Agricultural lands extending outwards within the NO<sub>2</sub> SIA also include barley, alfalfa, hops, grapes, blueberries, etc.

Within the defined 1-hour and annual NO<sub>2</sub> SIA, the non-commercial vegetation communities in the immediate surrounding areas can generally be classified as mixed forest, developed land and shrubland. No known federal or state sensitive plant species were identified. No designated critical habitat areas for federally listed species were identified.

The document developed by the U.S. Department of Agriculture (USDA) entitled, *A Screening Procedure to Evaluate Air Pollution Effects in Region 1 Wilderness Areas, 1991* was utilized for this assessment to determine the potential impacts of the modeled NO<sub>2</sub> concentrations. The 1991 document includes plant species specific pollutant concentration thresholds for western U.S. species, as well as other information that complements the 1980 EPA guidance. The two referenced guidance documents have been reviewed to identify the most appropriate threshold values (if available) for this region based upon the species identified that have significant commercial or recreational value.

Although the reference documents do not provide values for all of the identified species or pollutants, they do provide information about the alfalfa and barley field crops which are two of the lesser secondary crops in the vicinity of the Project area. Based upon the information provided in Appendix B in *A Screening Procedure for the Impacts of Air Pollution Sources on Plants, Soils and Animals*, the alfalfa and barley crops were found to be rated as “sensitive” to NO<sub>2</sub>. The “sensitive” rating means that the lowest damage threshold is applied. Based upon this information, the proposed impact analysis was based upon compliance with the threshold levels for “sensitive” vegetation that are identified in Table 3.1 of *A Screening Procedure for the Impacts of Air Pollution Sources on Plants, Soils and Animals*. In that table, the total modeled air concentrations for the proposed Project plus ambient background concentrations are compared to the criteria to evaluate impacts. The total concentrations for both 1-hour and annual NO<sub>2</sub> are well below the significance criteria of 3,760 ug/m<sup>3</sup> and 94 ug/m<sup>3</sup> respectively. Since no thresholds were exceeded, there is no potential for adverse impact on vegetation. This approach uses the most stringent level of damage threshold to assure conservative results, thus additional evaluation of impacts of air pollutants to vegetation is unnecessary.

Attachment D contains a listing of the commercial and non-commercial plant species in the Project area.

### Soil Types

Soils on and around the two Project sites are primarily loams, silt loams, and silty clay loams which include Aloha silt loam, Willamette silt loam, Woodburn silt loam, Amity silt loam, and Verboort silty clay loam. Attachment D contains a complete listing of the soil types found in the vicinity of the Project.



### Nitrogen Deposition

In addition to the ambient pollutant exposure levels, plants have the potential to be affected by intake of air pollutants that have deposited and subsequently accumulated in the soil. Compared to the amount of published information on the effects of atmospheric pollution on plants and animals, relatively little has been reported on their effects on soils. Often the effect on soils can be seen in plants and animals such that the impacts to soil are secondary. For instance, if contaminated soil causes vegetative damage, the result could be increased erosion, increase in solar radiation reaching the ground, higher soil temperature and moisture stress. In agricultural and populated areas, intentional human actions taken to improve soils and assist vegetation growth, such as fertilization and application of insecticides, tend to have a much more direct and profound effect on soils than airborne pollutants. Nitrogen can be added to soil as a result of atmospheric deposition. Nitrogen deposition in soil can have beneficial effects to vegetation if they are currently lacking these elements. At levels above plant requirements, gaseous emission impacts on soils can cause acidic conditions to develop. Soil acidification and eutrophication can occur as a result of atmospheric deposition of nitrogen.

To calculate nitrogen depositional impacts from operation of the Project, the *Near Field Nitrogen Deposition Modeling Guidance (November 2013)* was followed. The primary purpose of any screening analysis is to produce a preliminary or conservative estimate of potential impacts (EPA, 2005). Using non-reactive (no chemistry) dispersion models such as AERMOD to complete a deposition analysis by assuming all NO<sub>x</sub> emissions are converted into depositional nitrogen provides a conservative methodology.

A threshold at which harmful effects from nitrogen deposition on plant communities has not been firmly established. Research conducted in the South San Francisco Bay Area indicates that intensified annual grass invasions can occur in areas with nitrogen deposition levels of 11–20 kg/ha/yr. A Nitric Acid depositional value of 0.05 m/s was applied to the average of the SIA annual NO<sub>2</sub> concentrations, in order to calculate the rate of deposition. The use of 0.05 m/s deposition velocity is consistent with Class I nitrogen deposition analysis. The levels of nitrogen deposition in the area around the Project are estimated at 5.89 kg/ha-yr, far below levels necessary to cause adverse effects.

Furthermore, the level of nitrogen deposition from the Project on plant-available nitrogen would actually be less than the calculated amount because the deposition will be distributed in small amounts during the year and not all of the nitrogen added to the soil during each deposition event is available for plant use because of losses associated with soil processes. Therefore, it is unlikely that there would be significant impacts to biological resources from nitrogen deposition.

### Soil Acidification

As noted above, nitrogen deposition acts as a plant nutrient that can benefit soils, especially soils such as the sandy loam that exists in the Project area. However, this soil amendment can also be detrimental where it benefits non-native plants competing with native vegetation. No sensitive vegetative communities have been identified in the vicinity of Project that would be expected to be negatively impacted by nitrogen deposition.



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## Soil Eutrophication

Eutrophication is an increase in the concentration of chemical nutrients in an ecosystem to an extent that increases the primary productivity of the ecosystem. Atmospheric deposition of nitrogen can facilitate eutrophication of the soil and vegetation community.

A measure of the existing ambient deposition (wet + dry) in the area was obtained from the closest representative monitors in the National Atmospheric Deposition Program (NADP) monitoring network (<https://nadp.slh.wisc.edu/>) at the Columbia River Gorge monitoring site (WA98) in Skamania County, Washington. This monitor is operated by the USFS. The most recent background deposition is based on dry plus wet deposition data 1.894 kg/ha/yr for 2021. Since the Project incremental annual nitrogen is was calculated at 5.89 kg/ha-y, the addition of the background for a total deposition rate of 7.79 kg/ha-yr is still below the threshold needed for adverse effects. Thus, the effects of deposition on eutrophication are considered to be insignificant.

## Class I Impact Assessment

OAR 340-225-0070 requires PSD sources to assess compliance with Air Quality Related Values (AQRVs) if the source could impact visibility or deposition. This requirement is also summarized in EPA's Draft NSR Workshop Manual, where an impact analysis must be performed for any PSD source which "may affect" a Class I area. The AQRV requirement includes any PSD source located within 100 km of a Class I area. However, Class I areas typically within 300 km are included in this type of analysis. OAR 340-225-0700 requires the ODEQ to provide notice of PSD permit applications to the EPA and Federal Land Managers. This notification was completed by the ODEQ and was incorporated into the ODEQ comments on the modeling protocol.

Intel is now a major source for criteria pollutant emissions and is therefore automatically subject to PSD permitting requirements. The nearest Class I area is Mount Hood, located 80 km from the Gordon Moore Park at Ronler Acres (see Figure 13). Eight (8) additional Class I areas are identified within 300 km of the Project. The Class I coordinates are based on the National Park Service (NPS) Class I receptor list converted from latitude/longitude to UTM NAD83 coordinates.

Following OAR 340 division 25 and the FLAG Workshop procedures (June 2010) for PSD sources greater than 50 km from a Class I area, the use of the Screening Procedure Q/D was utilized to determine if the Project could screen out of a formal AQRV assessment for visibility and nitrogen deposition (Q is the total emissions in tons per year and D is the distance in kilometers to the Class I area). Following these procedures in, Q is calculated as the sum (in tons/year) of emissions of NO<sub>x</sub> and PM-10 based on the maximum 24-hour net emissions increase for each pollutant from the proposed Project. The actual baseline emissions were not included in the proposed increase, as per FLAG with ODEQ concurrence. There will be no increase in SO<sub>2</sub> emissions over the existing PSEL so this pollutant was not included in the calculation of Q. The existing PSEL emissions and the proposed hourly increases converted to tons are summarized in Table 24.

The screening calculation takes the form of:

$$Q = \text{sum } (NO_x + PM-10) \text{ in lbs/hr (for 24-hours) for the worst-case day} * 365 \text{ days/year}$$





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Table 24 Existing and Proposed Emissions Profiles			
	<b>NO<sub>x</sub> tpy</b>	<b>PM-10 tpy</b>	<b>Q tons</b>
Current PSEL	197.0	35.0	-
Proposed Increase without Emergency Generators	184.0*	24*	-
Proposed Increase Emergency Generators Only (worst-case day)	124.1*	1.17*	-
Total for Q/D Calculation	308.10	25.17	333.27
Total PTE	403.0	59	
* Based on worst case day multiplied by 365 days and converted to tons per year			

All the non-emergency sources are steady state and operate almost continuously 24-hours per day. The emergency diesel generators are limited to 25 hours per year, with no more than 10 engines being tested during any day. To determine the worst-case daily emissions for the emergency generators, the 10 highest emitting engines' emissions were summed to calculate a pound per day (lb/day) emission rate. This was then multiplied by 365 days and converted to tons per year (tpy) to calculate the engines contribution to the total emissions (Q). As an example, for NO<sub>x</sub>:

Each emergency generators at 68 lb/hr each or 10 engines on a daily basis at 680 lb/day  
 $680 \text{ lb/day} * 365 \text{ day/yr} * 1 \text{ ton}/2000 \text{ lb} = 124.1 \text{ tpy}$

This is repeated for PM-10 but with a different set of 10 engines which have a higher PM-10 emission rate.

Each emergency generators at 0.641 lb/hr each or 10 engines on a daily basis at 6.41 lb/day  
 $6.41 \text{ lb/day} * 365 \text{ day/yr} * 1 \text{ ton}/2000 \text{ lb} = 1.17 \text{ tpy}$

Using this procedure on the emergency generators which is then added to the steady state Q, the total Facility Q based on the increase in NO<sub>x</sub> and PM-10 is:

$Q = \text{sum} (\text{NO}_x + \text{PM-10}) \text{ in maximum lbs/day (for the worst-case day including emergency generators)} * 365 \text{ days/year} * 1 \text{ ton}/2000 \text{ lbs} = 333.27 \text{ tons}$

The results of the Q/D scenarios are presented in Table 25. If Q/D is less than 10, then the AQRV analysis can be waived as a requirement. All of the Class I areas have a Q/D ratio less than threshold of 10. In accordance with OAR 340-225-0070, the Federal Land Managers (FLMs) of Class I areas potentially affected by the project were notified by ODEQ of the pending permit application. In the FLM responses, the U.S Forest Service and the National Park Service, as FLMs, have both stated that an analysis of AQRVs is not required for their respective Class I areas and the Columbia River Gorge National Scenic Area.

In addition to the above AQRV analysis, OAR 340-225-0060 requires Class I SILs modeling to be performed to determine if a Class I increment and NAAQS analyses would be required for the major source pollutants.



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**TABLE 25  
NEARBY CLASS I AREAS AND Q/D SCREENING RESULTS**

Class I Areas	Minimum Distance (km)	Q/D*
Mt Hood OR (MOHO)	80	4.2
Mt Jefferson OR (MOJE)	116	2.9
Mt Adams WA (MOAD)	121	2.8
Goat Rocks WA (GORO)	145	2.3
Mt Washington WA (MOWA)	150	2.2
Mt Rainier WA (MORA)	153	2.2
Three Sisters OR (THSI)	167	2.0
Diamond Creek (DC)	223	1.5
Crater Lake (CR)	279	1.2

\*Q/D based on worst case day.

### **PSD Class I SILs AERMOD Analyses**

OAR 340-225-0060 requires that the Project must demonstrate compliance with the NAAQS and increments in PSD Class I areas. This requirement is only applicable if the Project exceeds the Class I SILs. Therefore, Class I SILs modeling were assessed for the Class I areas listed in Table 25 using the procedures in OAR 340-225-0030 (Procedures) and 340-225-0040 (Air Quality Models). Modeling was performed for the Project emissions only and then compared to the applicable Class I SILs in OAR 340-200-0020. The Class I receptor grid and elevations given by the National Park Service Air Resources Division on the webpage were used:

<http://www.nature.nps.gov/air/Maps/Receptors/index.cfm>

These receptors were converted to UTM NAD83 coordinates by the US Army Corps of Engineers CORPSCON program for Class I areas within 50 km of the Project site(s).

The EPA Modeling Guidelines suggest that the use of AERMOD be limited to distances of less than approximately 50 km, beyond which the CALPUFF dispersion model is typically used to assess the long-range transport of pollutants. Since the requirement to assess AQRVs for each of these areas was waived, an alternative modeling approach with AERMOD was used for assessing Class I SILs for each Class I area that is located at a distance greater than 50 km. The proposed approach utilizes a ring of receptors at 50 km distance from the Project, with receptors placed at two (2) degree intervals over the entire 360-degree circle of receptors. For each of these receptors, the receptor heights were based on a range of elevations that correlate with each of the nine (9) Class I areas listed in Table 25. 100-meter elevation intervals were used starting at the lowest elevation up to the highest. Using this grid, the Class I SILs listed in Table 26 were assessed. If any of the Class I areas have impacts that exceed the SILs, then the CALPUFF modeling will be used to reassess these SILs and, if needed, would also be used to assess PSD Class I area increments and NAAQS. Figure 13 presents the AERMOD receptor grids developed used in the Class I SIL analysis.

Single source impacts on secondary PM-2.5 tend to decrease as distance from the source increases (Baker et al., 2016), which means peak source impacts presented as PM-2.5 in the NAAQS air quality assessment



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may not provide relevant information for the spatial scales involved between Project sources and Class I areas. Given that Project source impacts will be lower at greater distances, the MERPs listed in Table 14 would overestimate the secondary PM-2.5 formation as the source and Class I areas are not in close proximity.

Using the distance correction outlined in the memorandum from EPA dated April 2019, *“Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone (O<sub>3</sub>) and PM<sub>2.5</sub> under the PSD Permitting Program.”*, the hypothetical source concentrations from MERPs View Qlik were selected based on the distance to the nearest Class I area, Mount Hood, at 80 km. Using the Morrow, Oregon site, this produced the following secondary PM-2.5 formations based on the modeled hypothetical source and resultant MERP concentration from the MERP View Qlik output:

- 24-hr = 0.0903 ug/m<sup>3</sup>
- Annual = 0.0039 ug/m<sup>3</sup>

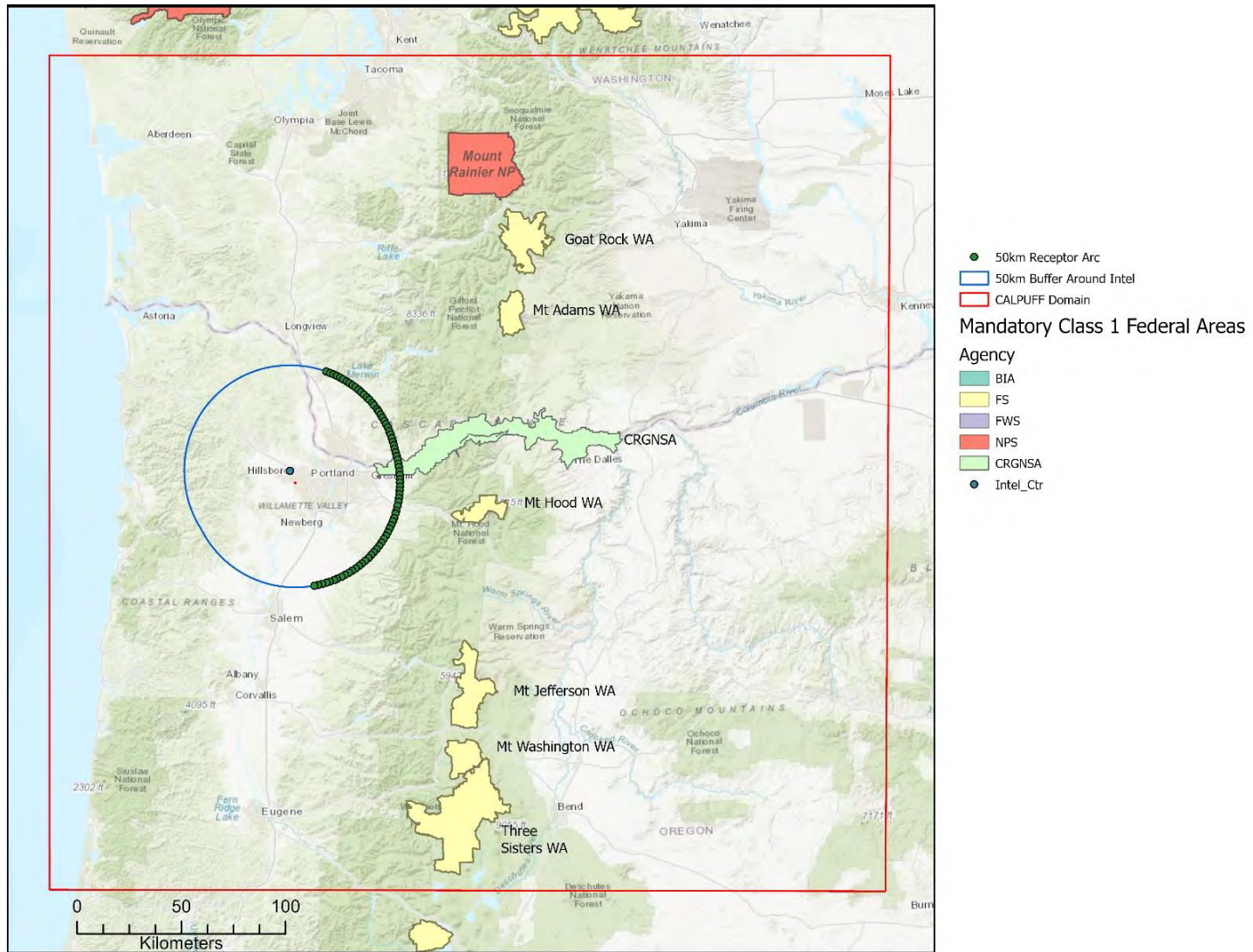
Attachment C contains the MERP View Qlik distance dependent concentrations for the 80 km distance. These were added to the Class I SIL modeling results for comparisons with the Class I SILs. Additional distance dependent MERP analyses were not made as the closest Class I area used in the analysis would be considered conservative.

Using the Class I modeling grid, the Class I SILs were assessed with the maximum results listed in Table 26. These are the maximum 24-hour and annual impacts over the 5-years modeled at all of the receptors. The results of the Class I SIL analysis demonstrate that all modeled impacts, including secondary PM-2.5 formation, will be less than the applicable Class I SIL. Thus, no Class I increment, or NAAQS analysis is required at any of the areas.



# AIR QUALITY IMPACT ASSESSMENT

**Figure 13**  
**Class I Areas and the AERMOD Receptors**



## AIR QUALITY IMPACT ASSESSMENT

TABLE 26 Criteria Pollutant Class I SILs and Increments				
Pollutant	Averaging Interval	Maximum Modeled Impact on Receptor Ring (50 km) ( $\mu\text{g}/\text{m}^3$ )	Class I Significant Impact Level ( $\mu\text{g}/\text{m}^3$ )	Class I PSD Increment ( $\mu\text{g}/\text{m}^3$ )
<b>NO<sub>2</sub></b>	Annual	0.00308	0.1	2.5
<b>PM-10</b>	24-Hour	0.0619	0.3	25
	Annual	0.0062	0.2	5
<b>PM-2.5</b>	24-Hour	0.128	0.27	2
	Annual	0.009	0.05	1

Secondary PM-2.5 were added to the primary PM-2.5 modeled concentrations.

### **Conclusion**

In summary, the dispersion modeling assessment used all the existing and new source emissions in the SILs, PSD increment and NAAQS analyses. Based on these modeling results which utilized the data presented in this Air Quality Impact Assessment, the project will comply with all NAAQS and PSD increments and will not cause or contribute to exceedances of any ambient standard or limit. The applicable requirements of OAR 340 divisions 224 and 225 addressed herein have been completed.



# Attachment A

## ODEQ Modeling Protocol and Approval Letter



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*ODEQ Air Contaminant Discharge Permit  
Application*

**Air Quality Modeling Protocol**

**Intel Corporation Ronler  
Acres/Aloha Project**



Submitted to  
**Oregon Department of Environmental Quality**

Submitted by



**ATMOSPHERIC DYNAMICS, INC**  
Meteorological & Air Quality Modeling

Prepared by  
**Atmospheric Dynamics, Inc.**

April 2023

# AIR QUALITY MODELING PROTOCOL

## INTRODUCTION AND PROJECT DESCRIPTION

Intel Corporation (Intel) operates the Ronler Acres and Aloha semiconductor manufacturing facilities (Facility) in Washington County, Oregon. The Ronler Acres campus is located at 2501 NE Century Boulevard, Hillsboro, Oregon, which has a Universal Transverse Mercator (UTM) North American Datum (NAD) 83 coordinate of 506601.5 meters Easting, 5043404.5 meters Northing (Zone 10). The Aloha campus is located at 3585 SW 198th Avenue, Aloha Oregon, and has a UTM NAD 83 coordinate of 509003.2 meters Easting, 5037811.5 meters Northing (Zone 10) latitude /longitude of 122.8851359° W, 45.4937841° N. The Aloha campus has been operating since 1976 while the Ronler Acres campus began operation in 1994. Both campuses are engaged in the production of semiconductor products and are considered co-located for permitting purposes because their production activities are interrelated. Both campuses are regulated under a single Standard Air Contaminant Discharge Permit (ACDP), 34-2681-SI-02, issued by the Oregon Department of Environmental Quality (DEQ) in 2016 and most recently modified in 2022.

Intel is submitting a Type 4 Maintenance Area New Source Review (NSR) and Prevention of Significant Deterioration (PSD) permit application due to proposed changes at the Facility meeting the definition of “major modification” in OAR 340-224-0025. Changes at the Facility include additional fabrication (fab) cleanroom space (D1X MOD4 and D1A expansion), and increased emissions at the existing fabs due to advances in technology manufacturing and additional manufacturing support operations. The proposed major modification will trigger the Maintenance Area NSR requirements in OAR 340-224-0060 and the Prevention of Significant Deterioration (PSD) requirements in OAR 340-224-0070. A common requirement of both sets of requirements is the need to demonstrate that the proposed changes will not cause or contribute to an exceedance of the National Ambient Air Quality Standards. Modifications subject to Division 224 requirements must be permitted as Type 4 construction approvals.

This modeling protocol describes the Class I and Class II modeling steps, methods and assumptions that will be performed to support the Type 4 construction approval permit application. The modeling will be based on the ODEQ *“Recommended Procedures for Air Quality Dispersion Modeling”* (March 2022). Table 1 summarizes the proposed analyses on a pollutant specific basis. The modeling will follow procedures as summarized by the United States Environmental Protection Agency (EPA) Appendix W modeling guidelines. Additional guidance procedures are summarized below and throughout the text: U.S. Environmental Protection Agency (EPA) in its *“Guideline on Air Quality Models”* (including supplements), EPA Memorandum *“Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> National Ambient Air Quality Standard”* (March 2011), EPA Memorandum *“Clarification on the Use of AERMOD Dispersion Modeling for Demonstrating Compliance with the NO<sub>2</sub> NAAQS”* (September 2014) “ EPA Memorandum *“Guidance for Ozone and Fine Particulate Matter Permit Modeling”* (July 2022), EPA Memorandum *“Modeling Procedures for Demonstrating Compliance with PM<sub>2.5</sub> NAAQS (March 2010) and the California Air Pollution Control Officers Association (CAPCOA) “Modeling Compliance of the Federal 1-Hour NO<sub>2</sub> NAAQS”*(October 2011).





# AIR QUALITY MODELING PROTOCOL

**TABLE 1  
AIR QUALITY CRITERIA**

	NO <sub>x</sub>	PM10	PM2.5	CO	SO <sub>2</sub>
<b>PSD Significant Impact Levels for Class I And Class II Areas</b>	x	x	x	x	
<b>Ambient Air Quality Standards</b>	x	x	x	x	x
<b>Class I and Class II Visibility and Deposition</b>	x	x	x		
<b>Impacts to Soils and Vegetation</b>	x	x	x	x	
<b>Class I and Class II Area Increment</b>	x	x	x		

The project will also be major for VOCs and will include an analysis of ozone impacts from emissions of NO<sub>x</sub> and VOCs. Secondary PM2.5 and Ozone will also be assessed with MERPS.

## Permit Applicability

The locations of the Ronler Acres and Aloha campuses are shown in Figure 1. The site plans are presented in Figures 2 and 3, respectively. The Ronler Acres and Aloha campuses are located in Washington County, Oregon. The area in which the campuses are located is designated as attainment or unclassified for all criteria pollutants except carbon monoxide (CO) and ozone, for which the area is designated as maintenance.

The current Facility is an existing source that will become a Federal Major Source as a result of the proposed changes because emissions of one or more regulated pollutants will increase above the Federal Major Source level. A major modification at a facility that will become a Federal Major Source triggers the requirements of Oregon’s PSD permitting program for each pollutant for which the area is designated attainment or unclassified. OAR 340-224-0070(3)(a)(A). These requirements include the obligation to conduct an air quality analysis for each regulated pollutant for which emissions will exceed the netting basis by a Significant Emission Rate (SER) or more. Based on the proposed Plant Site Emission Limits, the Facility is required to perform a PSD air quality analysis for NO<sub>x</sub>, PM10 and PM2.5.

The proposed modifications also trigger requirements of Oregon’s Maintenance Area New Source Review (NSR) program because it is located within the Oregon portion of the Portland-Vancouver Interstate Maintenance Area for ozone and the Portland Maintenance Area for CO, and the proposal constitutes a major modification for CO and ozone precursors (VOC and NO<sub>x</sub>). Maintenance area NSR requirements are triggered for each major modification of a maintenance pollutant. Major modifications for ozone precursors (NO<sub>x</sub> and VOC) constitute major modifications for ozone. A major modification of a maintenance pollutant must comply with the maintenance area NSR requirements at OAR 340-224-0060, including the requirement to demonstrate that it will not cause or contribute to an exceedance of the NAAQS. The Facility will meet its NAAQS compliance obligation in part by ensuring a net air quality benefit in compliance with OAR 340-224-0060(2) by fully offsetting its CO, NO<sub>x</sub> and VOC emissions via an allocation of growth allowance. In addition, the Facility will model its CO emissions and evaluate ozone impacts independent of the net air quality benefit resulting from offsetting those emissions.



## AIR QUALITY MODELING PROTOCOL

Oregon DEQ is requiring sources<sup>1</sup> to demonstrate compliance with the short-term NAAQS (specifically, 24-hr PM<sub>2.5</sub>, 1-hr SO<sub>2</sub> and 1-hr NO<sub>2</sub>) if the facility's project triggers NSR for any pollutant and the facility-wide short-term emissions are greater than the Significant Emission Threshold (SETs). Intel will be conducting a short-term NAAQS evaluation for NO<sub>2</sub> and PM<sub>2.5</sub> as required by the PSD & Maintenance Area NSR regulations described above. Although the project SO<sub>2</sub> emissions do not require an air quality assessment under the PSD regulations, the short-term facility wide SO<sub>2</sub> emissions will be over the SO<sub>2</sub> significant emissions threshold (SET) of three (3) pounds per hour (lbs/hr) and SO<sub>2</sub> NAAQS compliance will be evaluated.

### Project Description

The manufacturing process occurs in a cleanroom environment to avoid micro contamination of the product. Semiconductors are fabricated in batches of silicon wafers and can take anywhere from one to two months to manufacture. Semiconductor manufacturing begins with a silicon wafer substrate. The semiconductor is then built up as a series of layers, with material added or removed in each step. Steps include:

- Oxidation: Involves the generation of a silicon dioxide layer on the wafer surface to provide a base for the photolithography process. This layer also insulates and protects the wafer during subsequent processing.
- Lithography: Starts with the application of a photo sensitive layer onto the wafer. Then, a photomask is placed over the wafer and light is projected onto the wafer to form patterns of exposed and unexposed photoresist (e.g., the electrical pattern). After exposure, the wafer is developed in a solution that dissolves the exposed photoresist, leaving those areas exposed for subsequent processing steps. The unexposed photo-resistant coating remains on the wafer, thus protecting the surface.
- Ion Implant: Doping the wafer with ions to making it conductive or insulating at selected locations.
- Etching: Wet or dry etching techniques are used to remove unwanted material on certain areas on the wafer. After etching, photoresist is removed using dry or liquid stripping compounds.
- Deposition: Applies additional layers of silicon, silicon dioxide, or other materials to the wafer
- Planar: A surface treatment process which prepares the wafer for subsequent processing steps. A mildly corrosive chemical slurry is used as a polishing compound.

During the fabrication process, many of these steps are repeated multiple times in various sequences with variations in each step. Once the manufacturing is completed, the wafers are tested and cut into individual chips. The semiconductor chips are then sorted, assembled, tested, and packaged.

Manufacturing operations occur 24 hours a day and 365 days a year. However, production output varies with consumer demand and stage of process development. Significant technology revisions occur approximately every 2 years.

There are a number of utility support systems that support fab manufacturing operations. These include:

- Natural gas-fired rotor concentrator thermal oxidizers (RCTOs) are used to control volatile organic compounds (VOC) emissions from the Fabs.

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<sup>1</sup> See Oregon DEQ, "Short-Term NAAQS Compliance Internal Management Directive" signed September 1, 2021 and Oregon DEQ, "Recommended Procedures for Air Quality Dispersion Modeling", March 2022.



## AIR QUALITY MODELING PROTOCOL

- Packed-Bed Wet Chemical Scrubbers for controlling acid gases used in the Fab.
- Trimix Ammonia Treatment Systems are used to treat ammonia wastewater.
- Large natural gas-fired boilers (>2.0 million BTU per hour)
- Small natural gas-fired heating units and boilers (<2.0 million BTU per hour)
- Diesel-fired emergency generators and fire pumps
- Wet cell cooling towers
- Bulk Chemical Distribution including bulk and specialty gases.

Below is a summary description of the emission points that will be used in the modeling analyses.

### *Rotor Concentrator Thermal Oxidizers (RCTOs)*

RCTOs consist of two main components: a concentrator that uses zeolite wheels to adsorb VOCs from the Fab exhaust and a thermal oxidizer that oxidizes the VOCs into water and carbon dioxide. The RCTOs are a source of natural gas combustion byproducts, CO<sub>2</sub>, and VOCs that are not adsorbed by the zeolite concentrator. Each RCTO stack will be included in the model as a point source.

Some of the newer RCTOs exhaust to the acid scrubbers that then pass through a wet electrostatic precipitator (WESP) for additional PM control. A WESP works by charging particles as they enter the unit and collecting them on electrodes within the WESP body.

### *Packed-Bed Wet Chemical Scrubbers (Scrubbers)*

Each Fab has several scrubbers that treat acid or ammonia-containing Fab process exhaust. The exhaust passes through a packed bed with reagent flowing through the bed. A substantial portion of the acid or ammonia gases in the exhaust are transferred out of the air stream into the reagent stream. The treated exhaust streams are then sent out to the atmosphere via a manifold with between one and five stacks.

### *Boilers*

The boilers supply hot water to the various buildings and manufacturing processes. All of Intel's boilers are natural gas fired. Air emissions from the boilers are those associated with natural gas combustion.

### *Emergency Generators and Fire Pumps*

In addition to backing up all critical Life Safety Systems, emergency generators back-up systems required by code and business continuity needs at the Facility in the event of an unplanned primary power outage. The generators combust ultra-low-sulfur diesel and are routinely tested to ensure proper operation. For permitting purposes, air emissions are limited to periods when the emergency equipment is tested and maintained. Readiness testing is limited to 25 hours per year for the emergency generators and 50 hours per year for the emergency fire pumps. The permit specifies that no more than ten generators may be run in a day and the generators can only be run during daylight hours, which is defined as the hours between 8 am and 6 pm.

### *Ammonia Treatment System (TMXW)*

The TMXW system is an ammonia wastewater treatment system that includes gas-phase ammonia abatement. Ammonia wastewater is pH adjusted and fed to an ammonia stripper. The ammonia stripper is a desorption process that removes ammonium ions out of the water to produce gas-phase ammonia. The gas-phase ammonia is exhausted to a two-stage thermal catalytic oxidation/reduction system. The first catalyst converts ammonia to NO<sub>x</sub> and CO to carbon dioxide. The second catalyst converts NO<sub>x</sub> to



## AIR QUALITY MODELING PROTOCOL

nitrogen and water. Air emissions from this system include natural gas combustion byproducts and ammonia. The air emissions exit to ambient air via a stack. Each emission point will be modeled separately.

### *Lime Silos*

Dry lime (calcium hydroxide) used in wastewater treatment operations is delivered to and stored in lime silos. There are five lime silos on site. During filling, the silos are a source of PM emissions as air is displaced by the lime being loaded. Each silo is equipped with a vent controlled by a fabric filter dust collector. For the five lime silo bin vents, PM10 and PM2.5 emissions from all five sources will be modeled as a single volume source that will be located midpoint between the existing lime silo bin vents.

### *Cooling Towers*

The Facility has mechanically-induced (i.e., fan-driven) wet-cell cooling towers that are open to the atmosphere. The cooling towers are used to dissipate the large heat loads generated by the factory and the chilled water is used to condition the incoming air to the correct temperature required by the factory. The cooling towers are a source of particulate matter. Cooling towers will be modeled in two specific ways:

1. Cooling towers with a single fan will be modeled using one stack located in the fan center and the maximum design flow and actual fan diameter will be used for the stack parameters.
2. Multiple fans that are part of a single cooling tower assembly will be modeled using a single stack located in the center of the assembly. The maximum design flow from the cooling tower assembly will be divided by the number of fans to get the representative flow. The diameter for the representative stack will be the diameter of a single fan.

## **PROPOSED AIR QUALITY DISPERSION MODELS**

**Air Quality Models/Version:** The primary EPA dispersion model proposed for use is the AERMOD modeling system (AERMOD version 22112) with the associated meteorological and receptor processing programs AERSURFACE (version 20060), AERMET (version 22112), AERMINUTE (version 15272), and AERMAP (version 18081). AERMOD will be used to quantify pollutant impacts on the surrounding environment based on the emission sources operating parameters and their locations and will be used for modeling most facility operational impacts in both simple and complex terrain. In addition, the Building Profile Input Program for PRIME (BPIP-PRIME version 04274) will be used for determining building dimensions for downwash calculations in AERMOD. These models, along with options for their use and how they are used, are discussed below. These models will be used for the following:

- Comparison of facility impacts to significant impact levels (SILs), Significant Monitoring Concentrations (SMCs), and the National Ambient Air Quality Standards (NAAQS) and
- Cumulative impacts analyses in accordance with EPA modeling requirements, if required (project impacts greater than SILs), for NAAQS and PSD Class I and Class II increments.

## **EXISTING METEOROLOGICAL AND AIR QUALITY DATA**

Hourly observations of certain meteorological parameters are used to define the area's dispersion characteristics. This data is used in EPA approved air dispersion models for defining a project's impact on air quality. These data must meet certain criteria established by the EPA and the following discussion details the proposed data and its applicability to this project.



## AIR QUALITY MODELING PROTOCOL

**Project Location/Topography:** Both the Ronler Acres and Aloha project sites are located in the Tualatin Valley which is a relatively flat river bottom area that is surrounded by terrain to the north, west and east. Very little variation in terrain exists in the valley until the area abuts the mountain ranges surrounding it on three sides.

**Nearby Surface Meteorological Stations:** The proposed Ronler Acres project is located in the northeastern portion of the Tualatin Valley, approximately 2.25 kilometers (km) east of the Hillsboro Airport. The Aloha site is located approximately 6.5 km southeast of the Hillsboro Airport. The Hillsboro Airport (WBAN 94261) collects ASOS (Automated Surface Observing System) surface meteorological data such as wind speed and direction, temperature, pressure, cloud heights, and sky cover. ASOS surface meteorological data are generally selected for processing for AERMOD because ASOS hourly data are routinely recorded and archived, generally meet EPA data completeness criteria, instruments are located in unobstructed areas meeting EPA siting criteria, and instrument heights and sensor sensitivities meet EPA instrument specifications. Also, short-term (1-minute) wind direction and speed data are generally available that can be processed by EPA programs to eliminate excessive calm observations and to give hourly averages consistent with EPA modeling requirements. The ASOS surface data, when processed with AERMET as described below, result in data recovery greater than 90 percent for every quarter in the five-year period in accordance with EPA requirements *“Meteorological Monitoring Guidance for Regulatory Modeling Applications,”* (EPA-454/R-99-005). Generally, surface data parameters of wind speed, wind direction, and temperature must individually exceed 90% both by quarter and year, as well as wind speed, direction, and stability (turbulence) parameters combined, before any substitutions. These criteria are equaled for all quarterly/annual periods of the surface data selected for use, which covers the years 2016 through 2020.

**Selection of Surface Meteorological Data:** As noted above, the project vicinity and immediate areas of Tualatin Valley are relatively flat, an important consideration in the selection of surface meteorological data for use in assessing the projects impacts on regional air quality. Under these circumstances (large expanses of relatively flat terrain), the nearest meteorological data meeting EPA siting and instrument criteria would be expected to be the most representative of the project location. The ASOS data fulfills both criteria, being located in the immediate project vicinity and meeting EPA siting and instrument criteria. Thus, the Hillsboro Airport ASOS data are proposed as the surface meteorological data for modeling facility emissions. The close proximity of the ASOS station to the project site virtually assures that it could be considered representative, if not the equivalent of onsite data.

Both the ASOS and Ronler Acres/Aloha sites are located in the relatively flat Tualatin Valley at nearly identical distances and orientations from the relatively distant mountains which define the valley boundaries. There are no intervening terrain features between the ASOS location and project site to adversely affect the relative synoptic-scale wind patterns at either location (compared to each other). The current ASOS location from the NCDC Historical Observing Metadata Repository (HOMR) was verified and then refined to its exact location based on Google Earth photos (location is shown below).

**Selection of Upper Air Meteorological Data:** The most representative radiosonde observations nearest to the project site is the Salem Airport (McNary Field), located approximately 65 km south of the Intel project sites. Climatologically, Salem is similar to the Intel project sites. Twice daily radiosonde data were available for the proposed modeled years of 2016 through 2020.

**Meteorological Data Surface Characteristics:** AERMET requires input summaries of the surface characteristics for the area surrounding the Hillsboro ASOS monitoring site. These surface characteristics



## AIR QUALITY MODELING PROTOCOL

were calculated with the EPA-program AERSURFACE program based on EPA guidance. AERSURFACE uses 2016 National Land Cover Data (NLCD) from the United States Geological Survey (USGS) to determine land use based on standardized land cover categories. AERSURFACE was executed in accordance with the EPA guidance documents “*AERMOD Implementation Guide*,” (March 19, 2009), and “*AERSURFACE User’s Guide*,” (EPA-454/B-20-008, revised February 2020). AERSURFACE determines the midday albedo, daytime Bowen ratio, and surface roughness length representative of the surface meteorological station. The **Bowen ratio** is based on a simple unweighted geometric mean while **albedo** is based on a simple unweighted arithmetic mean for the 10x10 km square area centered on the selected location (i.e., no direction or distance dependence for either parameter). **Surface roughness length** is based on an inverse distance-weighted geometric mean for upwind distances up to the EPA-recommended one (1) km radius from the selected location. The circular surface roughness length area (1-km radius) can be divided into any number of sectors as appropriate (EPA guidance recommends that no sector be less than 30° in width).

Twelve 30° sectors were processed to calculate the roughness lengths due to the homogeneity of the area within the EPA-recommended radius of one (1) km. Months were assigned to seasons as follows:

- Late autumn after frost and harvest, or winter with no snow: December, January, February
- Transitional spring (partial green coverage, short annuals): March-June
- Midsummer with lush vegetation: July-August
- Autumn with unharvested cropland: September-November

Temporal variations of monthly precipitation must be considered to calculate the albedo for AERMET processing in accordance with EPA recommendations. Precipitation data should be measured at the nearest representative location to the surface data with the most complete precipitation record, particularly for the years of meteorology being modeled. Historical precipitation data are measured in the Hillsboro area (at Hillsboro Airport) and the monthly periods between 1991 to 2020 were used as input AERSURFACE and are presented in Table 2.

**Site Urban/Rural Classification:** Land use surrounding the Intel sites must be determined in order to assess if rural or urban dispersion characteristics should be used. Following Auer (1977) and as summarized in the EPA’s “*Guideline on Air Quality Models*”, if the land use within an area circumscribed by a three (3) km radius around each facility is industrial, commercial, or developed residential, then these areas are designated as urban. All other types of land use are considered rural.



## AIR QUALITY MODELING PROTOCOL

Table 2 Hillsboro Airport 30-year Precipitation Climatology Summary														
Year	JAN	FEB	MAR	APR	MAY	JUN	JUL	AUG	SEP	OCT	NOV	DEC	ANN	SMC
1991	3.01	3.84	3.67	4.88	2.34	1.7	0.25	0.65	0.39	1.66	5.66	4.76	32.81	
1992	4.65	3.7	1.17	4.06	0.13	0.36	0.77	0.31	1.21	2.47	4.54	6.44	29.81	
1993	4.27	0.87	3.77	5.03	3.52	2.68	1.49	0.16	0	1.08	1.26	7.54	31.67	
1994	4.42	5.06	2.85	1.18	1.15	0.94	0	0.42	0.6	6.48	6.32	6	35.42	
1995	8.63	3.47	5.37	3.96	1.35	1.8	0.98	0.39	1.57	2.91	8.32	7.82	46.57	
1996	7.56	10.23	2.93	4.63	4.34	0.97	0.58	0.13	2.96	4.22	9.21	14.83	62.59	
1997	7.67	2.03	6.33	2.18	2.01	2.07	0.73	1.59	3.15	5.45	5.91	3.34	42.46	
1998	8.36	6.64	4.07	1.3	4.77	1.41	0.32	0	0.87	6.4	9.03	7.07	50.24	
1999	7.48	9.78	4.29	1.5	1.74	1.55	0.66	0.84	0.14	2.49	6.91	3.91	41.29	
2000	6.92	4.35	3.02	1.36	1.91	1.04	0.08	0.75	1.27	3	2.16	3.24	29.1	
2001	1.94	1.58	2.33	1.86	0.85	1.2	0.45	0.79	0.79	3.13	8.54	6.98	30.44	
2002	7.31	3.13	3.49	1.71	1.44	1.3	0.32	0.05	0.83	0.43	2.61	9.88	32.5	
2003	8.29	2.93	5.16	5.91	0.75	0.15	0	0.55	0.94	3.07	4.43	7.93	40.11	
2004	5.9	4.27	1.68	1.79	1.24	0.82	0	2.31	1.37	3.55	2.61	3.72	29.26	
2005	2.27	0.68	4.42	2.56	4.35	1.55	0.24	0.32	1.36	3.68	6.09	9.09	36.61	
2006	11.9	1.99	3.57	2.02	2.7	1.08	0.14	0.08	0.59	0.9	12.88	7.49	45.34	
2007	3.24	3.8	2.39	1.96	1.29	0.97	0.4	0.53	1.73	3.12	3.9	8.94	32.27	
2008	5.38	1.49	3.31	1.94	0.97	0.36	0.09	1.37	0.22	1.69	4.51	7.57	28.9	
2009	4.36	1.08	2.4	1.24	2.92	1.34	0.13	0.72	1.51	3.32	5.72	3.96	28.7	
2010	5.14	4.06	3.76	3.22	3.16	3.52	0.45	0.17	2.21	3.98	5.23	8.16	43.06	
2011	3.59	3.83	5.39	3.42	4.68	0.59	1.23	0	0.26	1.88	5.38	2.33	32.58	
2012	5.79	2.48	6.59	2.38	2.34	2.42	0.09	0.02	0.04	5.45	7.59	7.5	42.69	
2013	1.47	1.87	1.81	2.33	3.98	1.31	0	0.85	6.27	0.87	2.73	1.08	24.57	
2014	2.41	5.06	6.07	3.42	1.7	0.92	0.52	0.14	1.1	6.12	2.83	5.88	36.17	
2015	3.01	4.57	4.68	1.41	0.44	0.54	0.32	0.55	0.86	3.42	4	14.6	38.4	
2016	<b>7.53</b>	<b>3.96</b>	<b>5.31</b>	<b>1.88</b>	<b>0.8</b>	<b>1.33</b>	<b>0.33</b>	<b>0.25</b>	<b>0.93</b>	<b>8.66</b>	<b>6.25</b>	<b>4.77</b>	<b>42.0</b>	<b>Wet</b>
2017	<b>4.11</b>	<b>10.06</b>	<b>6.96</b>	<b>3.56</b>	<b>1.82</b>	<b>1.05</b>	<b>0</b>	<b>0.13</b>	<b>1.39</b>	<b>4.04</b>	<b>7.38</b>	<b>2.92</b>	<b>43.42</b>	<b>Wet</b>
2018	<b>5.17</b>	<b>2.15</b>	<b>2.79</b>	<b>3.32</b>	<b>0.11</b>	<b>0.65</b>	<b>0</b>	<b>0</b>	<b>0.79</b>	<b>3.33</b>	<b>2.61</b>	<b>4.74</b>	<b>25.66</b>	<b>Dry</b>
2019	<b>3.12</b>	<b>4.96</b>	<b>1.36</b>	<b>3.23</b>	<b>1.45</b>	<b>0.64</b>	<b>0.49</b>	<b>0.21</b>	<b>3.08</b>	<b>1.51</b>	<b>1.16</b>	<b>5.22</b>	<b>26.43</b>	<b>Dry</b>
2020	<b>7.18</b>	<b>1.49</b>	<b>2.12</b>	<b>0.88</b>	<b>1.86</b>	<b>2.04</b>	<b>0.07</b>	<b>0.25</b>	<b>1.28</b>	<b>1.38</b>	<b>5.34</b>	<b>5.27</b>	<b>29.16</b>	<b>Dry</b>

Sorted Data - The 30-years of climatology were SORTED to determine DRY/AVG/WET months. Generally, the driest and wettest years were used to delineate DRY/WET (AVG was anything in-between). Years which had precipitation less than the 30<sup>th</sup> percentile were designated dry, years which had precipitation greater than the 70<sup>th</sup> percentile were designated wet and all other years were designated as average.

The most objective approach is to use the 2016 land cover classification data (the same data set as used in AERSURFACE) and designate the “Developed Intensity” areas (IDs 22, 23 & 24) as urban based on Auer’s classification. These classes are:

- Developed, Low Intensity (NLDC Code 22) - areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 20 to 49 percent of total cover. These areas most commonly include single-family housing units.
- Developed, Medium Intensity (NLCD Code 23) – This classification includes areas with a mixture of constructed materials and vegetation. Impervious surfaces account for 50 to 79 percent of the total cover.
- Developed, High Intensity (NLCD Code 24) – This classification includes highly developed areas where people reside or work in high numbers. Examples include apartment complexes, row



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houses and commercial/industrial. Impervious surfaces account for 80 to 100 percent of the total cover.

Table 3 and Figure 4 shows the land use determination for the Aloha and Ronler sites. Both sites are over 70 percent urban. Because the area within 3 km is more than 50 percent classified as urban land use, the URBAN option will be used for AERMOD modeling of the Facility and the urban population of the modeling domain should be used within the model as well. Typically, the population value should be equal to the population of the counties contained within the modeling domain. The modeling domain includes receptors in Washington, Clackamas, Yamhill, and Multnomah counties. Since the grid does not cover the complete area of each of these counties, only the populations of Washington, Clackamas, and Multnomah counties were considered. Using the latest U.S. Census Bureau estimates of population (2020), the total population for these three counties is 1.8 million; this population will be input to AERMOD for use in the urban modeling of the Facility.

<b>Table 3 Land Use Summaries</b>						
<b>ID</b>	<b>Description</b>	<b>Class</b>	<b>Ronler</b>	<b>Percent</b>	<b>Aloha</b>	<b>Percent</b>
11	Open Water:	Rural	16	0.1%	3	0.0%
21	Developed, Open Space:	Rural	2892	9.2%	1895	6.0%
22	Developed, Low Intensity:	Urban	6287	20.0%	8781	27.9%
23	Developed, Medium Intensity:	Urban	9523	30.3%	12530	39.9%
24	Developed, High Intensity:	Urban	6855	21.8%	2673	8.5%
31	Barren Land (Rock/Sand/Clay):	Rural	21	0.1%	0	0.0%
41	Deciduous Forest:	Rural	0	0.0%	73	0.2%
42	Evergreen Forest:	Rural	86	0.3%	500	1.6%
43	Mixed Forest:	Rural	35	0.1%	56	0.2%
52	Shrub/Scrub:	Rural	14	0.0%	4	0.0%
71	Grasslands/Herbaceous:	Rural	105	0.3%	95	0.3%
81	Pasture/Hay:	Rural	1825	5.8%	1801	5.7%
82	Cultivated Crops:	Rural	3203	10.2%	2207	7.0%
90	Woody Wetlands:	Rural	339	1.1%	518	1.6%
95	Emergent Herbaceous Wetland:	Rural	222	0.7%	282	0.9%
	<b>Total:</b>		<b>31423</b>		<b>31418</b>	
	<b>Percent Urban</b>			<b>72%</b>		<b>76%</b>
	<b>Percent Rural</b>			<b>28%</b>		<b>24%</b>

**Meteorological Data Representativeness:** The proposed use of the five (5) years of Hillsboro Airport ASOS surface meteorological data would satisfy the need for site-specific data. EPA defines the term “site-specific data” to mean data that would be representative of atmospheric dispersion conditions at the source and at locations where the source may have a significant impact on air quality. Specifically, the meteorological data requirement originates from the Clean Air Act in Section 165(e)(1), which requires an analysis “of the ambient air quality at the facility and in areas which may be affected by emissions from such facility for each pollutant subject to regulation under [the Act] which will be emitted from such facility.” This requirement and EPA’s guidance on the use of site-specific data are also discussed in Section 8.4.4 of Appendix W to 40 CFR Part 51. The representativeness of meteorological data is dependent upon a determination that the data are free from inappropriate local or microscale influences.: (a) the proximity





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of the meteorological monitoring site to the area under consideration; (b) the complexity of the topography of the area; (c) the exposure of the meteorological sensors; and (d) the period of time during which the data are collected.

The Hillsboro Airport ASOS surface meteorological monitoring station qualifies as site-specific data for several reasons. First, the Hillsboro Airport meteorological monitoring site is the closest ASOS site and located in very close proximity to the Intel locations, with nearly identical elevations above mean sea level (amsl). Second, both locations are located in the same area of the broad and relatively flat Tualatin Valley. Third, the ASOS monitoring location at the airport was selected to be far enough from wind flow perturbations caused by buildings and other features. Fourth, the period of meteorological data selected at the time of the modeling analyses (2016-2020) would be expected to be the most representative of current conditions, with the same general land uses surrounding the current ASOS location and airport as well as the proposed project site. A review of current Google Earth photo-aerials shows that nearby land uses now at both locations are similar to the land uses reflected in the 2016 and 2020 NLCD sets. Additionally, these data meet the EPA data recovery requirements for air quality modeling as described earlier.

Representativeness is defined in the document *“Workshop on the Representativeness of Meteorological Observations”* (Nappo et. al., 1982) as “the extent to which a set of measurements taken in a space-time domain reflects the actual conditions in the same or different space-time domain taken on a scale appropriate for a specific application.” Judgments of representativeness should be made only when sites are climatologically similar, as is the case with the meteorological monitoring site and the proposed project location. In determining the representativeness of the meteorological data set for use in the dispersion models at the project site, the consideration of the correlation of terrain features to prevailing meteorological conditions, as discussed earlier, would be nearly identical to both locations since the orientation and aspect of terrain at the proposed project location correlates well with the prevailing wind fields as measured by and contained in the meteorological dataset. In other words, the same mesoscale and localized geographic and topographic features that influence wind flow patterns at the meteorological monitoring site also influence the wind flow patterns at the proposed project site.

For these reasons, the Hillsboro Airport meteorological data selected for use in modeling emissions from the proposed project are expected to satisfy the definition of representative, and therefore site-specific, meteorological data and are similar to the dispersion conditions at the project site and to the regional area. An annual wind rose for the five-year modeling period is shown in Figure 5.

**Existing Baseline Air Quality Data:** The nearest air quality monitoring sites to the proposed project are listed in Table 4 which also lists the monitored pollutants and distances to the project.

In addition to the monitoring site data, the ODEQ allows for the use of the *Northwest International Air Quality Environmental Science and Technology Consortium (NW-AIRQUEST)* data for the 2014-2017 period which is considered design data for the 2023 period and can be considered representative of the impact areas. These data sets are summarized in Table 5.



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Table 4 Ambient Monitoring Site Information				
Monitors	Distance from Ronler Acres (km)	Distance from Aloha (km)	Pollutants Monitored	Monitoring Objective
SE Lafayette (SEL) 5824 SE Lafayette St. (EPA# 41-051-0080)	25	22	CO, NO <sub>2</sub> , Ozone, PM <sub>10</sub> , PM <sub>2.5</sub> , SO <sub>2</sub>	Population/NAAQS
Tualatin at I-5 (TBC) (EPA# 41-067-0005)	21	15	CO, NO <sub>2</sub> , Ozone, PM <sub>2.5</sub>	Source/NAAQS
Hare Field (HHF) Grant Street (EPA# 41-067-0004)	5	8	PM <sub>2.5</sub>	Population/NAAQS

Table 5 Background Monitoring Data									
Pollutant	Units	Avg Time	Stations	2018	2019	2020	2021	2022	NW AIRQUEST Design Value
<b>PM2.5</b>	ug/m <sup>3</sup>	24 Hr 1 <sup>st</sup> High	Hare Field	28	36	28	24	47	NA
			Tualatin	19	32	28	20	66	
			S. Lafayette	20	30	31	23	75	
		24 Hr 98 <sup>th</sup> percentile	Hare Field	18	24	18	15	29	19.6
			Tualatin	17	21	18	18	28	
			S. Lafayette	17	20	23	16	27	
Annual Mean	ug/m <sup>3</sup>	Annual Mean	Hare Field	6.1	6.7	6.1	5.8	7.9	6.3
			Tualatin	7.1	6.8	6.8	6.7	8.5	
			S. Lafayette	6.8	6.5	7.1	6.4	7.9	
<b>PM10</b>	ug/m <sup>3</sup>	24 Hr 1 <sup>st</sup> High	Hare Field	28	36	28	24	47	55
			Tualatin	19	32	28	20	66	
		24 Hr 2 <sup>nd</sup> High	S. Lafayette	20	30	31	23	75	
			Hare Field	18	24	18	15	29	
<b>CO</b>	ug/m <sup>3</sup>	8 Hr 1 <sup>st</sup> High	Tualatin	1145	1145	1145	1145	1260	1306
			S. Lafayette	1832	1832	1718	1947	1947	
		1 Hr 1 <sup>st</sup> High	Tualatin	1603	1489	**	1603	2061	1744
			S. Lafayette	2405	2176	**	2978	2405	
<b>NO<sub>2</sub></b>	ug/m <sup>3</sup>	1 Hr 1 <sup>st</sup> High	Tualatin	83	77	79	71	64	NA
			S. Lafayette	88	81	66	68	68	
		1 Hr 98 <sup>th</sup> percentile	Tualatin	72	62	56	56	58	65.7
			S. Lafayette	66	60	55	58	56	
		Annual Mean	Tualatin	23	21	19	17	19	14.2
<b>SO<sub>2</sub></b>	ug/m <sup>3</sup>	1 Hr 1 <sup>st</sup> High	S. Lafayette	9	8	8	8	8	NA
			S. Lafayette	3	3	4	5	5	
		24 Hr 1 <sup>st</sup> High	S. Lafayette	3	3	4	5	5	6.0
			S. Lafayette	8	8	5	8	8	12.6
		Annual Mean	S. Lafayette	1.2	0.6	0.6	1.3	1.5	1.20

Notes: Data for 2021-2022 was derived from EPA AIRS Monitored Values Reports. NA = not applicable ND = no data  
 ODEQ data for 2018-2020 was also supplemented by EPA AIRS data as necessary.  
 \*\* ODEQ fire data not removed by EPA.



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Federal regulations, specifically 40 CFR Part 58 Appendix D, require that a State and Local Air Monitoring (SLAMS) network be designed to meet a minimum of three basic monitoring objectives: Provide air pollution data to the public in a timely manner, support compliance with the National Ambient Air Quality Standards (NAAQS), and support air pollution research. A variety of site types are needed to support these basic objectives, including six (6) general types listed below:

1. Sites are located to determine the highest concentrations expected to occur in the area covered by the network.
2. Sites are located to measure typical concentrations in areas of high population density.
3. Sites are located to determine the impact of significant sources or source categories on air quality.
4. Sites are located to determine general background concentration levels.
5. Sites are located to determine the extent of regional pollutant transport among populated areas.
6. Sites are located to measure air pollution impacts on visibility, vegetation damage, or other welfare-based impacts.

The physical sitting of an air monitoring station must conform to 40 CFR Part 58 and its location must achieve a spatial scale of representativeness that is consistent with the monitoring objective and site type. The spatial scale results from the physical location of the site with respect to the pollutant sources and categories. It estimates the size of the area surrounding the monitoring site that experiences uniform pollutant concentrations. The categories of spatial scale are:

1. Microscale-Defines the concentrations in air volumes associated with area dimensions ranging from several meters up to about 100 meters.
2. Middle scale-Defines the concentration typical of areas up to several city blocks in size with dimensions ranging from about 100 meters to 0.5 kilometer.
3. Neighborhood scale—Defines concentrations within some extended area of the city that has relatively uniform land use with dimensions in the 0.5 to 4.0 kilometers range.
4. Urban scale-Defines concentrations within an area of city-like dimensions, on the order of 4 to 50 kilometers.
5. Regional scale-Defines usually a rural area of reasonably homogeneous geography without large sources and extends from tens to hundreds of kilometers.
6. National and global scales-These measurement scales represent concentrations characterizing the nation and the globe as a whole.

The selection of these monitoring sites is also based on the monitoring stations' objective, which is NAAQS and population exposure for measuring background air quality. These monitoring objectives can be used to support the demonstration of compliance with the NAAQS when coupled with dispersion modeling.

Along with the monitoring objective is the spatial scale of the monitoring site which is used to represent high concentration locations, population and background exposure. The spatial scale of the SE Lafayette monitoring station is summarized below by pollutant:

- NO<sub>2</sub> – Urban which represents highest concentration, population exposure and general background.
- Ozone – Urban which represents highest concentration, population exposure and general background.
- CO – Micro scale which represents highest concentration.
- SO<sub>2</sub> – Urban which represents highest concentration, population exposure and general background.



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- PM10 – Neighborhood which represents highest concentration, population exposure and general background.
- PM2.5 – Neighborhood which represents highest concentration, population exposure and general background.

The spatial scale for Hare Field is:

- PM2.5 – Neighborhood scale which is used for highest concentration, population exposure and general background.

The spatial scale for the Tualatin monitoring station is microscale whose primary purpose is to monitor freeway-based concentration data for NO<sub>2</sub>, CO, Ozone, and PM2.5. While microscale is useful for determining highest concentration data, the immediate proximity to Interstate Route 5 (I-5) make this monitoring data better suited to identifying temporal (freeway-based impacts) to air quality based on time of day rather than measuring a true background data set that is not influenced by any one source or source type. As such, the further use of this data set was not considered.

As referenced above, there is also gridded background air quality data based on the NW AIRQUEST data set that covers the project area. This data set (2014-2017) can also be used as representative background if demonstrated to be appropriate and applicable to a particular project area. And while the use of the NW AIRQUEST data can be considered conservative for some pollutants and averaging periods, as noted below, this data set does not track the current background air quality trends over the last five (5) years as discussed below.

Based on the goals and objectives of the specific monitors listed in Table 4, the selection of the SE Lafayette and Hare Field monitoring sites were chosen to represent background for use in the dispersion modeling analyses.

In order to select the applicable background monitored data set to use in the modeling analyses, a trend analysis of the background air quality data based on the last five (5) years is summarized below which is based on the data in Table 5. Background trends for CO and SO<sub>2</sub> are not summarized below as the project impacts are expected to be less than the applicable significant impact levels (SILs). Additionally, the SE Lafayette monitoring station represents the highest (design value) concentration for CO and the NW AIRQUEST represents the highest design value for SO<sub>2</sub>. These locations will be used to represent background as needed for the project modeling analyses.

The overall trend in background NO<sub>2</sub> for the last five (5) years (2018-2022) at the SE Lafayette monitoring station has been downward for both 1 hour (98<sup>th</sup> percentile) and annual averages. A similar trend is noted at the Tualatin monitoring site. Note the NW AIRQUEST data is consistent with the 2018 monitoring data and does not reflect the decrease in background over time.

This trend for PM2.5 is not duplicated as the background concentrations at SE Lafayette, Tualatin and Hare Field have shown a small increase in background monitored concentrations since 2018. While the PM2.5 trend decreased during the 2021 time period, overall, the trend has been upward. As noted with the NO<sub>2</sub> trends, the NW AIRQUEST data best represents the year 2018 and does not reflect the increase in background over time.

PM10 trends at the SE Lafayette site show similar increases between the years 2018 and 2022.



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**Summary of Selected Data:** Based on the monitoring objectives (NAAQS), the spatial scales (Urban and Neighborhood) of the Hare Field and SE Lafayette monitoring stations and the last five (5) years of background trends, these sites were selected as being the most representative for determining the background concentrations to be used in the modeling analyses in place of the NW AIRQUEST design values. For NO<sub>2</sub>, Ozone and PM10 background data, SE Lafayette is proposed with PM2.5 background based on Hare Field, which is also the closest PM2.5 monitoring station to the project site. For background CO and SO<sub>2</sub>, the SE Lafayette is proposed for use in the modeling analyses.

The proposed background concentrations will be the highest values over the last three (3) year period for 1-and 8-hour CO, 24-hour PM10, annual NO<sub>2</sub> and 1, 24-hour and annual SO<sub>2</sub>. 24-hour and annual PM2.5 background concentrations will be based on the 3-year average in accordance with *"Guidance for PM2.5 Permit Modeling" (05/25/14)*. Table 6 presents the proposed background concentration data for use in the dispersion modeling assessments.

For 1-hour NO<sub>2</sub>, seasonal hourly background NO<sub>2</sub> for the 2019-2021 data period will be used, in accordance with the procedures found in *"Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the PSD Program" (6/29/10)* and *"Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> NAAQS" (3/01/11)*. Complete hourly data from the 2022 data period is not yet available for use so the seasonal hourly background NO<sub>2</sub> for modeling will be the 2019-2021 data period. In accordance with EPA procedures, the third highest value for each hour and season will be used to calculate the three-year average of each time period.

Seasonal Hour-Of-Day is determined by organizing all of the NO<sub>2</sub> concentrations by hour of day (1AM, 2AM, 3AM, etc.) for each season of the year in descending order and selecting the 3<sup>rd</sup> highest NO<sub>2</sub> concentrations for each hour of the day and season.

For example, (1AM)

1. First take all the 1AM values (maximum of 90-92 numbers) for each Season
  - a. Winter = December of Previous Year, January, February
  - b. Spring = March, April, May
  - c. Summer = June, July, August
  - d. Autumn = September, October, November
2. Organizing the NO<sub>2</sub> concentrations in descending order (highest to lowest)
3. Take the 3<sup>rd</sup> highest NO<sub>2</sub> concentrations.
4. This value will be used to represent the 1AM 3<sup>rd</sup> highest or 98<sup>th</sup>- percentile of available data.
5. The above process is repeated for each hour of the day and season.
6. Repeat steps 1 thru 5 for each of the three years under review.
7. Average the three 1AM NO<sub>2</sub> concentrations.
8. This value will be used in AERMOD as the NO<sub>2</sub> background concentrations (3yr average of the 98<sup>th</sup> percentile) for the 1AM hour and season.
9. Repeat step 7 and 8 for each of the hours in the day and season.



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Table 6 Background Air Quality Data Summary	
Pollutant and Averaging Time	Background Value ( $\mu\text{g}/\text{m}^3$ )
PM10 – 24-hour 3-year 2 <sup>nd</sup> High NAAQS	39.0
PM2.5 <sub>5</sub> – 3-Year Average of Annual 24-hour 98 <sup>th</sup> Percentiles NAAQS	20.7
PM2.5 <sub>5</sub> – 3-Year Average of Annual Values NAAQS	6.6
CO – 1-hour High NAAQS	2,978
CO – 8-hour High NAAQS	1,947
NO <sub>2</sub> – 3-Year Average of Annual 98 <sup>th</sup> Percentile 1-hour Daily Maximum NAAQS	56.3*
NO <sub>2</sub> – Annual Maximum NAAQS	18.3
SO <sub>2</sub> – 3-Year Average of Annual 99 <sup>th</sup> Percentile 1-hour Daily Maxima NAAQS	7.0
SO <sub>2</sub> – 24-hour Maximum CAAQS 24-hour High, 2 <sup>nd</sup> High NAAQS	4.7
SO <sub>2</sub> – Annual Maximum NAAQS	1.1
Notes: * Hourly background concurrent with the 2016-2020 meteorology will be used for modeling. This value is just for reference. Conversion of ppm/ppb measurements to $\mu\text{g}/\text{m}^3$ concentrations based on: $\mu\text{g}/\text{m}^3 = \text{ppm} \times 40.9 \times \text{MW}$ , where MW = 48, 28, 46, and 64 for ozone, CO, NO <sub>2</sub> , and SO <sub>2</sub> , respectively.	

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Several dispersion models are proposed for use to quantify pollutant impacts on the surrounding environment based on the emission sources and operating parameters. AERMOD will be used to determine facility impacts on Class II areas in the immediate project vicinity in simple, intermediate, and complex terrain areas during project operations. AERMOD will be the primary model used for comparison of project impacts to SILs and demonstration of compliance with AAQS. Modeling of operational impacts are described below.

For modeling the project's operational concentrations due to emissions from the proposed sources on nearby simple and complex terrain, the AERMOD model will be used with the entire hourly meteorological data (described above).

**AERMOD Model, Options, and Procedures:** AERMOD is a steady-state plume dispersion model that simulates transport and dispersion from multiple point, area, or volume sources based on updated characterizations of the atmospheric boundary layer. AERMOD uses Gaussian distributions in the vertical and horizontal for stable conditions, and in the horizontal for convective conditions; the vertical distribution for convective conditions is based on a bi-Gaussian probability density function of the vertical velocity. For elevated terrain AERMOD incorporates the concept of the critical dividing streamline height, in which flow below this height remains horizontal, and flow above this height tends to rise up and over



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terrain. AERMOD also uses the advanced PRIME algorithm to account for building wake effects. AERMOD input data options are listed below following these EPA modeling guidance documents.

- Final plume rise
- Stack tip downwash
- Regulatory default option (i.e., calm and missing meteorological data processing and elevated terrain heights option)

Flagpole receptors are not proposed to be used (ground level concentrations will be calculated). AERMAP will be used to calculate receptor elevations and hill height scales for all receptors from NED data in accordance with EPA guidance. Selection of the receptor grids is discussed below.

**NO<sub>2</sub> Modeling Procedures:** NO<sub>2</sub> impacts will first be assessed using a conservative Tier 2 analysis using the Ambient Ratio Method Version 2 (ARM2), adopted in the *Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the PSD Program* (6/29/10). The Guideline allows a nationwide default conversion rate of 75% for annual NO<sub>2</sub>/NO<sub>x</sub> ratios and 80% for 1-hour NO<sub>2</sub>/NO<sub>x</sub> ratios for the current Tier 2 Method. A Tier 2 analysis is expected to be sufficient for modeling annual NO<sub>2</sub> impacts for the steady state sources to demonstrate compliance with the NAAQS.

A Tier 3 analysis is proposed to assess the 1-hour NO<sub>2</sub> concentrations from the intermittent sources (emergency generators) for comparison with the 1-hour NAAQS. For the Tier 3 analysis, the plume volume molar ratio method (PVRMR) is proposed. This analysis will use ambient ozone measured at the SE Lafayette monitoring site. As the source of the background air quality data to be used in the modeling analysis, SE Lafayette has been shown above to be representative of the project site. As proposed, the Tier 3 analysis will be used along with the temporal pairing of modeled NO<sub>x</sub> concentrations with concurrent hourly background ozone data from the SE Lafayette monitoring site to determine NO<sub>2</sub> concentrations based on PVMRM. The ozone data will be based on the same years as the AERMOD meteorology data. NO<sub>2</sub>/NO<sub>x</sub> ratios will be based on equipment specific data contained in the EPA ISR database. A NO<sub>2</sub>/NO<sub>x</sub> ratio of 0.10 is proposed for use on the emergency generators.

The fire pumps and emergency generators operate intermittently, for a limited number of hours in the year for maintenance and readiness testing. Intel's current air permit specifies that no more than ten (10) generators may be run in a day and the generators can only be run during daylight hours, which is defined as hours between 8 am and 6 pm. To evaluate compliance with long-term air quality standards, these sources will be modeled using annualized emissions (hourly emission rate times the number of hours run per year divided by 3,650) for all hours of the day.

The emergency generators typically run up to 25 hours per year, with 50 hours for the emergency fire pumps. As explained in EPA's March 1, 2011, memorandum, *"Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour National Ambient Air Quality Standard"*<sup>2</sup> it is unlikely that emissions from the intermittently operated emergency generators will coincide with the worst-case meteorological conditions and modeled 1-hr NO<sub>2</sub> impacts can be significantly overestimated. As such, EPA also suggests in their March 1, 2011, memo that these types of intermittent sources can be excluded from compliance demonstrations for the 1-hour NO<sub>2</sub> standard. Nonetheless, Intel is proposing to include emergency generator emissions in the 1-hour NO<sub>2</sub> standard compliance demonstration using the methodology described below.

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<sup>2</sup> EPA Memorandum, "Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub>, National Ambient Air Quality Standard", March 1, 2011.



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Since the generators only run intermittently, they pose a challenge to accurately reflect potential ambient air quality impacts. One approach suggested by EPA<sup>3</sup> is to model impacts from intermittent sources based on an annualized hourly emission rate, rather than the maximum hourly emissions. This approach would account for potential worst-case meteorological conditions combined with essentially continuous operation of the emergency generators at an average hourly emission rate. This approach will be used for the SIL evaluations but for the 1-hour NO<sub>2</sub> NAAQS, a Monte Carlo method, as discussed below, will be used. This method accounts for the statistical variation in intermittent operation occurrences.

**Additional Modeling Procedures:** For the other pollutants and averaging times, AERMOD will be used to determine the worst-case group of engines from the source groups used in the Monte Carlos analysis as identified in Table 7. For the 24-hour PM<sub>2.5</sub> and PM<sub>10</sub> standards, each one (1) hour of testing emissions will be prorated over 10 hours, which represents the 10-hour operating day, in order to calculate the 24-hour impacts. The worst-case daily operation of the groups of the emergency generators will be identified in AERMOD by assuming that each major group of engines in Table 7 are operated for the 10-hour day. From this, the applicable engine group will be added to the non-intermittent sources at the site to determine increment and/or NAAQS. This will also be done for 1 and 8-hour CO and 1 and 24-hour SO<sub>2</sub>.

For short-term SO<sub>2</sub>, the worst-case groups will be modeled with the sum of the hourly emission rate (10x) for 10 hours per day using the maximum hourly emission rate for the group. This will provide a very conservative estimate as all groups will be run every day with all generators running at the same time, rather than on separate days.

AERMOD will be run on the Intel facility for NO<sub>x</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, and CO emissions and the results compared to the appropriate SIL. If the project impacts are less than the SIL, then the evaluation of that pollutant is considered complete. If the impacts exceed the SILs, then a full cumulative and applicable increment impact analyses will be conducted as described below. Preliminary results indicate that the project CO emissions will be less than the SILs while the other pollutant impacts will be over the SILs.

**Monte Carlo Simulation:** For 1-hr NO<sub>2</sub>, a Monte Carlo Simulation was used to estimate the NO<sub>2</sub> impacts from running intermittently operated emergency generators. In permitting, typically AERMOD design values (e.g. 98 percentile) are added to background design values. In the case of generators which run infrequently (~1% of the time), the impacts of the generators are statistically likely not to occur on the high background hours. Thus, modeling the generators as continuous sources greatly overestimates the occurrences of exceedances as the high modeled impacts are added to the high background under all conditions. A Monte Carlo simulation is used to model the probability of different outcomes in a process that cannot easily be predicted due to the intervention of random variables. For example, the specific hour/day that a set of generators will run is generally unknown. The operation of the generators may or may not correspond to a poor dispersion period, as the occurrence of these events is essentially random. This Monte Carlo approach accounts for the random nature of both the generator operation and the underlying meteorological conditions.

A Monte Carlo Simulation involves the following steps. First, hourly NO<sub>2</sub> background as assembled for each day in a five (5) year period and grouped by month. Next, the model is run (without background) with 15 separate source groups of generators, identified in Table 7.

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<sup>3</sup> ibid





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The operating scenario is that no more than seven (7) generators will be run in one (1) hour (8 engines in source group 8, 6 engines in source groups 4 through 6 and source group 9) and that all 17 source groups will be run over 15 days per month, with each engine limited to 25 hours per year for testing and maintenance. The generators groups are shown in Table 7.

Table 7 Monte Carlo Generator Groups		
Group ID	Count	Generator IDs
1	7	EGE1_01-07
2	7	EGE1_08-14
3	7	EGE1_15-21
4	6	EGC5_01-06
5	6	EGC5_07-12
6	6	EGC5_13-18
7	3	EGC5_19-21
8	7	EGDD_01-07
9	6	EGDA_01-06
10	2	EGDA_07-08
11	4	EGR1_01-04
12	5	EGDC_01-05
13	3	EGRB1_01, EGRP1_01-02
14	3	EGR4_01, EGRS6_01-02
15	3	EGDB_01-03
16	4	EGIW_01-03, EGR8_01
17	7	EGN2_01, EGF15_01-03, EGF5-01-02
Total Engines	86	

The generators are only modeled for the 10-hour period as noted above. The AERMOD output is hourly NO<sub>2</sub> concentrations for the continuous sources and the 17 generator groups. The data are assembled by day for five (5) years and organized by month (operational up to 152 days per year). Thus, a modeled day includes 15 generator groups run for each day. Once the data is assembled, the Monte Carlo simulation is run using the following iteration process which is also summarized in Figure 6.

For each iteration:

For each month,

- Randomly select model days for each day of the month from the 5-year block for that month
- Assume days one (1) through 15 correspond to generator days (e.g. day 1 = group 1, day 2 = group 2, etc.) and randomly select hour between 8:00 AM and 6:00 PM in which the generators will run.
- On hourly basis, find the total concentration (C(h)) by taking the model values CM(h) for EG(h) for the generators. Specifically:

$$C(h) = CM(h) \quad \text{for } h \neq \text{hour picked for generators}$$

$$C(h) = CM(h) + EG(h) \quad \text{for } h = \text{hour picked for generators}$$



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Note that the generators are run on the same day as the continuous sources for consistency.

- Find highest C(h) for that day and save (also record month and day)

Repeat above steps for each month for 3 years:

- For each year, rank maximum daily concentrations from highest to lowest.
- Find and average the high eighth high (H8H) values and save.

Repeat above steps one thousand (1,000) more times then take median of all runs to get design value for comparison against the 1-hour NO<sub>2</sub> standard. The results will also be summed across all years of meteorology and receptors in order to add these results to the steady state source impacts at the same receptor(s). Background will be added to the steady state source impact prior to the summation of the results with emergency generators for comparison with the 98<sup>th</sup> percentile 1-hour NO<sub>2</sub> NAAQS. While the results will be paired in space, they will not be able to be paired in time as the steady state source analyses do not use the Monte Carlo method for determining the 98<sup>th</sup> percentile impacts. However, the results, paired in space only, will be larger than if paired in both space and time.

**GEP Stack Height and Downwash:** Stack locations and heights and building locations and dimensions will be input to BPIP-PRIME. The first part of BPIP-PRIME determines and reports on whether a stack is being subjected to wake effects from a structure or structures. The second part calculates direction-dependent “equivalent building dimensions” if a stack is being influenced by structure wake effects. The BPIP-PRIME output is formatted for use in AERMOD input files.

**Receptor Selection:** Receptor and source base elevations will be determined from United States Geological Survey (USGS) National Elevation Dataset (NED) data. The NED data will be processed with the EPA-model AERMAP for the receptor locations selected. All coordinates (both sources and receptors) will be referenced to UTM North American Datum 1983 (NAD83, Zone 11). AERMAP is capable of interpolating the elevation data in the NED data for both receptor elevations and hill height scales.

The NED data are available in 1/3-arcsecond (about 10 meter) and 1-arcsecond (about 30 meter) grid node spacing. Areas that contain receptor grids with 100 meter spacing or less between adjacent receptors will use 10 meter NED data. Other areas that contain only receptor grids of greater than 100 meter spacing may utilize 30 meter NED data. For purposes of determining hill height scales, the NED datasets used will extend 5-km past the outside of the coarse receptor grid described below for 30-meter NED data and 2-km past the outside of the intermediate/downwash receptor grids described below for 10-meter NED data.

Cartesian coordinate receptor grids will be used to provide adequate spatial coverage surrounding the project area for assessing ground-level pollution concentrations, to identify the extent of significant impacts, and to identify maximum impact locations. For the full impact analyses, a nested grid will be developed to fully represent the initial location and extent of significance area(s) and maximum impact area(s). The nested grid will be comprised of the following:

- Receptors will be placed along the proposed project fenceline with a spacing of about 25 meters or less between adjacent receptors.
- The downwash receptor grid with a receptor spacing of 25 meters will extend from the project fence line out to 300 meters from the project.
- An intermediate receptor grid with 50-meter receptor spacing will extend from the downwash receptor grid out to 1000 meters from the project fenceline.



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- The second intermediate receptor grid with 100-meter receptor spacing will extend from the first intermediate receptor grid outwards to two (2) kilometers (km) from the project fenceline in all directions.
- A coarse grid with 200-meter receptor spacing will extend out five (5) km from the project in all directions.
- A second course grid with 500 meters spacing will extend outwards ten (10) km from the project fenceline in all directions.
- Extended grids with 1,000 meters spacing will be used to close off the applicable modeled SIL's as needed.
- When maximum impacts occur in areas outside the 25-meter spaced receptor grid, additional refined receptor grids with 25-meter resolution will be placed around the maximum impacts and extended as necessary to determine maximum impacts.

Ambient concentrations within the facility fenceline will not be calculated.

Figure 7 presents the receptor grids based on the discussion above.

**Ambient Air Quality Impact Analyses:** In evaluating the impacts of the proposed project on ambient air quality, the ambient impacts of the project will be added to background concentrations and compared to the state and national ambient standards for SO<sub>2</sub>, NO<sub>2</sub>, PM<sub>10</sub>, PM<sub>2.5</sub>, and CO. The project impacts will also be compared to the EPA modeling significance impact levels (SILs). The NAAQS and EPA SILs are shown in Table 9.

Table 9 SILS and NAAQS		
Pollutant and Averaging Time	EPA SILs	National AAQS
PM10 – 24-Hour	5 µg/m <sup>3</sup>	150 µg/m <sup>3</sup>
PM2.5 – 24-Hour	1.2 µg/m <sup>3</sup>	35 µg/m <sup>3</sup> Average of Ann.98 <sup>th</sup> %s
PM2.5 – Annual	0.3 µg/m <sup>3</sup>	12.0 µg/m <sup>3</sup> Average of Annual Impacts
NO <sub>2</sub> – 1-Hour	7.5 µg/m <sup>3</sup>	188 µg/m <sup>3</sup> Average of Ann.98 <sup>th</sup> %s
NO <sub>2</sub> – Annual	1 µg/m <sup>3</sup>	100 µg/m <sup>3</sup>
CO – 1-Hour	2000 µg/m <sup>3</sup>	40,000 µg/m <sup>3</sup>
CO – 8-Hour	500 µg/m <sup>3</sup>	10,000 µg/m <sup>3</sup>
SO <sub>2</sub> – 1-Hour	7.8 µg/m <sup>3</sup>	196 µg/m <sup>3</sup> Average of Ann.99 <sup>th</sup> %s
SO <sub>2</sub> – 24-Hour	5 µg/m <sup>3</sup>	1300 µg/m <sup>3</sup>
SO <sub>2</sub> – Annual	1 µg/m <sup>3</sup>	80 µg/m <sup>3</sup>
Overall maximum impacts will generally be used for pollutants and averaging times where other types of statistical averages are not specified.		

**Significant Impact Areas:** Modeled concentrations that exceed the applicable SILs will be used to determine the extent of the Significant Impact Areas (SIAs), which are circular areas with radii equal to the distance of the furthest significant receptor from the project for the NAAQS and PSD increment. SILs and the associated SIAs will be based on the following:



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- 1-hour NO<sub>2</sub> and SO<sub>2</sub> based on the 5-year average of the maximum 1-hour concentrations each year at each receptor due to normal facility operations using ARM2. Intermittent sources such as the emergency generators will be included in the SILs analysis but will use the EPA method for modeling which is based on the annualized emissions.
- 24-hour PM<sub>2.5</sub> based on the five (5)-year average of the maximum 24-hour concentrations each year at each receptor
- Annual PM<sub>2.5</sub> is based on the five (5)-year average of the annual concentrations for all years at each receptor.
- 24-hour PM<sub>10</sub> and SO<sub>2</sub> based on the over maximum 24-hour concentration during any of the five (5) years at each receptor.
- 1 and 8-hour CO will be based on the maximum concentration for each receptor overall five (5) years.
- Annual SO<sub>2</sub> based on the maximum annual concentration for each year and at each receptor.

**Proposed PM<sub>2.5</sub> SIL:** The proposed Class I and Class II PM<sub>2.5</sub> SILs for this project are identical to the EPA established SILs, which were vacated by the courts. With respect to reliance on the PM<sub>2.5</sub> SILs, EPA cautioned that reliance on the SILs alone to demonstrate that a source will not cause or contribute to a violation of the PM<sub>2.5</sub> NAAQS is inadequate. However, EPA stated that permitting authorities have the discretion to select and utilize a PM<sub>2.5</sub> SIL value if there is sufficient justification for the selected SIL value and justification in the manner in which it will be used. The SIL values for PM<sub>2.5</sub> in EPA regulations can also continue to be used if the permitting authority also takes background concentrations of PM<sub>2.5</sub> into account. For this project, the difference between the PM<sub>2.5</sub> NAAQS and the monitored PM<sub>2.5</sub> background concentrations in the area is greater than the SILs. Based on the data in Table 7, over 41 percent of the available standard is still available. Thus, given the amount of available PM<sub>2.5</sub> standard in the project region, the applicant proposes to use the previously vacated PM<sub>2.5</sub> SILs for both Class I and Class II modeling assessment, for the NAAQS. If any of the modeling demonstrates an existing violation to the NAAQS, it is proposed that the applicant may continue to show that the proposed source does not contribute to an existing violation of the PM<sub>2.5</sub> NAAQS by demonstrating that the proposed source's PM<sub>2.5</sub> impact does not significantly contribute to an existing violation of the PM<sub>2.5</sub> NAAQS. Comparison to the SILs for PSD Class I and Class II increments will be based on the maximum short-term or annual project impacts. For these analyses, the EPA SILs for PM<sub>2.5</sub> of 1.2 and 0.3 µg/m<sup>3</sup> for PSD Class II areas and 0.07 and 0.06 µg/m<sup>3</sup> for PSD Class I areas are proposed for evaluating project impacts for 24-hour and annual averaging times, respectively.

**NAAQS/Increment Multisource Inventory Request:** Based on results of the SILs analyses performed for the project and for those pollutants above the applicable SILs, a request of a multisource inventory of all facilities with either PM<sub>10</sub>, PM<sub>2.5</sub>, CO and NO<sub>x</sub> emissions will be made to the ODEQ. Intel will also request that the PSD-increment sources be identified for PM<sub>10</sub>, PM<sub>2.5</sub> and NO<sub>x</sub>.



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**NAAQS and Increment Modeling Procedures:** Per EPA guidance, Appendix W and the *Draft NSR Workshop Manual* require that the cumulative and increment impacts analysis to include “nearby sources”, which includes “[a]ll sources expected to cause a **significant concentration gradient** in the vicinity of the source or sources under consideration.” This is performed for sources within the SIA plus the 50 km screening area beyond the maximum radial distance of the SIA. Appendix W further instructs that the “impact of nearby sources should be examined at locations where interactions between the plume of the point source under consideration and those of nearby sources (plus natural background) can occur”. Emphasizing that “[t]he number of sources is expected to be small except in unusual situations”. Thus, only sources with a significant concentration gradient in the vicinity of the source need to be included.

To limit the total number of sources used in the cumulative NAAQS analysis, a Q/D assessment will be made on the ODEQ supplied inventory. The existing facilities in the NAAQS cumulative multisource inventory will be screened with the Q/D analysis<sup>4</sup>, where Q is the equivalent ton/year emission rate (appropriately accounting for emergency equipment) and D is the shortest distance in km from the multisource facility to the nearest SIA boundary for PM<sub>2.5</sub>/PM<sub>10</sub> and the 10-km area that is the focus of the NO<sub>2</sub> analyses. Those facilities with a Q/D value greater than 20 tpy/km will be included in the cumulative NAAQS.

For assessing increment, the major and minor source baseline dates have already been triggered. As such, it will be assumed that in the absence of a distinct increment consumption inventory that all cumulative sources used in the NAAQS analysis will also be increment consumers. Based on the results of the SIL analyses, increment for 24-hour and annual PM<sub>2.5</sub>, 24-hour PM<sub>10</sub> and annual NO<sub>2</sub> will be assessed. There are no PSD increments for CO. SO<sub>2</sub> will not be emitted at the major (PSD) source levels.

**Ozone and Secondary PM<sub>2.5</sub> Formation:** The EPA developed a Tier 1 demonstration tool for ozone and PM<sub>2.5</sub> precursor emissions called Modeled Emission Rates for Precursors (MERPs). The development of the tool and related guidance is summarized in a memorandum from EPA dated April 2019, with a subject, “*Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tool for Ozone (O<sub>3</sub>) and PM<sub>2.5</sub> under the PSD Permitting Program.*” The basic idea behind the MERPs is to use technically credible air quality modeling to relate precursor emissions and peak secondary pollutant impacts from specific or hypothetical sources. The ODEQ AQDM Recommended Procedures will be used the air quality modeling results presented in EPA MERPs memorandum to derive MERPs for hypothetical sources located in the Western U.S.

MERPs can be used to demonstrate that projected impacts from a proposed source are less than the applicable SILs or when included with the modeling results, would not cause or contribute to a violation of a NAAQS or PSD increment for that pollutant.

The MERP is based on a hypothetical source emission rate, the modeled concentration from that emission rate, and the relevant SILs for O<sub>3</sub> and PM<sub>2.5</sub> (1 ppb for O<sub>3</sub>, 1.2 µg/m<sup>3</sup> for 24-hr PM<sub>2.5</sub>, and 0.2 µg/m<sup>3</sup> for annual PM<sub>2.5</sub>). The lowest MERP value for each precursor identifies the most conservative condition. ODEQ recommends the use of the Morrow, Oregon site, which is located near Arlington on the Columbia River. For the Tier I analysis, the smallest MERP values will be used for the 8-hour O<sub>3</sub> impact assessment and the 24 and annual PM<sub>2.5</sub> assessment.

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<sup>4</sup>North Carolina Department of Environment and Natural Resources - Air Permit Unit, 1985: A Screening Method for PSD, July 22, 1985. Memo from Eldewins Haynes to Lewis Nagler, EPA Region IV. This method was originally approved by EPA Region IV in a September 5, 1985 letter from Bruce Miller to Eldewins Haynes.



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### *O<sub>3</sub> 8-hr avg. analysis*

- For NO<sub>x</sub> the lowest MERP is 258 for a hypothetical 500 tpy source and a concentration of 1.9396 ppb
- For VOC the lowest MERP is 1087 for a hypothetical 500 tpy source and a concentration of 0.46018 ppb

### *PM<sub>2.5</sub> 24-hr avg. analysis*

- For NO<sub>x</sub> the lowest MERP is 3003 for a hypothetical 500 tpy source and a concentration of 0.19979 ug/m<sup>3</sup>
- For SO<sub>x</sub> the lowest MERP is 2314 for a hypothetical 500 tpy source and a concentration of 0.25927 ug/m<sup>3</sup>

### *Annual PM<sub>2.5</sub>*

- For NO<sub>x</sub> the lowest MERP is 7942 for a hypothetical 500 tpy source and a concentration of 0.01259 ug/m<sup>3</sup>
- For SO<sub>x</sub> the lowest MERP is 11877 for a hypothetical 500 tpy source and a concentration of 0.00842 ug/m<sup>3</sup>

**PSD Class I AQRV Analyses:** The Facility will be a federal major source for criteria pollutant emissions subject to PSD permitting requirements. PSD Class I Air Quality Related Value (AQRV) analyses, including visibility and nitrogen deposition may also be required. The nearest Class I area is the Mount Hood National Forrest, operated by the U.S. Forest Service, located approximately 80 km to the east. Seven (7) additional Class I areas are located within 200 km of the facility. The range of distances to each Class I area is listed in Table 10 below and are also presented in Figure 8.

Following the most recent FLAG Workshop procedures (June 2010), the use of the Screening Procedure (Q/D) to determine if the project could screen out of a formal AQRV assessment for visibility and nitrogen deposition was made. Following the screening procedures in FLAG, Q is calculated as the sum (in tons/year) of emissions of NO<sub>x</sub>, SO<sub>x</sub>, and PM<sub>2.5</sub> based on the worst-case hour on the worst-case day and adjusted to reflect 365 days of operation. The screening calculation takes the form of:

$$Q = \text{sum (NO}_x\text{+PM}_{2.5}\text{+SO}_x\text{) in maximum lbs/hr (for 24-hours) for the worst-case day * 365 days/year}$$

The results of the Q/D scenarios are presented in Table 10.

If Q/D is less than 10, then no AQRV analysis is required, as shown above for the nearest Class I area. Based on the ratio of Q/D, none of the Class I areas have a Q/D of greater than 10. Therefore, it is proposed that no further analyses of AQRVs for visibility or nitrogen deposition are required for those areas. The applicant will coordinate with the FLM's on the Q/D results as well as providing a copy of this modeling protocol.



TABLE 10 NEARBY CLASS I AREAS AND Q/D SCREENING RESULTS		
Class I Areas	Minimum Distance (km)	Q/D (Worst Case)
Mt Hood OR (MOHO)	80	7.0
Mt Jefferson OR (MOJE)	116	4.8
Mt Adams WA (MOAD)	121	4.6
Goat Rocks WA (GORO)	145	3.9
Mt Washington WA (MOWA)	150	3.7
Mt Rainier WA (MORA)	153	3.7
Three Sisters OR (THSI)	167	3.4
*Q/D based on worst case day.		

**PSD Class I SILs AERMOD Screening Analyses:** The AQRV exemption does not apply to modeling compliance with the PSD Class I increments or NAAQS, which are required if the Class I SILs are exceeded. Therefore, Class I SILs modeling will be assessed for the Class I areas listed in Table 10. Modeling will first be performed for the Intel project emissions only and then compared to the applicable Class I SILs. The Class I receptor grid and elevations given by the National Park Service Air Resources Division on the webpage will be used:

<http://www.nature.nps.gov/air/Maps/Receptors/index.cfm>

These receptors will be converted to UTM NAD83 coordinates by the US Army Corps of Engineers CORPSCON program for Class I areas within 50 km of the Intel project site(s).

The EPA Modeling Guidelines suggest that the use of AERMOD be limited to distances of less than approximately 50 km, beyond which the CALPUFF dispersion model is typically used to assess the long-range transport of pollutants. Since the requirement to assess AQRVs for each of these areas may not be required, based on the Q/D results, an alternative modeling approach with AERMOD is proposed for assessing Class I SILs for each Class I area that is located at a distance greater than 50 km. The proposed approach would utilize a ring of receptors at 50 km distance from the Intel project, with receptors placed at two (2) degree intervals over the entire 360-degree circle of receptors. For each of these receptors, the receptor heights would be based on the lowest elevation to the maximum elevation for each of the 15 Class I areas, at 100-meter elevation intervals. Using this grid, the Class I SILs listed in Table 11 would be assessed. If any of the Class I areas have impacts that exceed the SILs, then the CALPUFF modeling will be used to reassess these SILs and, if needed, would also be used to assess PSD Class I area increments and NAAQS. Figure 7 also presents the AERMOD receptor grids.



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Table 11 Class I SILs		
Pollutant	Averaging Time	Class I SIL ( $\mu\text{g}/\text{m}^3$ )
PM25	24	0.07
PM25	Annual	0.06
PM10	24	0.3
NO <sub>2</sub>	Annual	0.1

**Analyses of the Columbia River Gorge Scenic Area (CRGSA):** A separate nitrogen deposition and regional haze modeling analyses for the CRGSA may be requested by the ODEQ and the Forest Service. This request would be to address concerns on the background impacts in this area regarding visibility and deposition. The CRGSA is located approximately 40 km east of the Intel project site(s). If requested, AERMOD would be used to assess nitrogen deposition. The AERMOD model calculates atmospheric deposition of nitrogen by calculating the wet and dry fluxes of total nitrogen. This deposition is accomplished by using a resistance model for the dry deposition part, and by assigning particle phase washout coefficients for the wet removal process from rainout. The depositional parameters are input into the model in order to calculate the deposition of nitrogen. The depositional parameters will be based on nitric acid (HNO<sub>3</sub>), which is consistent with the USFS modeling assumptions that can be used to calculate the amounts of nitrogen deposition from the Intel project. Nitric acid tends to deposit more readily than most other compounds.

In addition to deposition, a nearfield coherent plume visibility assessment may be requested. The most recent version of VISCREEN (13190) would be used to conduct the plume blight analysis with a 98<sup>th</sup> percentile background visual range as recommended by the FLM Guidance.

**Additional Impact Assessments:** Additional impact assessments will be made with regards to socioeconomics and biology. The impacts to sensitive species and plants will be included with regards to pollutant concentrations and possible depositional effects. The PSD permit application package will include these additional studies. Table 12 presents the summary of the EPA SILs, NAAQS and increments that will be used throughout the modeling assessments.

### FINAL MODELING SUBMITTAL

As part of the final modeling analyses, the ODEQ will be supplied with the following materials which will be submitted in electronic format:

- AERMAP, BPIP-PRIME, and AERMOD input and output files
- Raw and processed meteorological data and background air quality data
- AERMET and AERSURFACE input and output files
- Data from the Monte Carlo Simulations
- Other data as needed to support the dispersion modeling assessments





**Table 12**  
**Significant Impact Levels (SILs), National Ambient Air Quality Standards (NAAQS), PSD Class II Increments, and Significant Monitoring Concentrations**  
**for Criteria Pollutants**

Pollutant	Averaging Period	SIL <sup>1</sup> ug/m <sup>3</sup>	NAAQS ug/m <sup>3</sup> (ppb)	Form of NAAQS with Respect to Modeling <sup>2</sup>		PSD Class II Increment <sup>3</sup> (ug/m <sup>3</sup> )	Form of Class II Increment		Significant Monitoring Concentration <sup>4</sup> (ug/m <sup>3</sup> )
NO <sub>2</sub>	1 hour	7.5 <sup>5</sup>	188 (100)	Average 8 <sup>th</sup> Highest <sup>6</sup>	EPA/OAQPS memos; <sup>7</sup> 6/29/10 & 3/01/11	---	---	---	---
	Annual	1	100 (53)	Max. annual arithmetic mean	Section 7.2.1.1 App. W	25	NTBE (Max. annual arith. mean)	Section 7.2.1.1 App. W	14
SO <sub>2</sub>	1 hour	7.8 <sup>5</sup>	196 (75)	Average 4 <sup>th</sup> Highest <sup>6</sup>	S. Page memo; 8/23/10 <sup>8</sup>	---	---	---	---
	3 hour	25	1300 (500)	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	512	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	---
	24 hour	5	365 (140) <sup>9</sup>	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	91	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	13
	Annual	1	80 (30) <sup>9</sup>	Max. annual arithmetic mean	Section 7.2.1.1 App. W	20	NTBE (Max. annual arith. mean)	Section 7.2.1.1 App. W	---
PM 2.5 <sup>10</sup>	24 hour	1.2	35	Average 1 <sup>st</sup> Highest <sup>11</sup>	S. Page memo; 3/23/10 <sup>11</sup>	9	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	4
	Annual	0.3	12	Average 1 <sup>st</sup> Highest <sup>11</sup>		4	NTBE (Max. annual arith. mean)	Section 7.2.1.1 App. W	---
PM 10	24 hour	5	150	NTBE >once/year on average over 5 years (H6H) <sup>12</sup>	Section 7.2.1.1 App. W	30	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	10
	Annual	1		REVOKED <sup>13</sup>		17	NTBE (Max. annual arith. mean)	Section 7.2.1.1 App. W	---
CO	1 hour	2000	40,000 (35,000)	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	---	---	---	---
	8 hour	500	10,000 (9000)	NTBE >once/year (H2H)	Section 7.2.1.1 App. W	---	---	---	575
Pb	Rolling 3-month Avg.	---	0.15	NTBE		---	---	---	0.1

<sup>1</sup>A 01/22/13 court decision remanded and vacated the PM2.5 SIL provision under 40CFR 52.21(k)(2) and 51.166(k)(2). Modelers are advised to consider the potential for a NAAQS exceedance by examining the existing air quality levels at representative monitors for any PSD affected pollutant. [See draft PM2.5 guidance (EPA-454/D-13-001; 180pp.)]

<sup>2</sup>Form of the standard assumes 5 years of meteorological data. If using site specific meteorological data, the form of the standard would be based on at least one year (up to 5 years) of site specific data.

<sup>3</sup>All short-term increments are based on the H-2-H regardless of the form of its respective NAAQS.

<sup>4</sup>A 01/22/13 court decision vacated the SMC for PM2.5. While the implication to other SMCs is not stated, it is prudent to obtain representative data. [See S. Page memo (03/04/13) & draft PM2.5 guidance (EPA-454/D-13-001; 180pp.). While no SMC is provided for ozone, any emissions increase of 100 tons per year or more of VOC or NOx subject to PSD would be required to obtain one year of ozone air quality data. [See 40 CFR §52.21(i)(5)]

<sup>5</sup>The 1-hour NO and 1-hour SO values are EPA interim SILs until EPA undergoes rulemaking. A State may adopt its own SIL but usually relies on EPA's suggested SIL. The form of the SIL follows the form of its respective NAAQS, i.e., for probabilistic standards (including PM2.5) the SIL analysis is based on the maximum concentrations at each receptor averaged over the number of meteorological years modeled rather than the maximum at any receptor.

<sup>6</sup>For NO<sub>2</sub>, based on 5 year average of the 98th percentile of the annual distribution of the daily maximum 1-hour values at each receptor. (For SO<sub>2</sub> it is the 99th percentile). Concentrations at lower ranks must also meet the NAAQS (i.e., the 97th, 96th percentile). If there is 1 year of site specific data (up to 5 years), the averaging is based on the number of years of meteorological data.

<sup>7</sup>Guidance Concerning the Implementation of the 1-hour NO<sub>2</sub> NAAQS for the Prevention of Significant Deterioration Program (6/29/10): <http://www.epa.gov/region07/air/nsr/nsrmemos/appwno2.pdf>

Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> NAAQS (3/01/11): [http://www.epa.gov/ttn/scram/Additional\\_Clarifications\\_AppendixW\\_Hourly-NO2-NAQS\\_FINAL\\_03-01-2011.pdf](http://www.epa.gov/ttn/scram/Additional_Clarifications_AppendixW_Hourly-NO2-NAQS_FINAL_03-01-2011.pdf)

<sup>8</sup>Guidance Concerning the Implementation of the 1-hour SO<sub>2</sub> NAAQS for the Prevention of Significant Deterioration Program (08/23/10): <http://www.epa.gov/region07/air/nsr/nsrmemos/appwso2.pdf> (See also 3/01/11 memo for SO<sub>2</sub>; Note 7.)

<sup>9</sup>The existing annual & 24-hour SO<sub>2</sub> NAAQS will be revoked one year after the effective date in areas with a designated status for the revised SO<sub>2</sub> NAAQS, per 40 CFR 50.4(e). Their respective increments will remain in effect.

<sup>10</sup>The PM2.5 Increment, SILs and SMC values may be found in <http://edocket.access.gpo.gov/2010/pdf/2010-25132.pdf>

<sup>11</sup>On 03/23/10 EPA recommended that the modeled component of the PM2.5 NAAQS be shown using the average H-1-H rather than the design value of 98th percentile (<http://www.epa.gov/region07/air/nsr/nsrmemos/pm25memo.pdf>). Compliance with the annual PM2.5 NAAQS is also based on the average H-1-H. These recommendations are revisited in the 03/04/13 draft PM2.5 guidance provided that secondary formation is addressed. See NFR (10/17/06) in which the 24-h NAAQS was revised from 651g/m<sup>3</sup> to 351g/m<sup>3</sup>:

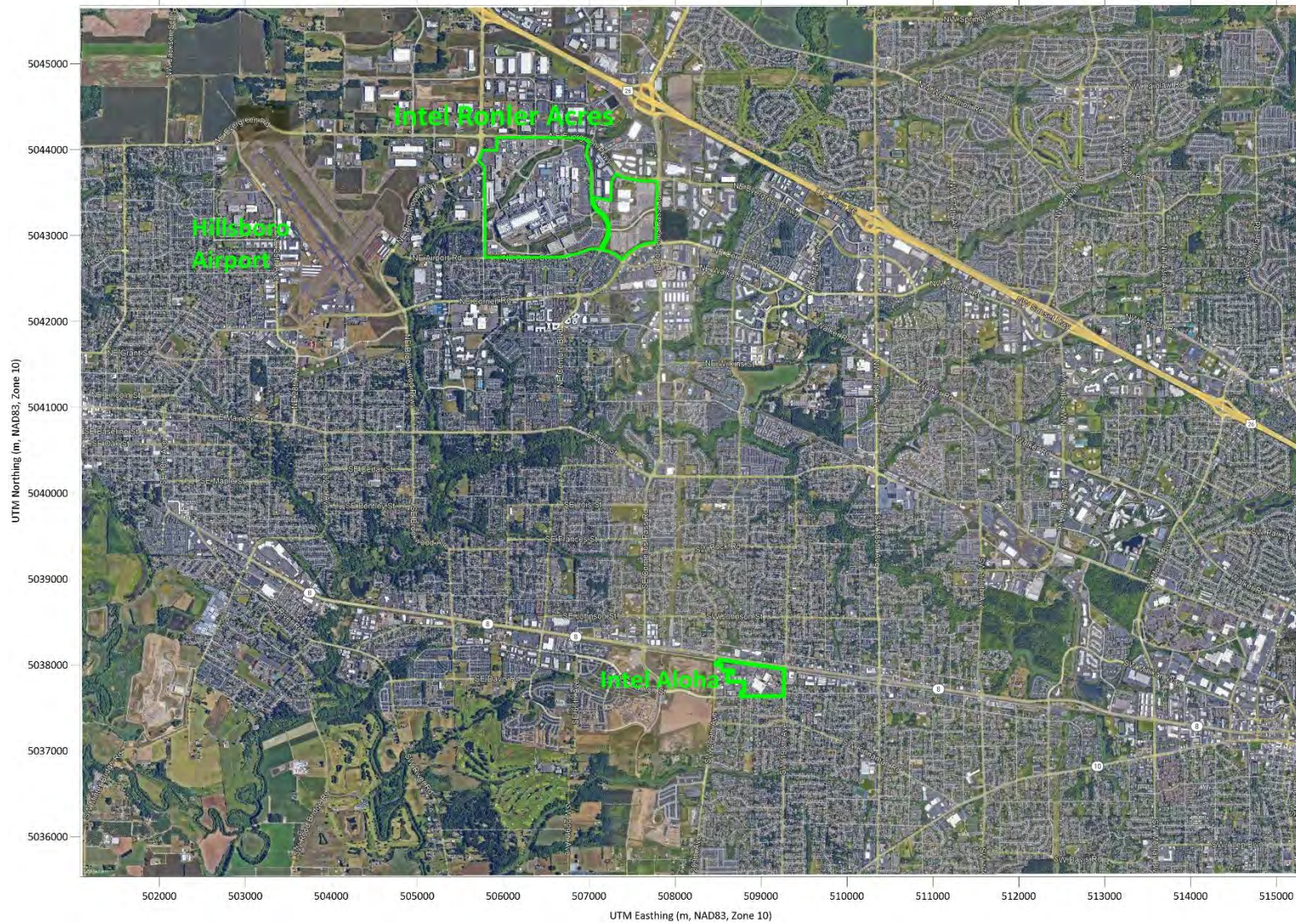
<http://www.gpo.gov/fdsys/pkg/FR-2006-10-17/pdf/06-8477.pdf>

<sup>12</sup>Form of PM10 NAAQS allows the standard to be exceeded once/year on average using the H-6-H value over 5 years. See Section 7.2.1.1 of App. W & p.4 of S. Page memo (03/23/10).

<sup>13</sup>The annual PM10 NAAQS of 501g/m<sup>3</sup> was revoked 17 October 2006 but the annual PM10 PSD increment remains in effect. See NFR (10/17/06): <http://www.gpo.gov/fdsys/pkg/FR-2006-10-17/pdf/06-8477.pdf>

# AIR QUALITY MODELING PROTOCOL

Figure 1  
Facility Location



# AIR QUALITY MODELING PROTOCOL

Figure 2  
Ronler Acres Site Plan



# AIR QUALITY MODELING PROTOCOL

Figure 3  
Aloha Site Plan



Figure 4  
Land Use Surrounding the Intel Sites (3 km Radius in Blue)

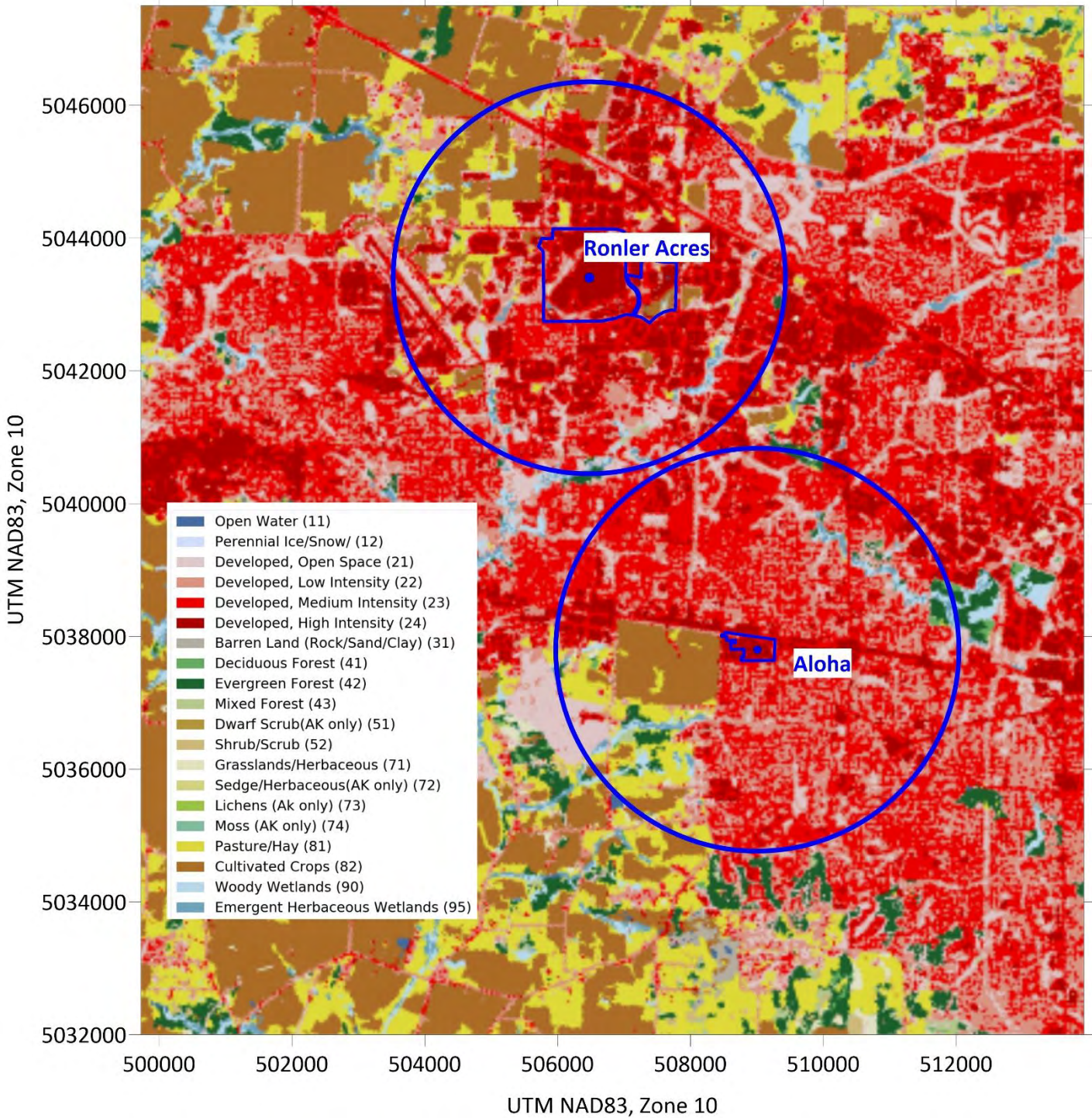


Figure 5  
Hillsboro Annual Wind Rose (2016-2020)

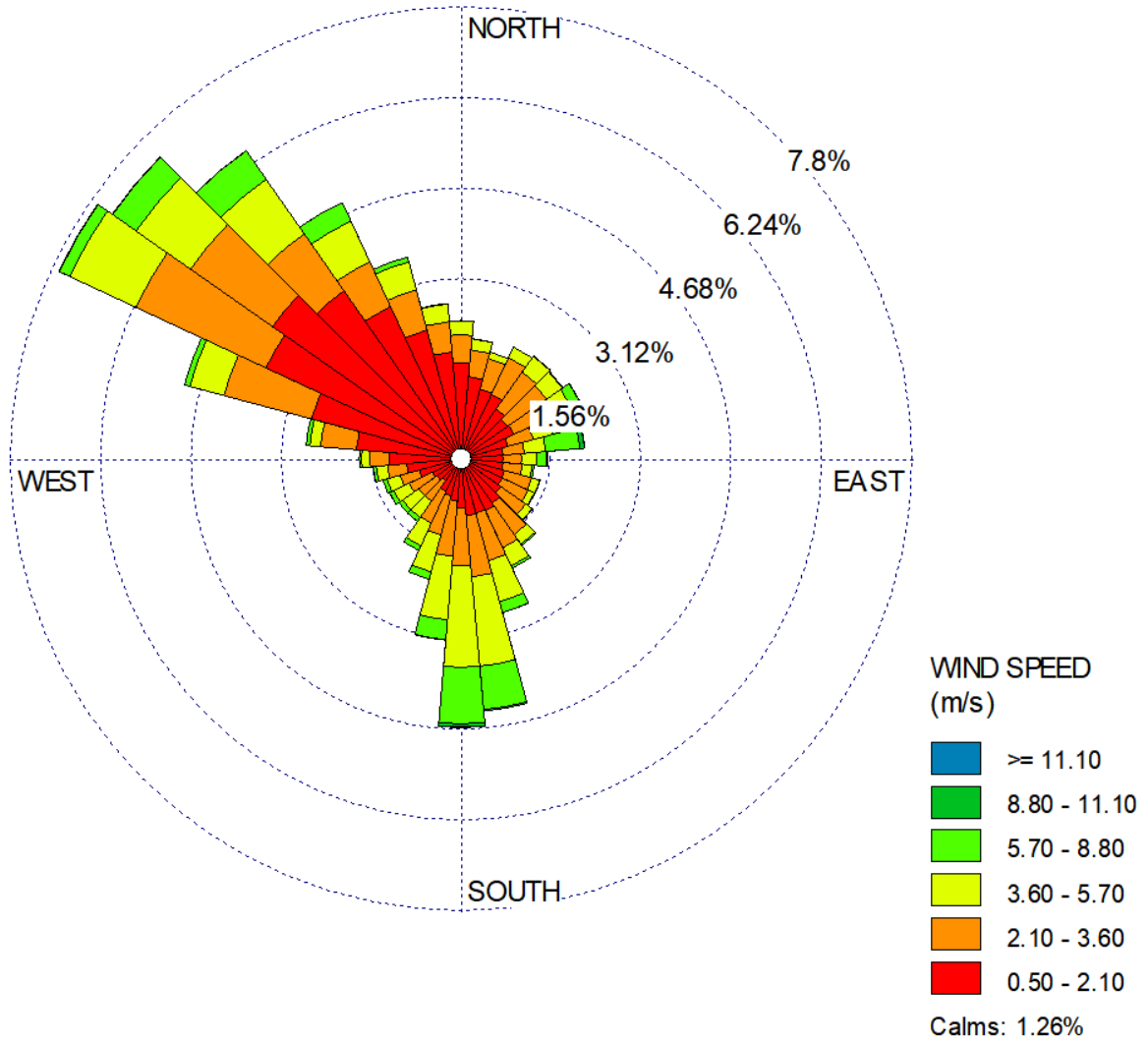


Figure 6  
Monte Carlo Simulation Flow

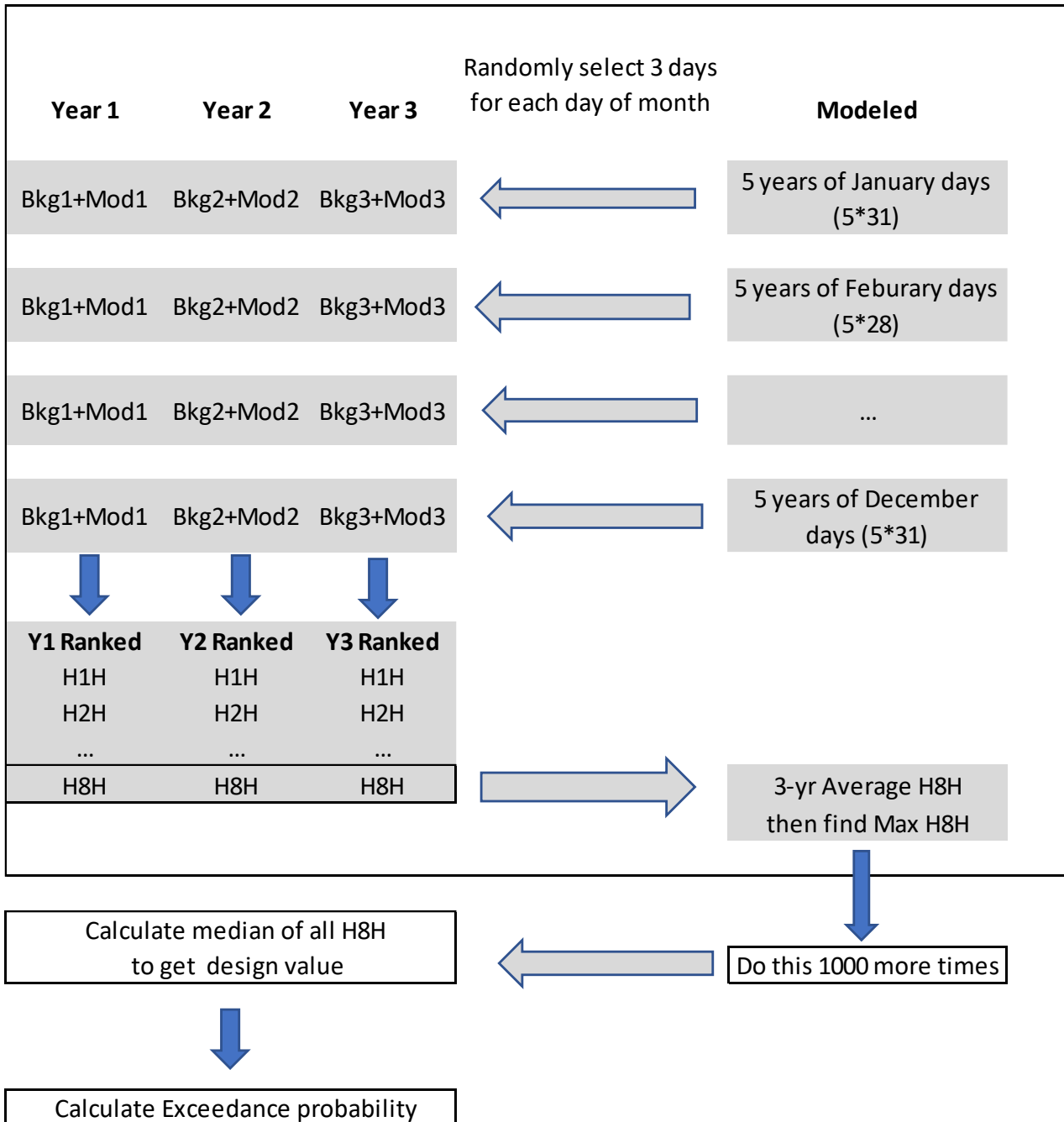
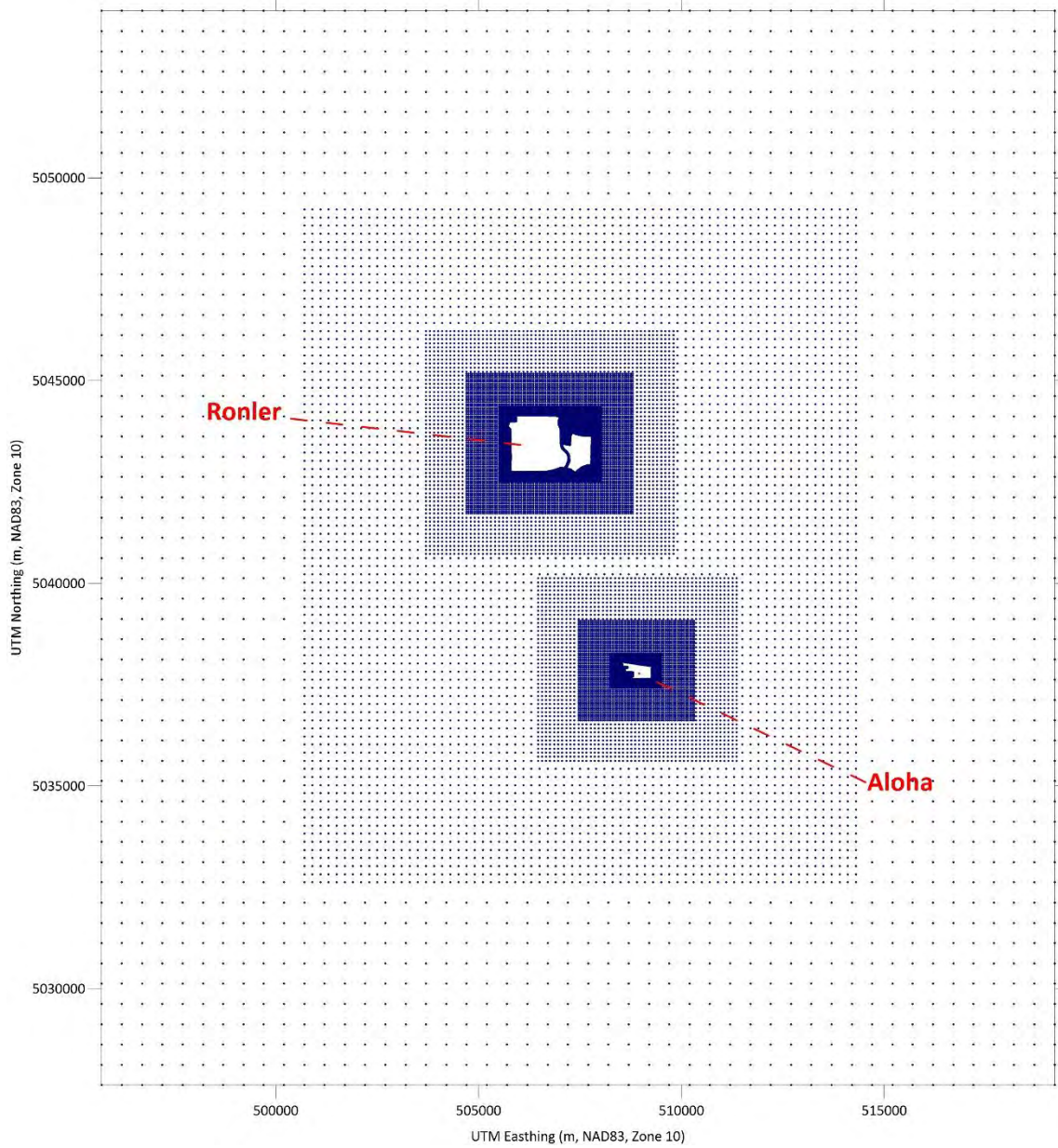


Figure 7  
Project Receptor Grids

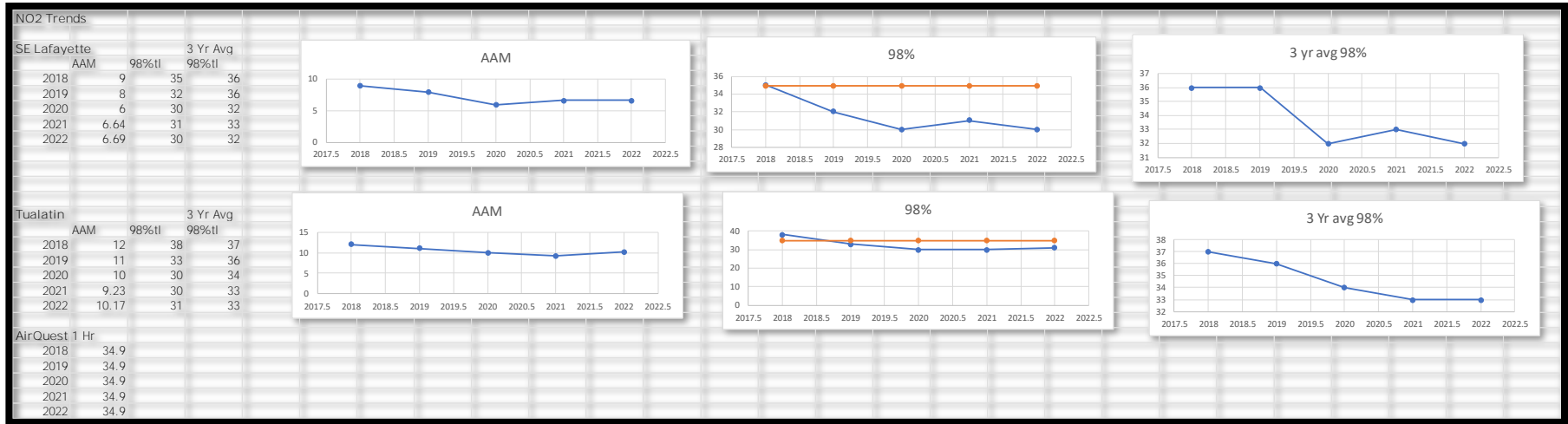






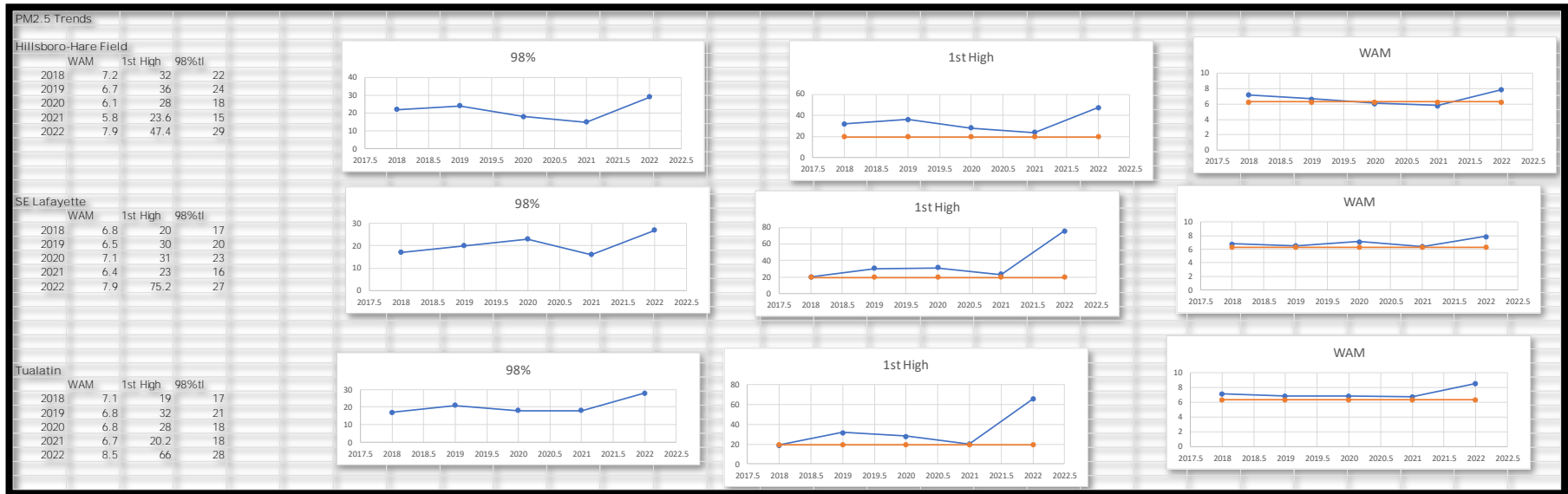
# AIR QUALITY MODELING PROTOCOL

**Figure 9**  
**NO<sub>2</sub> Monitoring Data Trends 2018-2022**



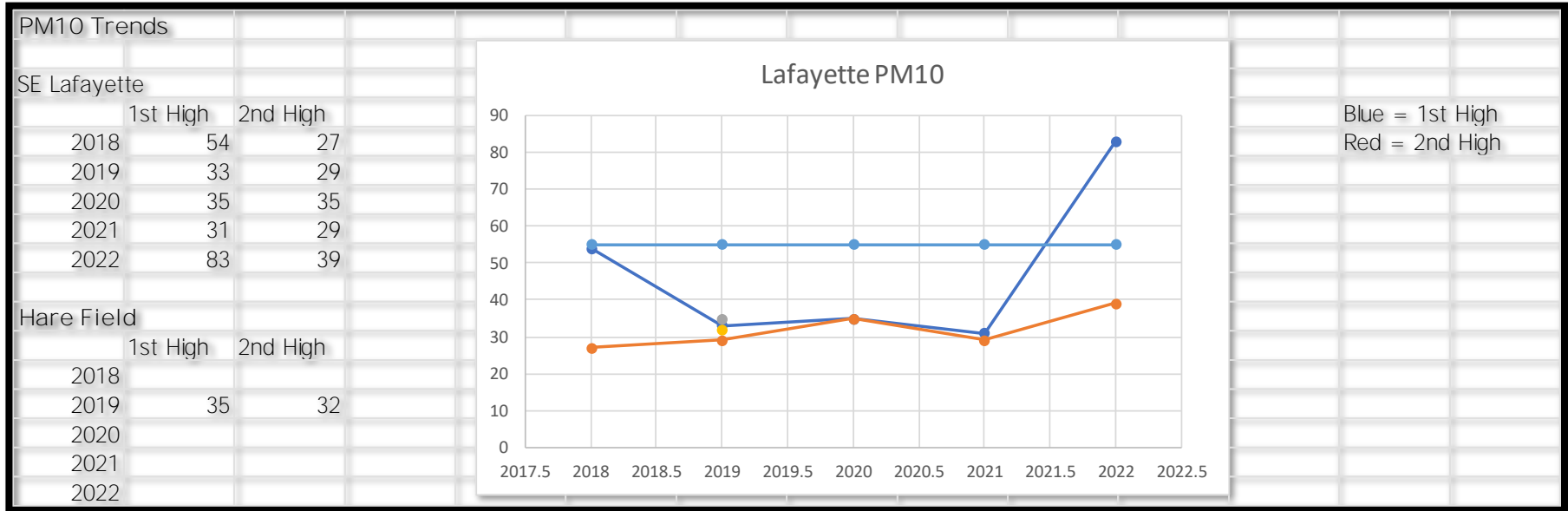
# AIR QUALITY MODELING PROTOCOL

**Figure 10**  
**PM2.5 Monitoring Data Trends 2018-2022**



# AIR QUALITY MODELING PROTOCOL

**Figure 11**  
**PM10 Monitoring Data Trends 2018-2022**





**ATMOSPHERIC DYNAMICS, INC**  
Meteorological & Air Quality Modeling

## Memorandum

To: Phil Allen/ Kristin Martin: ODEQ  
From: Greg Darvin: Atmospheric Dynamics  
Date: May 24, 2023

### **Subject: Clarification on the Urban Population Value Used in AERMOD**

Reviewing the AERMOD Implementation Guide (June 2022) provides the following recommendations for assigning an urban population number in AERMOD.

*For urban areas adjacent to or near other urban areas, or part of urban corridors, the user should attempt to identify that part of the urban area that will contribute to the urban heat island plume affecting the source(s). If this approach results in the identification of clearly defined MSAs, then census data may be used as above to determine the appropriate population for input to AERMOD. Use of population based on the Consolidated MSA (CMSA) for applications within urban corridors is not recommended, since this may tend to overstate the urban heat island effect. Similarly, for application sites that are in isolated areas of dense population but are not representative of the larger MSA, care should be taken to determine the extent of the area the urban area that will contribute to the urban heat island plume affecting the source(s).*

*For situations where MSAs cannot be clearly identified, the user may determine the extent of the area, including the source(s) of interest, where the population density exceeds 750 people per square kilometer. The combined population within this identified area may then be used for input to the AERMOD model.*

As you know, dispersion within urban environments has different characteristics than that occurring in a rural environment. The urban boundary layer will behave in a more convective, turbulent manner during the hours just after sunset due to the urban heat island effect.

I believe the use of the Hillsboro population of 107,299 (based on the 2020 US Census data) underrepresents the magnitude of the urban-rural temperature difference and urban heat island effect(s) within the impact areas near both project sites. For reference, the main Ronler campus is within the city of Hillsboro and the Aloha campus in the city of Aloha.

Using the Aloha project site as general center point, Figure 1 presents a map showing the project locations relative to the city boundaries in the region. The Aloha site is approximately 10 kilometers from the northwestern edge of the Hillsboro city boundary and nine (9) kilometers from the southeastern edge of the Beaverton city boundary. The three cities proposed for identifying the population are Hillsboro, Aloha and Beaverton. Each of the proposed cities vastly exceeds the 750 people per square kilometer threshold for identifying the area as urban. The three (3) cities also represent a continuous urban/developed



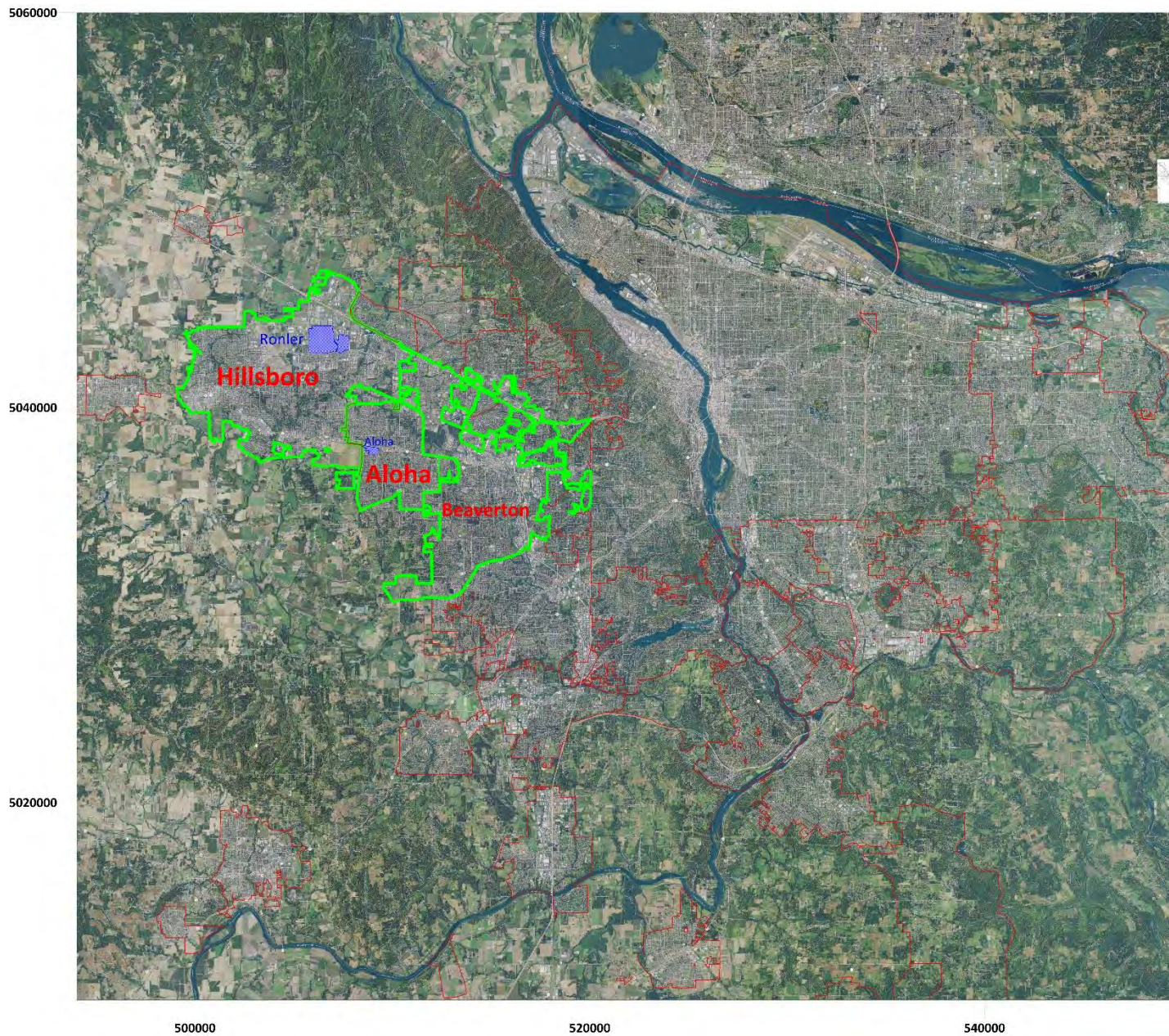
corridor which is aligned with the predominant wind direction. The use of the 2022 census derived population data and population density data are summarized in Table 1.

TABLE 1 EXISTING POPULATIONS AND POPULATION DENSITY		
	Population*	Population Density/km <sup>2</sup> *
Hillsboro	107,299	1,601.3
Aloha	58,828	2,825.3
Beaverton	97,053	1,920.2
Total	263,180	
* 2020 /2022 United States Census Bureau Data		

Based on the combined population of 263,180, this value is proposed to be used for the population input into AERMOD. This combined population would present a conservative and appropriate magnitude of the urban heat island effects within the impact areas surrounding both sites.



Figure 1 City Boundaries





**ATMOSPHERIC DYNAMICS, INC**  
 Meteorological & Air Quality Modeling

## Memorandum

To: Phil Allen/ Kristin Martin: ODEQ, Rick Graw: USFS  
 From: Greg Darvin: Atmospheric Dynamics  
 Date: June 2, 2023

### Subject: Clarification on the Q/D calculation procedures for the Class I Areas

**PSD Class I AQRV Analyses:** The Facility will be a federal major source for criteria pollutant emissions subject to PSD permitting requirements. PSD Class I Air Quality Related Value (AQRV) analyses, including visibility and nitrogen deposition may be required if determined from the screening procedure summarized below. The nearest Class I area is the Mount Hood National Forrest, operated by the U.S. Forest Service and is located approximately 80 kilometers (km) to the east. In total, nine (9) Class I areas are located within 300 km of the project.

Following the FLAG Workshop procedures (June 2010), the use of the Screening Procedure Q/D (Q is the total emissions in tons per year and D is the distance in kilometers to the Class I area) to determine if the project could screen out of a formal AQRV assessment for visibility and nitrogen deposition was made. Following these procedures in FLAG, Q is calculated as the sum (in tons/year) of emissions of NO<sub>x</sub>, H<sub>2</sub>SO<sub>4</sub> and PM<sub>10</sub> based on the maximum 24-hour net emissions increase for each pollutant from the proposed project. The actual baseline emissions were not included in the in the proposed increase, as per FLAG. There will be no increase in SO<sub>2</sub> emissions over the existing PSEL so this pollutant was not included in the calculation of Q. The existing PSEL emissions and the proposed hourly increases converted to tons are summarized in Table 1.

TABLE 1 EXISTING AND PROPOSED EMISSIONS PROFILES				
	NO <sub>x</sub> tpy	PM <sub>10</sub> Tpy	H <sub>2</sub> SO <sub>4</sub> tpy	Q tons
Current PSEL	197.0	35.0	0	-
Proposed Increase without Emergency Generators	226.0*	27.5*	0.93*	-
Proposed Increase Emergency Generators Only (worst-case day)	124.1*	10.24*	-	-
Total for Q/D Calculation	350.10	37.74	0.93	388.77
Total PTE	423.0	62.5	0.93	
* Based on worst case day multiplied by 365 days and converted to tons per year				





While most of the sources are steady state and operate almost continuously 24-hours per day, the emergency diesel generators are limited to 30 hours per year, with no more than 10 engines being tested during any day. To determine the worst-case daily emissions for the emergency generators, the 10 highest emitting engines' emissions were summed to calculate a pound per day (lb/day) emission rate. This was then multiplied by 365 days and converted to tons per year (tpy) to calculate the engines contribution to the total emissions (Q). The emergency diesel generators do not emit H<sub>2</sub>SO<sub>4</sub>. As an example, for NO<sub>x</sub>:

Each emergency generators at 68 lb/hr each or 10 engines on a daily basis at 680 lb/day  
 $680 \text{ lb/day} * 365 \text{ day/yr} * 1 \text{ ton}/2000 \text{ lb} = 124.1 \text{ tpy}$

This is repeated for PM10 but with a different set of 10 engines which have a higher PM10 emission rate.

Each emergency generators at 5.61 lb/hr each or 10 engines on a daily basis at 56.1 lb/day  
 $56.1 \text{ lb/day} * 365 \text{ day/yr} * 1 \text{ ton}/2000 \text{ lb} = 10.24 \text{ tpy}$

Using this procedure on the emergency generators which is then added to the steady state Q, the total facility Q based on the increase in NO<sub>x</sub>, PM10 and H<sub>2</sub>O<sub>4</sub> is:

$Q = \text{sum} (\text{NO}_x + \text{PM10} + \text{H}_2\text{SO}_4) \text{ in maximum lbs/day (for the worst-case day including emergency generators)} * 365 \text{ days/year} * 1 \text{ ton}/2000 \text{ lbs} = 388.77 \text{ tons}$

The results of the Q/D scenarios are presented in Table 2. If Q/D is less than 10, then no AQRV analysis is required, as shown above for the nearest Class I area. Based on the ratio of Q/D, there are no Class I areas that have a Q/D of greater than 10. Therefore, the FLM's can exempt the projects impacts on AQRVs for visibility or nitrogen deposition in these areas. There are no exemptions for Class I SILs and NAAQS, which will be assessed as applicable.

TABLE 2 NEARBY CLASS I AREAS AND Q/D SCREENING RESULTS		
Class I Areas	Minimum Distance (km)	Q/D*
Mt Hood OR (MOHO)	80	4.9
Mt Jefferson OR (MOJE)	116	3.4
Mt Adams WA (MOAD)	121	3.2
Goat Rocks WA (GORO)	145	2.7
Mt Washington WA (MOWA)	150	2.6
Mt Rainier WA (MORA)	153	2.5
Three Sisters OR (THSI)	167	2.3
Diamond Creek (DC)	223	1.7
Crater Lake (CR)	279	1.4
*Q/D based on worst case day.		





**ATMOSPHERIC DYNAMICS, INC**  
Meteorological & Air Quality Modeling

## Memorandum

To: Phil Allen/ Kristin Martin: ODEQ  
From: Greg Darvin: Atmospheric Dynamics, Inc.  
Date: June 14, 2023

### **Subject: Clarification on the 1-Hour NO<sub>2</sub> Intermittent Source Modeling Approach**

As outlined in USEPA guidance documents (March 1, 2011, USEPA memorandum “Additional Clarification Regarding Application of Appendix W Modeling Guidance for the 1-hour NO<sub>2</sub> National Ambient Air Quality Standard”), the project will also include intermittent sources comprised of emergency diesel generators and fire pumps in the 1-hour NO<sub>2</sub> modeling assessments. Since the engines would each be tested far less than 100 hours/year (limited to 25 hours per year per engine, except for the fire pump engines which are tested 50 hours per year), the annual average emission rate was modeled for the 1-hour NO<sub>2</sub> NAAQS modeling analyses per EPA guidance due to the statistical nature of these standards. For CO, PM<sub>10</sub>, and PM<sub>2.5</sub>, the maximum hourly emission rates will be used.

The current permit limits the testing to no more than 10 engines per day. In order to determine which group of engines would present the worst-case potential 1-hour NO<sub>2</sub> impact, an air quality screening analysis will be performed to determine which group of engines would produce the maximum 98<sup>th</sup> percentile concentration. This screening assessment will use the NO<sub>2</sub> annualized emission rates. All the engine emissions will be based upon 100% load, with specific source groups identified for each group of engines that are tested during any one (1) hour. The engines can only be tested between 8 AM to 6 PM (controlled using the EMISFACT/HROFDY model option).

The results of the engine screening analysis will be used to input the appropriate groups of diesel engines into the final modeling assessments. The use of the EPA methodology is in addition to the use of the Monte Carlo approach for determining 1-hour NO<sub>2</sub> project-based concentrations.





June 16, 2023

Wes Lund  
RS5 M/S 115  
Intel Corporation  
5200 NE Elam Young Parkway  
Hillsboro, OR 97124

Mr. Lund,

DEQ has completed the review of the modeling protocols (the Protocol) for the proposed expansion of operations at the Intel Corporation Ronler Acres and Aloha facilities located near Hillsboro, Oregon. These protocols, which were submitted by the modeling consultant Atmospheric Dynamics, Inc. on behalf of the Intel, include 1) the modeling protocol (4/26/2023), 2) the memorandum “Clarification on the Q/d calculation procedures for the Class I Areas” (6/2/2023), and 3) the memorandum “Modeling intermittent sources using annual emission rates” (6/14/2023).

DEQ approves the Protocol with the following comments that can be addressed, as necessary, in the final modeling report.

1. The modeling protocol as submitted did not include specific emissions units, emission estimates, or stack parameters. DEQ understands this information will be provided in the modeling report. When emission estimates, units, and stack parameters are provided in the report, DEQ may have additional comments that could affect the modeling results, and DEQ’s approval of the air quality analysis.
2. For the NO<sub>2</sub> model employing ARM2, the default upper and lower limits on the ambient ratio should be 0.9 and 0.5, respectively, as outlined in section 3.3.6.3 of the AERMOD User’s Guide. The original protocol (4/26/2023) incorrectly notes the national default conversion rate of 75% for annual and 80% for 1-hour.
3. For the 1-hour NO<sub>2</sub> modeling of nearby competing sources, annualize emissions based on the emission inventory previously provided by DEQ, should be used where specified by DEQ in this letter.
4. As confirmed in a discussion with the modeling consultant, AERSURFACE version 20060, utilizing the 2016 National Land Cover Dataset, including tree canopy and impervious geotiff files, will be used.
5. In order to meet the EPA requirements for modeling 1-hour NO<sub>2</sub> intermittent emission sources, the method as described in the modeling memorandum (6/14/2023) will be followed. Specifically, this method uses annualized emissions from a “worst case” group of engines, previously identified in a screening analysis. Additionally, the ARM2 method should be used for all sources and a competing source inventory should be included, as noted in items 2 and 3, respectively. The description of the modeling and the results using these annualized emissions will be presented in the body of the modeling report.
6. In order to meet DEQ requirements for modeling 1-hour NO<sub>2</sub> intermittent emission sources, the Monte Carlo method, as described in the original modeling protocol (4/26/2023), will be followed. As noted in

the original protocol, this method may utilize the PVMMR method for intermittent sources and does not need to include a competing source inventory. The description of the analysis and results using the Monte Carlo approach will be included in an addendum to the modeling report that will be submitted along with the report.

7. Regarding the 1-hour NO<sub>2</sub> Monte Carlo addendum, DEQ recommends adding a convergence discussion showing the number of iterations needed to achieve convergence of the maximum median 98th percentile of max daily values.
8. In accordance with OAR 340-225-0070, the Federal Land Managers (FLMs) of Class I areas potentially affected by the project have been notified by DEQ of the pending permit application. In their responses, the U.S Forest Service and the National Park Service, as FLMs, have both stated that a detailed analysis of Air Quality Related Values (AQRVs) is not required for their respective Class I areas and the Columbia River Gorge Scenic Area.
9. Although an analysis of AQRV impacts is not required at this time, additional analysis of contributions to regional haze from the Intel project will be required when DEQ conducts a comprehensive revision of the State Regional Haze Plan that is required by EPA no later than 2028 (Round 3 of Regional Haze). The details of this analysis are not yet fully developed, but in anticipation of future emission reduction requirements as part of the Regional Haze Plan, DEQ strongly encourages that NO<sub>x</sub> emissions be reduced for this proposed permitting action to the greatest extent feasible.
10. A copy of the modeling protocol (4/26/2023) and the Q/d clarification memorandum (6/2/2023) were provided to Jay McAlpine, EPA Region 10 Modeling Coordinator. His comments, and additional input from the EPA Office of Air Quality Planning and Standards (OAQPS), are addressed in this approval letter.
11. If during the modeling and preparation for the final Modeling Report, Intel proposes to make changes in the procedures or data as described in the Protocol, please notify DEQ as soon as practicable. This will facilitate timely review of the Modeling Report.

If you have questions about this approval letter, please contact us.

Sincerely,

Philip Allen  
DEQ Air Quality Modeler

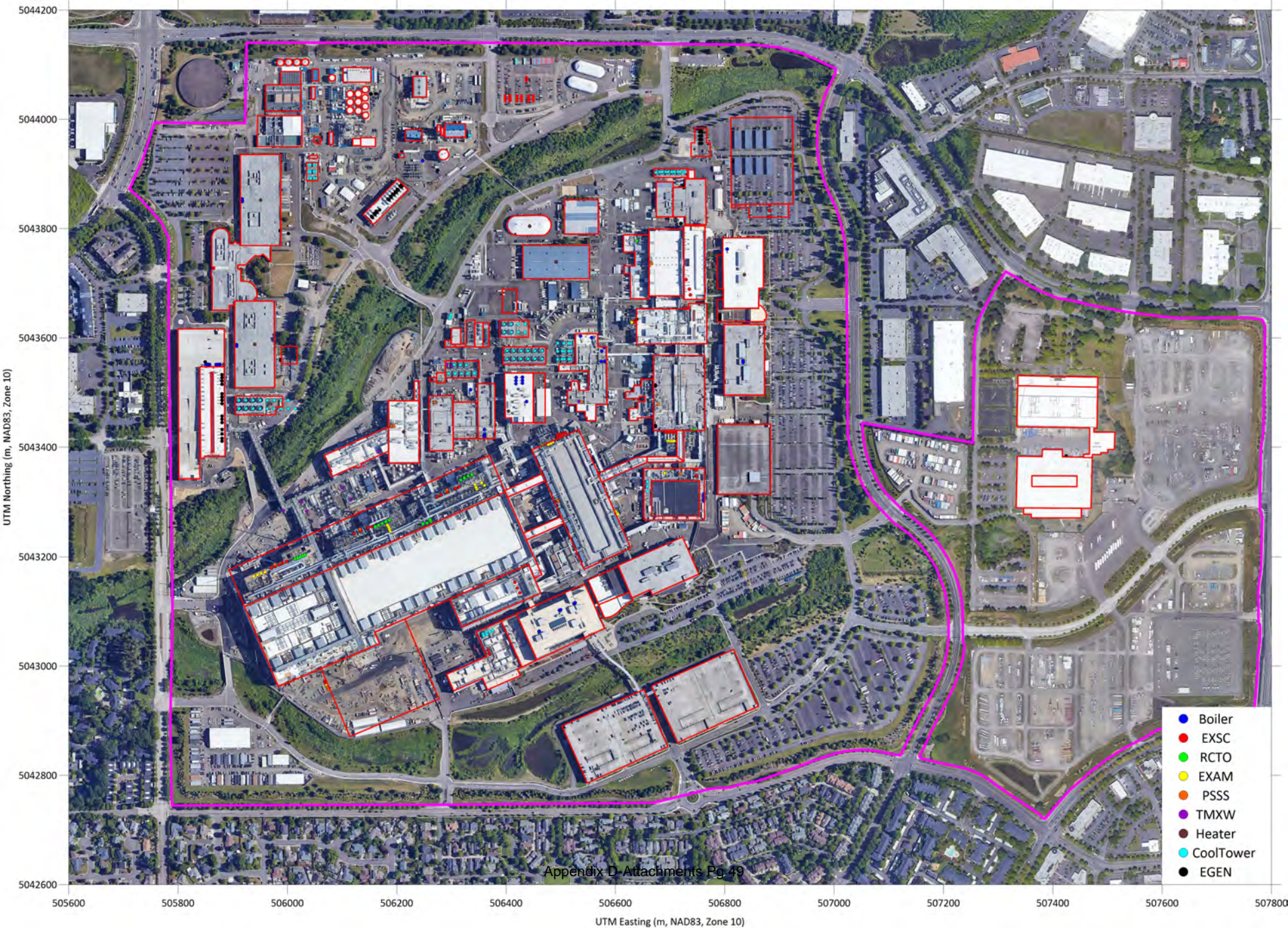
Kristen Martin  
DEQ Senior Air Quality Modeler

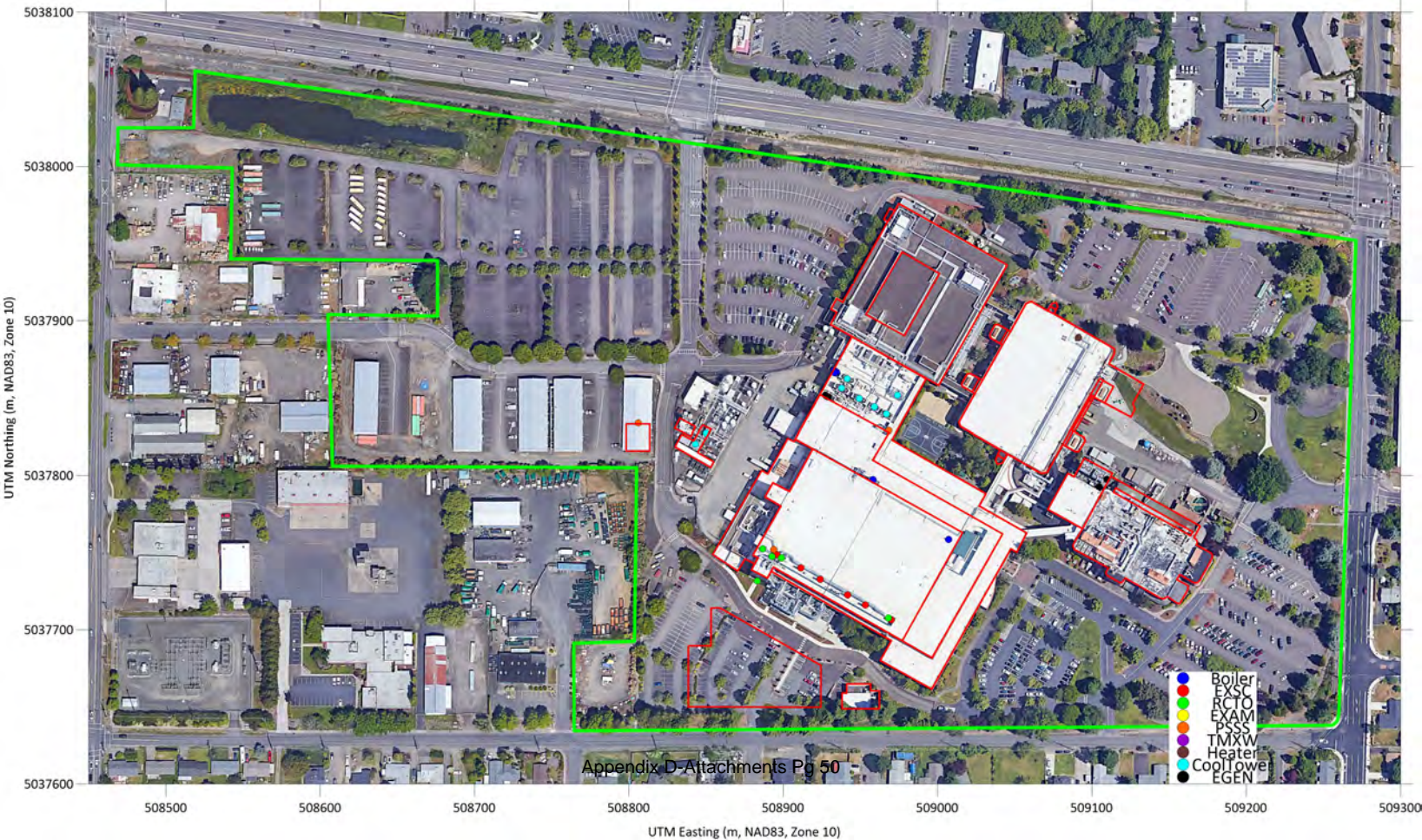
Cc: Ali Mirzakhali  
Nina DeConcini  
George Davis  
Josh Alexander  
Gregory Darvin, Atmospheric Dynamics, Inc.

# Attachment B

## Source Data Used in the Modeling Assessment







Intel Corporation - Stack Information

Equipment Type	Equipment ID	Stack ID	Stack Height			Stack Diameter		Adjusted Stack Flow Rate		Stack Velocity		Stack Temperature		NOx		CO		PM		PM10		PM2.5		SO2				
			UTM Easting	UTM Northing	Elevation (m)	(ft)	(m)	(ft)	(m)	(ft <sup>3</sup> /min)	(m <sup>3</sup> /s)	(ft/min)	(ft/s)	(m/s)	(°F)	(K)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)
Boiler	F20-BLR115-1-200	BOC1_01	506743.17	5043806.7	62.70	99.00	30.18	2.67	0.81	6,266.76	2.96	1,122.06	18.70	5.70	210.00	372.04	3.40E-01	4.47E-01	1.15E+00	1.51E+00	7.72E-02	1.01E-01	1.61E-02	2.11E-02	1.33E-02	1.74E-02	8.03E-02	1.06E-01
Boiler	F20-BLR115-2-200	BOC1_02	506745.67	5043806.7	62.70	99.00	30.18	2.67	0.81	6,266.76	2.96	1,122.06	18.70	5.70	210.00	372.04	3.40E-01	4.47E-01	1.15E+00	1.51E+00	7.72E-02	1.01E-01	1.61E-02	2.11E-02	1.33E-02	1.74E-02	8.03E-02	1.06E-01
Boiler	F20-BLR115-3-200	BOC1_03	506748.17	5043806.7	62.70	99.00	30.18	2.67	0.81	6,266.76	2.96	1,122.06	18.70	5.70	210.00	372.04	3.40E-01	4.47E-01	1.15E+00	1.51E+00	7.72E-02	1.01E-01	1.61E-02	2.11E-02	1.33E-02	1.74E-02	8.03E-02	1.06E-01
Boiler	F20-BLR115-4-200	BOC1_04	506750.67	5043806.7	62.70	99.00	30.18	2.00	0.61	6,241.00	2.95	1,986.57	33.11	10.09	210.00	372.04	3.31E-01	4.35E-01	1.12E+00	1.47E+00	7.50E-02	9.86E-02	1.56E-02	2.05E-02	1.29E-02	1.70E-02	7.80E-02	1.03E-01
Boiler	F20-BLR115-5-200	BOC1_05	506753.17	5043806.7	62.70	99.00	30.18	2.00	0.61	6,241.00	2.95	1,986.57	33.11	10.09	350.00	449.82	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	RA1-MECH-B01	BOR1_01	506843.5	5043630.5	62.70	95.00	28.96	0.67	0.20	223.81	0.11	641.18	10.69	3.26	210.00	372.04	7.06E-02	9.28E-02	5.93E-02	7.79E-02	1.76E-03	2.32E-03	3.67E-04	4.82E-04	3.04E-04	3.99E-04	1.84E-03	2.41E-03
Boiler	RA1-MECH-B02	BOR1_02	506804.48	5043762.9	62.70	95.00	28.96	0.50	0.15	223.81	0.11	1,139.87	19.00	5.79	210.00	372.04	9.80E-02	1.29E-01	8.24E-02	1.08E-01	2.45E-03	3.22E-03	5.10E-04	6.70E-04	4.22E-04	5.54E-04	2.55E-03	3.35E-03
Boiler	CUB2-BLR115-1-210	BOC2_01	506579.98	5043557.1	62.70	45.00	13.72	2.67	0.81	2,557.86	1.21	457.98	7.63	2.33	210.00	372.04	3.47E-01	4.56E-01	1.17E+00	1.54E+00	7.87E-02	1.03E-01	1.64E-02	2.15E-02	1.35E-02	1.78E-02	8.19E-02	1.08E-01
Boiler	CUB2-BLR115-2-210	BOC2_02	506579.22	5043582.7	62.70	45.00	13.72	2.67	0.81	2,557.86	1.21	457.98	7.63	2.33	210.00	372.04	3.47E-01	4.56E-01	1.17E+00	1.54E+00	7.87E-02	1.03E-01	1.64E-02	2.15E-02	1.35E-02	1.78E-02	8.19E-02	1.08E-01
Boiler	CUB2-BLR115-3-210	BOC2_03	506574.1	5043556.8	62.70	45.00	13.72	2.67	0.81	2,557.86	1.21	457.98	7.63	2.33	210.00	372.04	3.47E-01	4.56E-01	1.17E+00	1.54E+00	7.87E-02	1.03E-01	1.64E-02	2.15E-02	1.35E-02	1.78E-02	8.19E-02	1.08E-01
Boiler	CUB2-BLR115-4-210	BOC2_04	506575	5043575.9	62.70	45.00	13.72	2.67	0.81	2,557.86	1.21	457.98	7.63	2.33	210.00	372.04	3.53E-01	4.64E-01	1.19E+00	1.57E+00	8.00E-02	1.05E-01	1.66E-02	2.19E-02	1.38E-02	1.81E-02	8.32E-02	1.09E-01
Boiler	CUB2-BLR115-5-210	BOC2_05	506536.08	5043603.2	62.70	45.00	13.72	2.00	0.61	6,241.00	2.95	1,986.57	33.11	10.09	210.00	372.04	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	CUB2-BLR115-6-210	BOC2_06	506556.51	5043600.4	62.70	45.00	13.72	2.00	0.61	6,241.00	2.95	1,986.57	33.11	10.09	210.00	372.04	3.31E-01	4.35E-01	1.12E+00	1.47E+00	7.50E-02	9.86E-02	1.56E-02	2.05E-02	1.29E-02	1.70E-02	7.80E-02	1.03E-01
Boiler	RA4-BLR152-2-30	BOR4_01	506497.72	5043102.2	62.70	121.06	36.90	0.67	0.20	270.58	0.13	775.15	12.92	3.94	350.00	449.82	1.96E-01	2.58E-01	1.65E-01	2.16E-01	4.90E-03	6.44E-03	1.02E-03	1.34E-03	8.43E-04	1.11E-03	5.10E-03	6.70E-03
Boiler	RA4-BLR152-1-30	BOR4_02	506500.12	5043103	62.70	121.06	36.90	0.67	0.20	270.58	0.13	775.15	12.92	3.94	350.00	449.82	1.96E-01	2.58E-01	1.65E-01	2.16E-01	4.90E-03	6.44E-03	1.02E-03	1.34E-03	8.43E-04	1.11E-03	5.10E-03	6.70E-03
Boiler	RA4-BLR117-2-30	BOR4_03	506524.09	5043114.7	62.70	132.00	40.23	1.00	0.30	1,771.91	0.84	2,256.07	37.60	11.46	350.00	449.82	1.96E-01	2.58E-01	1.65E-01	2.16E-01	4.90E-03	6.44E-03	1.02E-03	1.34E-03	8.43E-04	1.11E-03	5.10E-03	6.70E-03
Boiler	RA4-BLR117-1-30	BOR4_04	506526.12	5043116.1	62.70	132.00	40.23	1.00	0.30	1,771.91	0.84	2,256.07	37.60	11.46	350.00	449.82	1.96E-01	2.58E-01	1.65E-01	2.16E-01	4.90E-03	6.44E-03	1.02E-03	1.34E-03	8.43E-04	1.11E-03	5.10E-03	6.70E-03
Boiler	RA4-BLR117-3-30	BOR4_05	506460.1	5043063.7	62.70	132.00	40.23	2.00	0.61	6,594.41	3.11	2,099.07	34.98	10.66	350.00	449.82	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	RA4-BLR117-4-30	BOR4_06	506460.94	5043063.7	62.70	132.00	40.23	2.00	0.61	6,594.41	3.11	2,099.07	34.98	10.66	350.00	449.82	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	BLR-115-1-210	BOC3_01	506360.1	5043421.3	62.70	51.00	15.54	1.50	0.46	870.44	0.41	492.57	8.21	2.50	300.00	422.04	4.90E-01	6.44E-01	2.98E-01	3.92E-01	2.00E-02	2.63E-02	4.15E-03	5.47E-03	3.44E-03	4.52E-03	2.08E-02	2.73E-02
Boiler	BLR-115-2-210	BOC3_02	506360.1	5043423.2	62.70	51.00	15.54	2.67	0.81	3,481.75	1.64	623.40	10.39	3.17	300.00	422.04	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	BLR-115-3-210	BOC3_03	506360.3	5043432.1	62.70	51.00	15.54	2.67	0.81	3,481.75	1.64	623.40	10.39	3.17	300.00	422.04	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	BLR-115-4-210	BOC3_04	506359.8	5043418.4	62.70	51.00	15.54	2.67	0.81	1,523.26	0.72	272.74	4.55	1.39	300.00	422.04	3.53E-01	4.64E-01	1.19E+00	1.57E+00	8.00E-02	1.05E-01	1.66E-02	2.19E-02	1.38E-02	1.81E-02	8.32E-02	1.09E-01
Boiler	BLR-115-5-210	BOC3_05	506360.1	5043419.9	62.70	51.00	15.54	2.00	0.61	2,200.75	1.04	700.52	11.68	3.56	300.00	422.04	5.15E-01	6.76E-01	5.22E-01	6.86E-01	3.50E-02	4.60E-02	7.28E-03	9.57E-03	6.02E-03	7.91E-03	3.64E-02	4.79E-02
Boiler	BLR-115-6-210	BOC3_06	506334.9	5043505.4	62.70	51.00	15.54	2.00	0.61	2,200.75	1.04	700.52	11.68	3.56	300.00	422.04	3.18E-01	4.17E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	RP1-BLR115-1-210	BORP1_01	506762	5043315.3	62.70	42.00	12.80	1.67	0.51	1,303.38	0.62	597.43	9.96	3.03	294.00	418.71	1.50E-01	1.97E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	RP1-BLR115-2-210	BORP1_02	506762	5043311.1	62.70	42.00	12.80	1.67	0.51	1,303.38	0.62	597.43	9.96	3.03	294.00	418.71	1.32E-01	1.74E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	RP1-BLR115-3-210	BORP1_03	506762	5043307	62.70	42.00	12.80	1.67	0.51	1,303.38	0.62	597.43	9.96	3.03	294.00	418.71	1.32E-01	1.74E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	RP1-BLR115-4-210	BORP1_04	506762	5043302.8	62.70	42.00	12.80	1.67	0.51	454.57	0.21	208.36	3.47	1.06	350.00	449.82	1.27E-01	1.66E-01	1.07E+00	1.41E+00	7.20E-02	9.47E-02	1.50E-02	1.97E-02	1.24E-02	1.63E-02	7.49E-02	9.84E-02
Boiler	CUB4-BLR115-1-10	BOC4_01	506418.13	5043522	62.70	86.50	26.37	1.67	0.51	4,645.00	2.19	2,129.11	35.49	10.82	350.00	449.82	1.54E-01	2.03E-01	5.22E-01	6.86E-01	3.50E-02	4.60E-02	7.28E-03	9.57E-03	6.02E-03	7.91E-03	3.64E-02	4.79E-02
Boiler	CUB4-BLR115-2-10	BOC4_02	506418.4	5043527.6	62.70	86.50	26.37	2.00	0.61	8,530.00	4.03	2,715.18	45.25	13.79	350.00	449.82	3.31E-01	4.35E-01	1.12E+00	1.47E+00	7.50E-02	9.86E-02	1.56E-02	2.05E-02	1.29E-02	1.70E-02	7.80E-02	1.03E-01
Boiler	CUB4-BLR115-3-10	BOC4_03	506429.87	5043517.1	62.70	86.50	26.37	2.00	0.61	8,530.00	4.03	2,715.18	45.25	13.79	350.00	449.82	3.31E-01	4.35E-										





Intel Corporation - Stack Information

Equipment Type	Equipment ID	Stack ID	UTM Easting	UTM Northing	Elevation (m)	Stack Height		Stack Diameter		Adjusted Stack Flow Rate		Stack Velocity		Stack Temperature		NOx		CO		PM		PM <sub>10</sub>		PM <sub>2.5</sub>		SO <sub>2</sub>			
						(ft)	(m)	(ft)	(m)	(ft <sup>3</sup> /min)	(m <sup>3</sup> /s)	(ft/min)	(ft/s)	(m/s)	(°F)	(K)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)	(tpy)	(lb/hr)
EXAM	Combined Modeling Stack	AMM4_03	506074.19	5042959.7	62.70	129.99	39.62	6.17	1.88	28,500.00	13.45	954.23	15.90	4.85	64.99	291.48	1.65E+01	6.03E-01	3.10E-01	1.13E+00	7.94E-02	3.48E-01	3.41E-02	1.27E-01	3.15E-02	1.15E-01	2.94E-03	1.07E-02	
HEATER	RA3 Combined Modeling Stack	HER3_M	506679.8	5043176.5	62.70	82.00	24.99	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	1.56E+00	3.42E+00	1.31E+00	5.38E+00	3.90E-02	8.55E-02	3.90E-02	8.55E-02	3.90E-02	8.55E-02	4.06E-02	8.89E-02	
HEATER	RS4 Combined Modeling Stack	HERS4_M	505951	5043852.3	62.70	60.00	18.29	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	4.03E-01	8.82E-01	3.38E-01	1.48E+00	1.01E-02	2.21E-02	1.01E-02	2.21E-02	1.01E-02	2.21E-02	1.05E-02	2.29E-02	
HEATER	RS5 Combined Modeling Stack	HERS5_M	505915.2	5043725.7	62.70	60.00	18.29	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	7.25E-01	1.59E+00	6.09E-01	2.67E+00	1.81E-02	3.97E-02	1.81E-02	3.97E-02	1.81E-02	3.97E-02	1.89E-02	4.13E-02	
HEATER	RS6 Combined Modeling Stack	HERS6_M	505939.9	5043588.1	62.70	60.00	18.29	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	3.09E-01	6.76E-01	2.59E-01	1.14E+00	7.72E-03	1.69E-02	7.72E-03	1.69E-02	7.72E-03	1.69E-02	8.03E-03	1.76E-02	
HEATER	Lunch Tent Combined Modeling Stack	HELT4_M	506443.2	5043804.3	62.70	41.00	12.50	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	2.81E-01	6.15E-01	2.36E-01	1.03E+00	7.02E-03	1.54E-02	7.02E-03	1.54E-02	7.02E-03	1.54E-02	7.30E-03	1.60E-02	
HEATER	Aloha Combined Modeling Stack	HEAL_M	509091.1	5037889	69.40	46.00	14.02	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	2.88E-01	6.31E-01	2.42E-01	1.06E+00	7.21E-03	1.58E-02	7.21E-03	1.58E-02	7.21E-03	1.58E-02	7.50E-03	1.64E-02	
HEATER	RS2 Combined Modeling Stack	HERS2_M	506491.4	5043738.9	62.70	43.00	13.11	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	3.14E-01	6.87E-01	2.64E-01	1.15E+00	7.84E-03	1.72E-02	7.84E-03	1.72E-02	7.84E-03	1.72E-02	8.16E-03	1.79E-02	
HEATER	RA1 Combined Modeling Stack	HERA1_M	506835.9	5043715.5	62.70	54.00	16.46	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	1.47E-02	3.22E-02	1.24E-02	5.41E-02	3.68E-04	8.05E-04	3.68E-04	8.05E-04	3.68E-04	8.05E-04	3.82E-04	8.37E-04	
HEATER	CUB 4 Heater	HEC4_M	506404.21	5043465.8	62.70	79.00	24.08	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	2.94E-02	6.44E-02	2.47E-02	1.08E-01	7.35E-04	1.61E-03	7.35E-04	1.61E-03	7.35E-04	1.61E-03	7.65E-04	1.67E-03	
HEATER	PUB1 Heater	HEPB1_M	506212.9	5043427.9	62.70	104.00	31.70	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	1.47E-01	3.22E-01	1.24E-01	5.41E-01	3.68E-03	8.05E-03	3.68E-03	8.05E-03	3.68E-03	8.05E-03	3.82E-03	8.37E-03	
HEATER	CUB 5 Heater	HEC5_M	505862	5043464.8	62.70	73.50	22.40	0.50	0.15	193.25	0.09	984.23	16.40	5.00	300.00	422.04	1.47E-01	3.22E-01	1.24E-01	5.41E-01	3.68E-03	8.05E-03	3.68E-03	8.05E-03	3.68E-03	8.05E-03	3.82E-03	8.37E-03	
TMXW	CUB3 - OX293-0-70	TMXW_01	506292.12	5043551.6	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	PUB1A-OX293-0-70	TMXW_02	506166.41	5043393	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	PUB1B-OX293-0-70	TMXW_03	506100.6	5043326.9	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	PUB1C-OX293-0-70	TMXW_04	506116.6	5043305.7	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	PUB1D-OX293-0-70	TMXW_05	506025.2	5043301.6	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	PUB1E-OX293-0-70	TMXW_06	506035.3	5043283.6	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	PUB1F-OX293-0-70	TMXW_07	505992.2	5043284.9	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	CUB2-OX293-0-70	TMXW_08	506533.24	5043483.2	62.70	38.29	11.67	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	3.40E-01	1.49E+00	3.15E-02	1.38E-01	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	2.57E-03	1.13E-02	
TMXW	CUB3 - OX293B-0-70	TMC3_02	506300.9	5043548.9	62.70	28.00	8.53	1.25	0.38	4,094.17	1.93	3,336.23	55.60	16.95	250.00	394.26	7.20E-02	3.15E-01	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00	0.00E+00
COOLTOW	RAC4-CT114-1	CTC4_01	506401.76	5043561.2	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-2	CTC4_02	506401.71	5043576.1	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-3	CTC4_03	506414.44	5043561.5	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-4	CTC4_04	506414.44	5043576.3	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-5	CTC4_05	506427.26	5043561.4	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-6	CTC4_06	506427.31	5043576.2	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-7	CTC4_07	506440.14	5043561.6	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-8	CTC4_08	506439.99	5043576.2	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-9	CTC4_09	506452.81	5043561.7	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-10	CTC4_10	506452.76	5043576.5	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00	1.42E-02	6.21E-02	4.30E-02	5.07E-02	1.53E-04	2.24E-04	0.00E+00	0.00E+00	
COOLTOW	RAC4-CT114-11	CTC4_11	506465.78	5043561.8	62.70	51.00	15.54	28.00	8.53	588,154.79	277.58	955.18	15.92	4.85	68.00	293.15	0.00E+00	0.00E+00	0.00E+00	0.00E+00									

Intel Corporation - Stack Information

Table with columns: Equipment Type, Equipment ID, Stack ID, UTM Easting, UTM Northing, Elevation (m), Stack Height (ft, m), Stack Diameter (ft, m), Adjusted Stack Flow Rate (ft³/min, m³/s), Stack Velocity (ft/min, m/s), Stack Temperature (°F, K), and pollutant concentrations (NOx, CO, PM, PM10, PM2.5, SO2) in lb/hr and tpy.



Equipment Type	Building	Equipment ID	Stack ID	Stack Height			Stack Diameter (m)	Stack Velocity (m/s)	Stack Temperature (K)	NOx		CO		PM10		PM25		SO2		
				UTM Easting	UTM Northing	Elevation (m)				(m)	Hourly Emissions (g/s)	Annual Emissions (g/s)	Hourly Emissions (g/s)	Hourly 8-HR Emissions (g/s)	Hourly Emissions (g/s)	Annual Emissions (g/s)	Hourly Emissions (g/s)	Annual Emissions (g/s)	Hourly Emissions (g/s)	Annual Emissions (g/s)
Boiler	CUB1	F20-BLR115-1-200	BOC1_01	506743.17	5043806.7	62.70	30.18	0.81	5.70	372.04	4.28824E-02	1.28647E-02	1.45066E-01	1.45066E-01	2.02341E-03	6.07024E-04	1.67321E-03	5.01962E-04	1.01171E-02	3.03512E-03
Boiler	CUB1	F20-BLR115-2-200	BOC1_02	506745.67	5043806.7	62.70	30.18	0.81	5.70	372.04	4.28824E-02	1.28647E-02	1.45066E-01	1.45066E-01	2.02341E-03	6.07024E-04	1.67321E-03	5.01962E-04	1.01171E-02	3.03512E-03
Boiler	CUB1	F20-BLR115-3-200	BOC1_03	506748.17	5043806.7	62.70	30.18	0.81	5.70	372.04	4.28824E-02	1.28647E-02	1.45066E-01	1.45066E-01	2.02341E-03	6.07024E-04	1.67321E-03	5.01962E-04	1.01171E-02	3.03512E-03
Boiler	CUB1	F20-BLR115-4-200	BOC1_04	506750.67	5043806.7	62.70	30.18	0.61	10.09	372.04	4.16776E-02	1.25033E-02	1.40990E-01	1.40990E-01	1.96656E-03	5.89969E-04	1.62620E-03	4.87859E-04	9.44034E-03	2.94985E-03
Boiler	CUB1	F20-BLR115-5-200	BOC1_05	506753.17	5043806.7	62.70	30.18	0.61	10.09	449.82	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	RA1	RA1-MECH-B01	BOR1_01	506843.5	5043630.5	62.70	28.96	0.20	3.26	372.04	8.89412E-03	2.66824E-03	7.47106E-03	7.47106E-03	4.62494E-05	1.38748E-05	3.82447E-05	1.14734E-05	2.31247E-04	6.93741E-05
Boiler	RA1	RA1-MECH-B02	BOR1_02	506804.48	5043762.9	62.70	28.96	0.15	5.79	372.04	1.23529E-02	3.70588E-03	1.03765E-02	1.03765E-02	6.42353E-05	1.92706E-05	5.31176E-05	1.59353E-05	3.21176E-04	9.63529E-05
Boiler	CUB2	CUB2-BLR115-1-210	BOC2_01	506579.98	5043557.1	62.70	13.72	0.81	2.33	372.04	4.37155E-02	1.31146E-02	1.47884E-01	1.47884E-01	2.06272E-03	6.18817E-04	1.70571E-03	5.11714E-04	1.03136E-02	3.09409E-03
Boiler	CUB2	CUB2-BLR115-2-210	BOC2_02	506579.22	5043582.7	62.70	13.72	0.81	2.33	372.04	4.37155E-02	1.31146E-02	1.47884E-01	1.47884E-01	2.06272E-03	6.18817E-04	1.70571E-03	5.11714E-04	1.03136E-02	3.09409E-03
Boiler	CUB2	CUB2-BLR115-3-210	BOC2_03	506574.1	5043556.8	62.70	13.72	0.81	2.33	372.04	4.37155E-02	1.31146E-02	1.47884E-01	1.47884E-01	2.06272E-03	6.18817E-04	1.70571E-03	5.11714E-04	1.03136E-02	3.09409E-03
Boiler	CUB2	CUB2-BLR115-4-210	BOC2_04	506575	5043575.9	62.70	13.72	0.81	2.33	372.04	4.44595E-02	1.33378E-02	1.50401E-01	1.50401E-01	2.09783E-03	6.29349E-04	1.73474E-03	5.20423E-04	1.04891E-02	3.14674E-03
Boiler	CUB2	CUB2-BLR115-5-210	BOC2_05	506536.08	5043603.2	62.70	13.72	0.61	10.09	372.04	4.00126E-02	1.20038E-02	1.35358E-01	1.35358E-01	1.88800E-03	5.66401E-04	1.56123E-03	4.68370E-04	9.44002E-03	2.83201E-03
Boiler	CUB2	CUB2-BLR115-6-210	BOC2_06	506556.51	5043600.4	62.70	13.72	0.61	10.09	372.04	4.16816E-02	1.25045E-02	1.41004E-01	1.41004E-01	1.96676E-03	5.90027E-04	1.62636E-03	4.87907E-04	9.83378E-03	2.95013E-03
Boiler	RA4	RA4-BLR152-2-30	BOR4_01	506497.72	5043102.2	62.70	36.90	0.20	3.94	449.82	2.46935E-02	7.40806E-03	2.07426E-02	2.07426E-02	1.28406E-04	3.18547E-05	1.06182E-04	3.18547E-05	6.42032E-04	1.92610E-04
Boiler	RA4	RA4-BLR152-1-30	BOR4_02	506500.12	5043103	62.70	36.90	0.20	3.94	449.82	2.46935E-02	7.40806E-03	2.07426E-02	2.07426E-02	1.28406E-04	3.18547E-05	1.06182E-04	3.18547E-05	6.42032E-04	1.92610E-04
Boiler	RA4	RA4-BLR117-2-30	BOR4_03	506524.09	5043114.7	62.70	40.23	0.30	11.46	449.82	2.46935E-02	7.40806E-03	2.07426E-02	2.07426E-02	1.28406E-04	3.18547E-05	1.06182E-04	3.18547E-05	6.42032E-04	1.92610E-04
Boiler	RA4	RA4-BLR117-1-30	BOR4_04	506526.12	5043116.1	62.70	40.23	0.30	11.46	449.82	2.46935E-02	7.40806E-03	2.07426E-02	2.07426E-02	1.28406E-04	3.18547E-05	1.06182E-04	3.18547E-05	6.42032E-04	1.92610E-04
Boiler	RA4	RA4-BLR117-3-30	BOR4_05	506460.1	5043063.7	62.70	40.23	0.61	10.66	449.82	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	RA4	RA4-BLR117-4-30	BOR4_06	506460.94	5043063.7	62.70	40.23	0.61	10.66	449.82	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	CUB3	BLR-115-1-210	BOC3_01	506360.1	5043421.3	62.70	15.54	0.46	2.50	422.04	6.17521E-02	1.85256E-02	3.76020E-02	3.76020E-02	5.24481E-04	1.57344E-04	4.33706E-04	1.30112E-04	2.62241E-03	7.86722E-04
Boiler	CUB3	BLR-115-2-210	BOC3_02	506360.1	5043423.2	62.70	15.54	0.81	3.17	422.04	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	CUB3	BLR-115-3-210	BOC3_03	506360.3	5043432.1	62.70	15.54	0.81	3.17	422.04	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	CUB3	BLR-115-4-210	BOC3_04	506359.8	5043418.4	62.70	15.54	0.81	1.39	422.04	4.44602E-02	1.33380E-02	1.50403E-01	1.50403E-01	2.09786E-03	6.29358E-04	1.73477E-03	5.20431E-04	1.04893E-02	3.14679E-03
Boiler	CUB3	BLR-115-5-210	BOC3_05	506360.1	5043419.9	62.70	15.54	0.61	3.56	422.04	6.48363E-02	1.94509E-02	6.58000E-02	6.58000E-02	9.17794E-04	2.75398E-04	7.58945E-04	2.27683E-04	4.58897E-03	1.37669E-03
Boiler	CUB3	BLR-115-6-210	BOC3_06	506334.9	5043505.4	62.70	15.54	0.61	3.56	422.04	4.00126E-02	1.20038E-02	1.35358E-01	1.35358E-01	1.88800E-03	5.66401E-04	1.56123E-03	4.68370E-04	9.44002E-03	2.83201E-03
Boiler	RP1	RP1-BLR115-1-210	BORP1_01	506762	5043315.3	62.70	12.80	0.51	3.03	418.71	1.89213E-02	5.67640E-03	6.40086E-02	6.40086E-02	2.67848E-04	7.38282E-04	2.21485E-04	4.46024E-03	1.33921E-03	4.00000E-03
Boiler	RP1	RP1-BLR115-2-210	BORP1_02	506762	5043311.1	62.70	12.80	0.51	3.03	418.71	1.66724E-02	5.00172E-03	5.64007E-02	5.64007E-02	7.86690E-04	2.36007E-04	6.50532E-04	1.95160E-04	3.93345E-03	1.18003E-03
Boiler	RP1	RP1-BLR115-3-210	BORP1_03	506762	5043307	62.70	12.80	0.51	3.03	418.71	1.66724E-02	5.00172E-03	5.64007E-02	5.64007E-02	7.86690E-04	2.36007E-04	6.50532E-04	1.95160E-04	3.93345E-03	1.18003E-03
Boiler	RP1	RP1-BLR115-4-210	BORP1_04	506762	5043302.8	62.70	12.80	0.51	1.06	449.82	1.59482E-02	4.78445E-03	5.39507E-02	5.39507E-02	7.52516E-04	6.22275E-04	1.86682E-04	3.76258E-03	1.12877E-03	3.09409E-03
Boiler	CUB4	CUB4-BLR115-1-10	BOC4_01	506418.13	5043522	62.70	26.37	0.51	10.82	449.82	1.94495E-02	5.83486E-03	6.57954E-02	6.57954E-02	9.17730E-04	2.75319E-04	7.58892E-04	2.27668E-04	4.58865E-03	1.37659E-03
Boiler	CUB4	CUB4-BLR115-2-10	BOC4_02	506418.4	5043527.6	62.70	26.37	0.61	13.79	449.82	4.16776E-02	1.25033E-02	1.40990E-01	1.40990E-01	1.96656E-03	5.89969E-04	1.62620E-03	4.87859E-04	9.44034E-03	2.94985E-03
Boiler	CUB4	CUB4-BLR115-3-10	BOC4_03	506429.87	5043517.1	62.70	26.37	0.61	13.79	449.82	4.16776E-02	1.25033E-02	1.40990E-01	1.40990E-01	1.96656E-03	5.89969E-04	1.62620E-03	4.87859E-04	9.44034E-03	2.94985E-03
Boiler	CUB4	CUB4-BLR115-4-10	BOC4_04	506429.87	5043522.4	62.70	26.37	0.61	13.79	449.82	4.16776E-02	1.25033E-02	1.40990E-01	1.40990E-01	1.96656E-03	5.89969E-04	1.62620E-03	4.87859E-04	9.44034E-03	2.94985E-03
Boiler	CUB4	CUB4-BLR115-5-10	BOC4_05	506429.87	5043527.8	62.70	26.37	0.61	13.79	449.82	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	CUB4	CUB4-BLR115-6-10	BOC4_06	506417.92	5043516.1	62.70	26.37	0.61	13.79	449.82	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	CUB4x	CUB4-BLR115-7-10	BOC4_07	506437.44	5043483.6	62.70	26.37	0.61	13.79	449.82	4.00140E-02	1.20042E-02	1.35363E-01	1.35363E-01	1.88807E-03	5.66420E-04	1.56129E-03	4.68386E-04	9.44034E-03	2.83210E-03
Boiler	CUB5	RAC5-BLR115-1	BOC5_01	505876.9	5043551.4	62.70	21.34	0.61	13.79	449.82	4.00099E-02	1.20030E-02	1.35349E-01	1.35349E-01	1.88788E-03	5.66363E-04	1.56113E-03	4.68338E-04	9.43938E-03	2.83181E-03
Boiler	CUB5	RAC5-BLR115-2	BOC5_02	505874.6	5043551.4	62.70	21.34	0.61	13.79	449.82	4.00099E-02	1.20030E-02	1.35349E-01	1.35349E-01	1.88788E-03	5.66363E-04	1.56113E-03	4.68338E-04	9.43938E-03	2.83181E-03
Boiler	CUB5	RAC5-BLR115-3	BOC5_03	505872.1	5043551.4	62.70	21.34	0.61	13.79	449.82	4.00099E-02	1.20030E-02	1.35349E-01	1.35349E-01	1.88788E-03	5.66363E-04	1.56113E-03	4.68338E-04	9.43938E-03	2.83181E-03
Boiler	CUB5	RAC5-BLR115-4	BOC5_04	505869.5	5043551.4	62.70	21.34	0.61	13.79	449.82	4.00099E-02	1.20030E-02	1.35349E-01	1.35349E-01	1.88788E-03	5.66363E-04	1.56113E-03	4.68338E-04	9.43938E-03	2.83181E-03
Boiler	RA2	RA2-BLR115-1-300	BOR2_01	506833.31	5043555.2	62.70	28.96	0.36	1.03	359.82	5.71765E-03	1.93421E-03	1.93421E-02	1.93421E-02	2.69788E-04	8.09365E-05	2.23094E-04	6.69282E-05	1.34894E-03	4.04682E-04
Boiler	RA2	RA2-BLR115-2-300	BOR2_02	506833.31	5043555.3	62.70	28.96	0.36	1.03	359.82	5.71765E-03	1.93421E-03	1.93421E-02	1.93421E-02	2.69788E-04	8.09365E-05	2.23094E-04	6.69282E-05	1.34894E-03	4.04682E-04
Boiler	RS4	RS4-BLR115-1	BORS4_01	505917.6	5043854.6	62.70	16.46	0.30	11.46	449.82	9.07563E-03	2.72269E-03	9.21053E-03	9.21053E-03	1.28471E-					



HEATER	RA3	RA3 Combined Modeling Stack	HER3_M	506679.8	5043176.5	62.70	24.99	0.15	5.00	422.04	1.96659E-01	9.83294E-02	1.65193E-01	1.65193E-01	4.91647E-03	2.45824E-03	4.91647E-03	2.45824E-03	5.11313E-03	2.55656E-03
HEATER	RS4	RS4 Combined Modeling Stack	HERS4_M	505951	5043852.3	62.70	18.29	0.15	5.00	422.04	5.07706E-02	2.53853E-02	4.26473E-02	4.26473E-02	1.26926E-03	6.34632E-04	1.26926E-03	6.34632E-04	1.32004E-03	6.60018E-04
HEATER	RS5	RS5 Combined Modeling Stack	HERS5_M	505915.2	5043725.7	62.70	18.29	0.15	5.00	422.04	9.13994E-02	4.56997E-02	7.67755E-02	7.67755E-02	2.28499E-03	2.28499E-03	2.28499E-03	2.28499E-03	1.14249E-03	1.18819E-03
HEATER	RS6	RS6 Combined Modeling Stack	HERS6_M	505939.9	5043588.1	62.70	18.29	0.15	5.00	422.04	3.89118E-02	1.94559E-02	3.26859E-02	3.26859E-02	9.72794E-04	4.86397E-04	9.72794E-04	4.86397E-04	1.01171E-03	5.05853E-04
HEATER	LT4	Lunch Tent Combined Modeling Stack	HELT4_M	506443.2	5043804.3	62.70	12.50	0.15	5.00	422.04	3.53912E-02	1.76956E-02	2.97286E-02	2.97286E-02	8.84779E-04	4.42390E-04	8.84779E-04	4.42390E-04	9.20171E-04	4.60085E-04
HEATER	Aloha	Aloha Combined Modeling Stack	HEAL_M	509091.1	5037889	69.40	14.02	0.15	5.00	422.04	3.63300E-02	1.81650E-02	3.05172E-02	3.05172E-02	9.08250E-04	4.54125E-04	9.08250E-04	4.54125E-04	9.44580E-04	4.72290E-04
HEATER	RS2	RS2 Combined Modeling Stack	HERS2_M	506491.4	5043738.9	62.70	13.11	0.15	5.00	422.04	3.95294E-02	1.97647E-02	3.32047E-02	3.32047E-02	9.88235E-04	4.94118E-04	9.88235E-04	4.94118E-04	1.02776E-03	5.13882E-04
HEATER	RA1	RA1 Combined Modeling Stack	HERA1_M	506835.9	5043715.5	62.70	16.46	0.15	5.00	422.04	1.85294E-03	9.26471E-04	1.55647E-03	1.55647E-03	4.63235E-05	2.31618E-05	4.63235E-05	2.31618E-05	4.81765E-05	2.40882E-05
HEATER	CUB4	CUB 4 Heater	HEC4_M	506404.21	5043465.8	62.70	24.08	0.15	5.00	422.04	3.70588E-03	1.85294E-03	3.11294E-03	3.11294E-03	9.26471E-05	4.63235E-05	9.26471E-05	4.63235E-05	9.63529E-05	4.81765E-05
HEATER	PUB1	PUB1 Heater	HEPB1_M	506212.9	5043427.9	62.70	31.70	0.15	5.00	422.04	1.85294E-02	9.26471E-03	1.55647E-02	1.55647E-02	4.63235E-04	2.31618E-04	4.63235E-04	2.31618E-04	4.81765E-04	2.40882E-04
HEATER	CUB5	CUB 5 Heater	HEC5_M	505862	5043464.8	62.70	22.40	0.15	5.00	422.04	1.85294E-02	9.26471E-03	1.55647E-02	1.55647E-02	4.63235E-04	2.31618E-04	4.63235E-04	2.31618E-04	4.81765E-04	2.40882E-04
TMXW	CUB3	CUB3 - OX293-0-70	TMXW_01	506292.12	5043551.6	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	PUB1	PUB1A-OX293-0-70	TMXW_02	506166.44	5043393	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	PUB1	PUB1B-OX293-0-70	TMXW_03	506100.6	5043326.9	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	PUB1	PUB1C-OX293-0-70	TMXW_04	506116.6	5043305.7	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	PUB1	PUB1D-OX293-0-70	TMXW_05	506025.2	5043301.6	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	PUB1	PUB1E-OX293-0-70	TMXW_06	506035.3	5043283.6	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	PUB1	PUB1F-OX293-0-70	TMXW_07	505992.2	5043284.9	62.70	8.53	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	CUB2	CUB2-OX293-0-70	TMXW_08	506533.24	5043483.2	62.70	11.67	0.38	16.95	394.26	4.28400E-02	4.28400E-02	3.96900E-03	3.96900E-03	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04	3.24265E-04
TMXW	CUB3	CUB3 - OX293B-0-70	TMC3_02	506300.9	5043548.9	62.70	8.53	0.38	16.95	394.26	9.07200E-03	9.07200E-03	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-1	CTC4_01	506401.76	5043561.2	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-2	CTC4_02	506401.71	5043576.1	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-3	CTC4_03	506414.44	5043561.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-4	CTC4_04	506414.44	5043576.3	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-5	CTC4_05	506427.26	5043561.4	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-6	CTC4_06	506427.31	5043576.2	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-7	CTC4_07	506440.14	5043561.6	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-8	CTC4_08	506439.99	5043576.2	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-9	CTC4_09	506452.81	5043561.7	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-10	CTC4_10	506452.76	5043576.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-11	CTC4_11	506465.78	5043561.8	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-12	CTC4_12	506465.78	5043576.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-13	CTC4_13	506396.77	5043625.1	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-14	CTC4_14	506396.92	5043610.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-15	CTC4_15	506409.43	5043625.2	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4	RAC4-CT114-16	CTC4_16	506409.78	5043610.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4X	RAC4-CT114-17	CTC4_17	506422.09	5043625.2	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4X	RAC4-CT114-18	CTC4_18	506422.44	5043610.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4X	RAC4-CT114-19	CTC4_19	506434.65	5043625.2	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB4X	RAC4-CT114-20	CTC4_20	506435	5043610.5	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB5	RAC5-CT115-1	CTC5_01	505911.75	5043470.7	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB5	RAC5-CT115-2	CTC5_02	505911.42	5043486	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB5	RAC5-CT115-3	CTC5_03	505924.57	5043470.7	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.43262E-06	0.00000E+00	0.00000E+00
COOLTOW	CUB5	RAC5-CT115-4	CTC5_04	505924.24	5043486	62.70	15.54	8.53	4.85	293.15	0.00000E+00	0.00000E+00	0.00000E+00	0.00000E+00	5.41311E-03	1.45806E-03	1.92516E-05	6.4326		



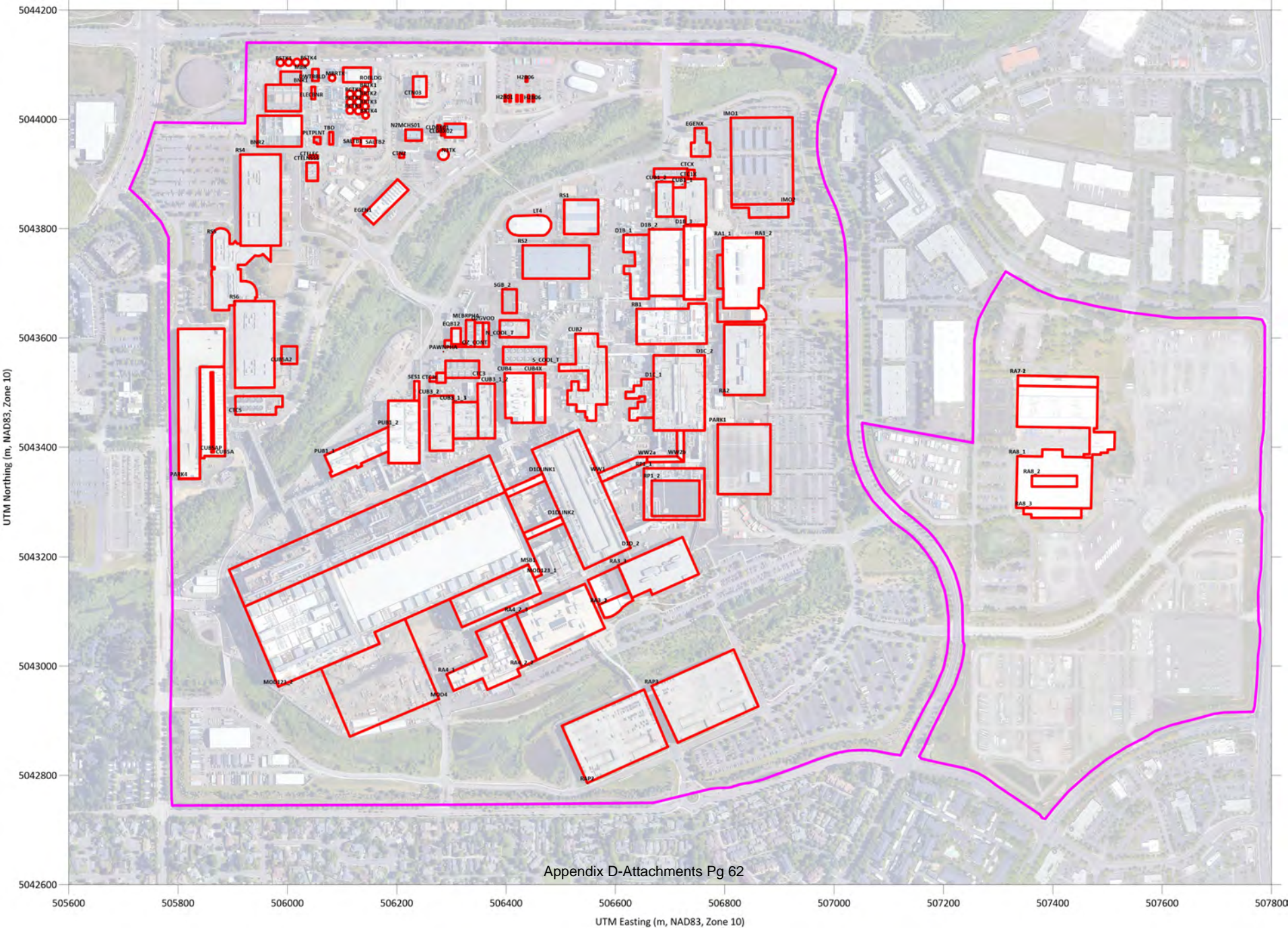


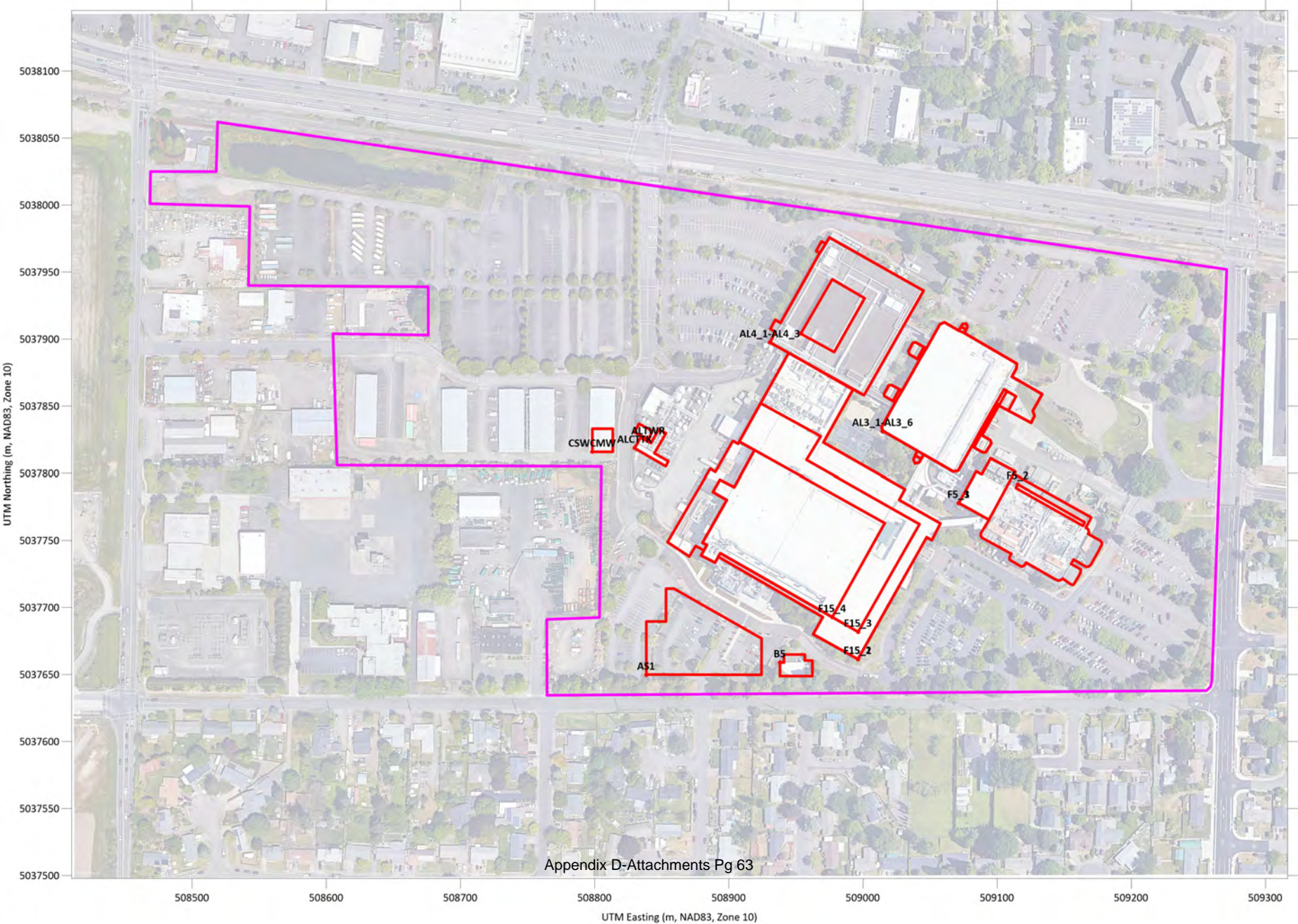
EGEN	D1X EGEN1	D1X-GEN-4B	EGE1_11	506188.4	5043858.8	62.70	15.54	0.51	18.19	715.93	6.02317E+00	4.12546E-02	7.06234E-01	8.82793E-01	8.07125E-02	5.52826E-04	8.07125E-02	5.52826E-04	5.55336E-03	3.80367E-05
EGEN	D1X EGEN1	D1X-GEN-5C	EGE1_12	506194.66	5043862	62.70	15.54	0.61	36.84	715.93	6.02317E+00	4.12546E-02	1.41247E-01	1.76559E-01	1.21069E-02	8.29238E-05	1.21069E-02	8.29238E-05	5.55336E-03	3.80367E-05
EGEN	D1X EGEN1	D1X-GEN-4C	EGE1_13	506192.64	5043863.1	62.70	15.54	0.51	18.19	715.93	6.02317E+00	4.12546E-02	7.06234E-01	8.82793E-01	8.07125E-02	5.52826E-04	8.07125E-02	5.52826E-04	5.55336E-03	3.80367E-05
EGEN	D1X EGEN1	D1X-GEN-5A	EGE1_14	506199.06	5043866.4	62.70	15.54	0.61	36.84	715.93	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.27224E-02	8.71400E-05	1.27224E-02	8.71400E-05	6.52123E-03	4.46659E-05
EGEN	D1X EGEN1	D1X-GEN-5B	EGE1_15	506197.76	5043867.4	62.70	15.54	0.61	36.84	715.93	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	D1X EGEN1	D1X-GEN-6A	EGE1_16	506202.67	5043870.6	62.70	15.54	0.61	36.84	715.93	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	D1X EGEN1	D1X-GEN-6B	EGE1_17	506201.1	5043871.7	62.70	15.54	0.61	36.84	715.93	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	D1X EGEN1	D1X-GEN-6C	EGE1_18	506208.48	5043875.8	62.70	15.54	0.61	36.84	715.93	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	D1X EGEN1	D1X-GEN-7A	EGE1_19	506206.28	5043877.6	62.70	15.54	0.51	18.19	715.93	6.02317E+00	4.12546E-02	1.41247E-01	1.76559E-01	1.21069E-02	8.29238E-05	1.21069E-02	8.29238E-05	5.55336E-03	3.80367E-05
EGEN	D1X EGEN1	D1X-GEN-7B	EGE1_20	506210.87	5043879	62.70	15.54	0.51	18.19	715.93	6.02317E+00	4.12546E-02	1.41247E-01	1.76559E-01	1.21069E-02	8.29238E-05	1.21069E-02	8.29238E-05	5.55336E-03	3.80367E-05
EGEN	D1X EGEN1	D1X-GEN-7C	EGE1_21	506208.89	5043880.9	62.70	15.54	0.51	18.19	715.93	6.02317E+00	4.12546E-02	1.41247E-01	1.76559E-01	1.21069E-02	8.29238E-05	1.21069E-02	8.29238E-05	5.55336E-03	3.80367E-05
EGEN	CUB5	D1X2-GEN-1A	EGC5_01	505880.6	5043410.9	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-1B	EGC5_02	505880.6	5043416.1	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-1C	EGC5_03	505880.6	5043424.3	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-2A	EGC5_04	505880.6	5043432.3	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-2B	EGC5_05	505880.6	5043445.1	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-2C	EGC5_06	505880.6	5043451.2	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-3A	EGC5_07	505880.6	5043456.9	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-3B	EGC5_08	505880.6	5043479.5	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-3C	EGC5_09	505880.6	5043485.6	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-4A	EGC5_10	505880.6	5043491.7	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-4B	EGC5_11	505880.6	5043497.8	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-4C	EGC5_12	505880.6	5043515.2	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-5A	EGC5_13	505880.6	5043521.3	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-5B	EGC5_14	505880.6	5043527.4	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-5C	EGC5_15	505880.6	5043532.8	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-6A	EGC5_16	505880.6	5043527.4	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-6B	EGC5_17	505880.6	5043521.3	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-6C	EGC5_18	505880.6	5043515.2	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-7A	EGC5_19	505880.6	5043497.8	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-7B	EGC5_20	505880.6	5043491.7	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	CUB5	D1X2-GEN-7C	EGC5_21	505880.6	5043485.6	62.70	25.92	0.51	53.04	716.48	8.56171E+00	5.86419E-02	1.11735E-01	1.39669E-01	1.11585E-02	7.64283E-05	1.11585E-02	7.64283E-05	7.68786E-03	5.26566E-05
EGEN	D1B	F20-EPS-1	EGDB_01	506725.14	5043877.9	62.70	10.67	0.25	38.60	953.71	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	D1B	F20-EPS-2	EGDB_02	506725.14	5043875.1	62.70	10.67	0.25	38.60	953.71	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	D1B	F20-CPS-1	EGDB_03	506719.91	5043809.6	62.70	13.72	0.25	38.60	953.71	6.08126E+00	4.16525E-02	1.39362E+00	1.74203E+00	6.36331E-02	4.35843E-04	6.36331E-02	4.35843E-04	3.07484E-03	2.10605E-05
EGEN	F15	F15-EG01	EGF15_01	508927.12	5037851.6	69.40	19.66	0.30	23.47	779.82	3.29566E+00	2.25730E-02	1.39432E+00	1.74290E+00	6.36331E-02	4.35843E-04	6.36331E-02	4.35843E-04	3.07637E-03	2.10710E-05
EGEN	F15	F15-EG02	EGF15_02	508928.16	5037851.1	69.40	19.66	0.30	30.09	768.15	3.29566E+00	2.25730E-02	1.39432E+00	1.74290E+00	6.36331E-02	4.35843E-04	6.36331E-02	4.35843E-04	3.07637E-03	2.10710E-05
EGEN	F15	F15-EG03	EGF15_03	508929.2	5037850.5	69.40	19.66	0.30	30.09	768.15	3.29566E+00	2.25730E-02	1.39432E+00	1.74290E+00	6.36331E-02	4.35843E-04	6.36331E-02	4.35843E-04	3.07637E-03	2.10710E-05
EGEN	F5	F15.5-EG01	EGF5_01	509104.57	5037792.7	69.40	20.42	0.30	30.09	768.15	6.92244E+00	4.74140E-02	1.74132E+00	2.17665E+00	7.30800E-02	5.00548E-04	7.30800E-02	5.00548E-04	3.29196E-03	2.25477E-05
EGEN	F5	F15.5-EG02	EGF5_02	509109.61	5037797.5	69.40	20.42	0.30	30.09	768.15	6.92244E+00	4.74140E-02	1.74132E+00	2.17665E+00	7.30800E-02	5.00548E-04	7.30800E-02	5.00548E-04	3.29196E-03	2.25477E-05
EGEN	N2 Plant	N2-GEN-1A	EGN2_01	506274.7	5043906.6	62.70	6.10	0.36	36.83	829.82	9.88533E-01	6.77077E-03	8.36451E-02	1.04556E-01	5.95350E-03	4.07774E-05	5.95350E-03	4.07774E-05	9.22758E-04	6.32026E-06
EGEN	IWW	H2-GEN-1	EGH2_01	506437.39	5044073.8	62.70	7.93	0.22	27.43	770.15	3.64593E-01	2.49721E-03	8.63510E-02	1.07939E-02	3.16620E-03	2.16863E-05	3.16620E-03	2.16863E-05	7.07932E-04	4.84885E-06
EGEN	IWW	IWW-GEN-2	EGIW_01	506152.98	5044046.4	62.70	6.70	0.22	91.83	720.26	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	IWW PS	IWW-GEN-1	EGIW_02	506161.38	5044046.5	62.70	5.91	0.22	91.83	720.26	6.14881E+00	4.21151E-02	4.73897E-02	5.92371E-02	1.90837E-03	1.30710E-05	1.90837E-03	1.30710E-05	6.52123E-03	4.46659E-05
EGEN	RS7	IWW-PS-																		

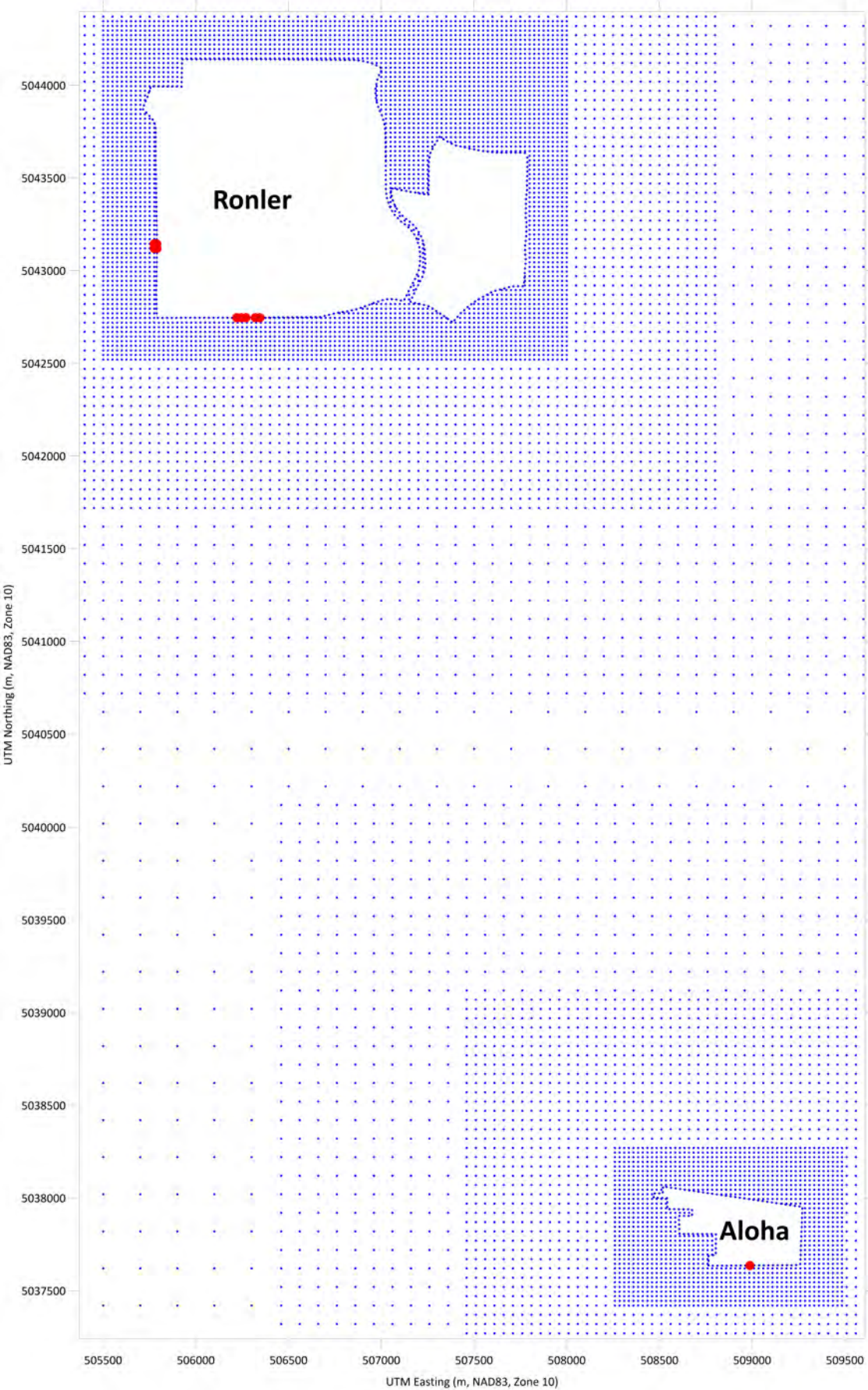
# Attachment C

## Modeling Support Data





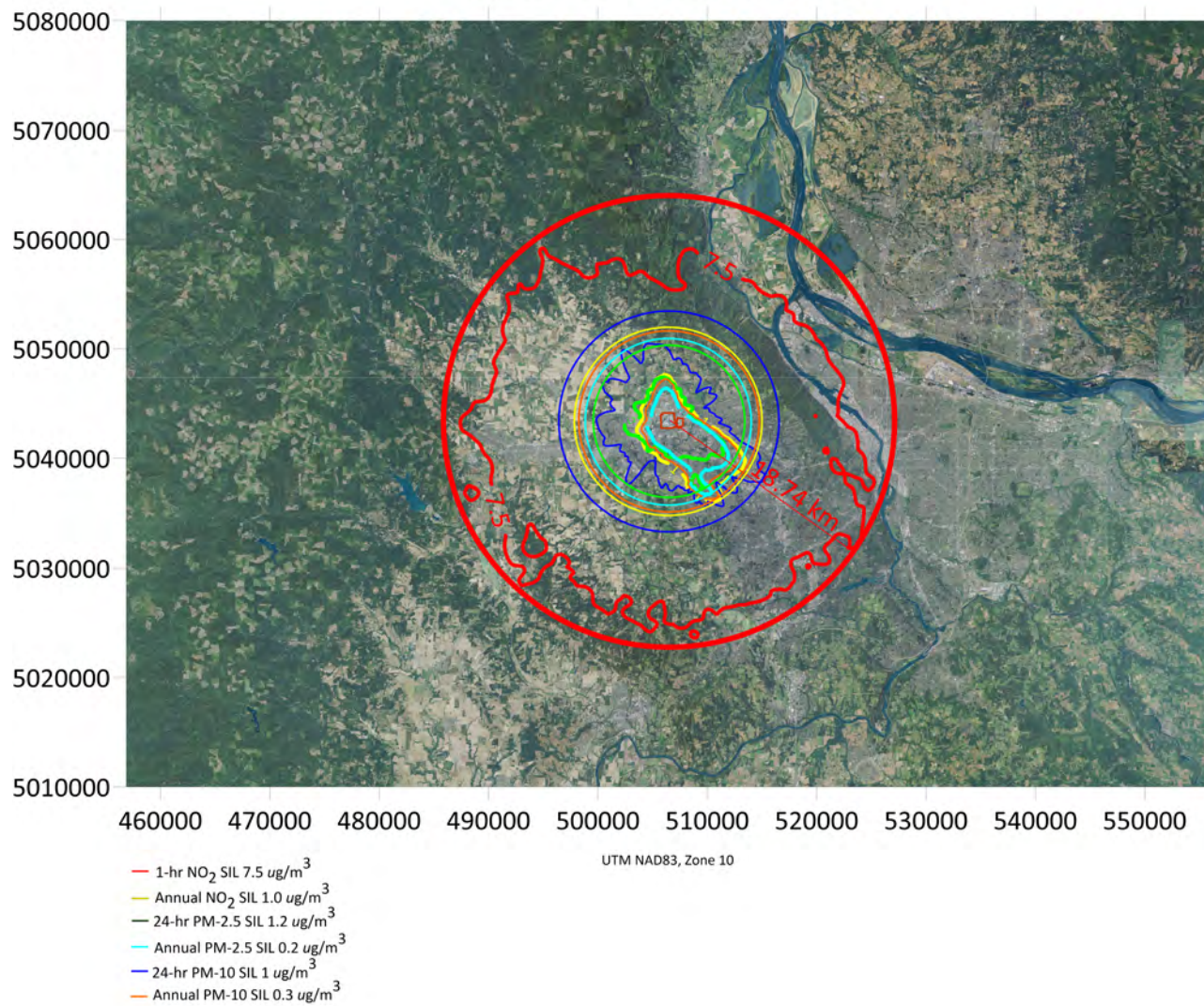




**Combined SIA**

Pollutant	Class I SIL				Significant (Y/N)	Pollutant	Class II SIL				Max Distance (m)	Number of Receptors within SIL Radius	Receptors Falling Within SIL Radius File Name	Number of Receptors Exceeding SIL	Receptors Exceeding SIL File Name
	Averaging Period	Class I SIL (ug/m3)	Modeled	Significant (Y/N)			Averaging Period	Class II SIL (ug/m3)	Modeled	Significant (Y/N)					
CO	1-HR	-	-	-	CO	1-HR	2000	708.8	N	-	-	-	-	-	-
CO	8-HR	-	-	-	CO	8-HR	500	199.6	N	-	-	-	-	-	-
SO2	1-HR	-	-	-	SO2	1-HR	7.8	46.1	Y	-	-	-	-	-	-
SO2	24-HR	0.2	0.0164	N	SO2	24-HR	5	20.1	Y	-	-	-	-	-	-
SO2	Annual	0.1	0.0016	N	SO2	Annual	1	3.8	Y	-	-	-	-	-	-
PM10	24-HR	0.3	0.0619	N	PM10	24-HR	1	9.3	Y	10224.2	19936	Intel-Hillsboro-24HR-PM10-Radius.ROU	16594	Intel-Hillsboro-24HR-PM10-Exceed.ROU	
PM10	Annual	0.2	0.0062	N	PM10	Annual	0.2	2.1	Y	8233.0	18644	Intel-Hillsboro-ANNUAL-PM10-Radius.ROU	12690	Intel-Hillsboro-ANNUAL-PM10-Exceed.ROU	
PM25	24-HR	0.27	0.0374	N	PM25	24-HR	1.2	7.4	Y	6941.5	19874	Intel-Hillsboro-24HR-PM25-Radius.ROU	10475	Intel-Hillsboro-24HR-PM25-Exceed.ROU	
PM25	Annual	0.05	0.0049	N	PM25	Annual	0.3	1.7	Y	6952.0	16892	Intel-Hillsboro-ANNUAL-PM25-Radius.ROU	6451	Intel-Hillsboro-ANNUAL-PM25-Exceed.ROU	
NO2	1-HR	-	-	-	NO2	1-HR	7.5	128.2	Y	18709.2	21662	INTEL-1STSIL-1HR-NO2-Radius.ROU	21599	INTEL-1STSIL-1HR-NO2-Exceed.ROU	
NO2	Annual	0.1	0.0376	N	NO2	Annual	1	13.3	Y	8531.5	18899	Intel-Hillsboro-ANNUAL-NO2-Radius.ROU	13709	Intel-Hillsboro-ANNUAL-NO2-Exceed.ROU	

### Criteria Pollutant Isoleth and Significant Impact Areas



**MERP Qlik Data**

State	County	Metric	Precursor	Emissions	Stack	MERP	MaxConc
Oregon	Morrow	8-hr Ozone	NOx	500	10	258	1.939568996
Oregon	Morrow	8-hr Ozone	VOC	500	10	1087	0.460180402
Oregon	Morrow	Annual PM2.5	NOx	500	10	7942	0.012590836
Oregon	Morrow	Annual PM2.5	SO2	500	10	11877	0.008419393
Oregon	Morrow	Daily PM2.5	NOx	500	10	3003	0.199790135
Oregon	Morrow	Daily PM2.5	SO2	500	10	2314	0.259274006



**MERP Qlik Distance Corrected Data**

State	County	Distance	Metric	Precursor	Emissions	Stack	Concentration
Oregon	Morrow	10	Daily PM2.5	NOx	500	10	0.19979
Oregon	Morrow	10	Daily PM2.5	SO2	500	10	0.259274
Oregon	Morrow	20	Daily PM2.5	NOx	500	10	0.169711
Oregon	Morrow	20	Daily PM2.5	SO2	500	10	0.258138
Oregon	Morrow	40	Daily PM2.5	NOx	500	10	0.143349
Oregon	Morrow	40	Daily PM2.5	SO2	500	10	0.183953
Oregon	Morrow	60	Daily PM2.5	NOx	500	10	0.132754
Oregon	Morrow	60	Daily PM2.5	SO2	500	10	0.186308
Oregon	Morrow	80	Daily PM2.5	NOx	500	10	0.096651
Oregon	Morrow	80	Daily PM2.5	SO2	500	10	0.16239
Oregon	Morrow	100	Daily PM2.5	NOx	500	10	0.078512
Oregon	Morrow	100	Daily PM2.5	SO2	500	10	0.128952
Oregon	Morrow	120	Daily PM2.5	NOx	500	10	0.05442
Oregon	Morrow	120	Daily PM2.5	SO2	500	10	0.094666
Oregon	Morrow	140	Daily PM2.5	NOx	500	10	0.04506
Oregon	Morrow	140	Daily PM2.5	SO2	500	10	0.082554
Oregon	Morrow	160	Daily PM2.5	NOx	500	10	0.03768
Oregon	Morrow	160	Daily PM2.5	SO2	500	10	0.06921
Oregon	Morrow	180	Daily PM2.5	NOx	500	10	0.030171
Oregon	Morrow	180	Daily PM2.5	SO2	500	10	0.054444
Oregon	Morrow	200	Daily PM2.5	NOx	500	10	0.025453
Oregon	Morrow	200	Daily PM2.5	SO2	500	10	0.04928
Oregon	Morrow	220	Daily PM2.5	NOx	500	10	0.026368
Oregon	Morrow	220	Daily PM2.5	SO2	500	10	0.049355
Oregon	Morrow	240	Daily PM2.5	NOx	500	10	0.022697
Oregon	Morrow	240	Daily PM2.5	SO2	500	10	0.049382
Oregon	Morrow	260	Daily PM2.5	NOx	500	10	0.01716
Oregon	Morrow	260	Daily PM2.5	SO2	500	10	0.046912
Oregon	Morrow	280	Daily PM2.5	NOx	500	10	0.013974
Oregon	Morrow	280	Daily PM2.5	SO2	500	10	0.042476
Oregon	Morrow	300	Daily PM2.5	NOx	500	10	0.013349
Oregon	Morrow	300	Daily PM2.5	SO2	500	10	0.039629
Oregon	Morrow	10	Annual PM	NOx	500	10	0.010718
Oregon	Morrow	10	Annual PM	SO2	500	10	0.005588
Oregon	Morrow	20	Annual PM	NOx	500	10	0.012591
Oregon	Morrow	20	Annual PM	SO2	500	10	0.008419
Oregon	Morrow	40	Annual PM	NOx	500	10	0.007258
Oregon	Morrow	40	Annual PM	SO2	500	10	0.004916
Oregon	Morrow	60	Annual PM	NOx	500	10	0.00529
Oregon	Morrow	60	Annual PM	SO2	500	10	0.00371
Oregon	Morrow	80	Annual PM	NOx	500	10	0.004619
Oregon	Morrow	80	Annual PM	SO2	500	10	0.003168
Oregon	Morrow	100	Annual PM	NOx	500	10	0.003881
Oregon	Morrow	100	Annual PM	SO2	500	10	0.00288
Oregon	Morrow	120	Annual PM	NOx	500	10	0.003419

Oregon	Morrow	120 Annual PM SO2	500	10	0.002564
Oregon	Morrow	140 Annual PM NOx	500	10	0.002956
Oregon	Morrow	140 Annual PM SO2	500	10	0.0024
Oregon	Morrow	160 Annual PM NOx	500	10	0.002599
Oregon	Morrow	160 Annual PM SO2	500	10	0.002372
Oregon	Morrow	180 Annual PM NOx	500	10	0.002163
Oregon	Morrow	180 Annual PM SO2	500	10	0.002181
Oregon	Morrow	200 Annual PM NOx	500	10	0.001741
Oregon	Morrow	200 Annual PM SO2	500	10	0.002163
Oregon	Morrow	220 Annual PM NOx	500	10	0.001652
Oregon	Morrow	220 Annual PM SO2	500	10	0.002284
Oregon	Morrow	240 Annual PM NOx	500	10	0.001515
Oregon	Morrow	240 Annual PM SO2	500	10	0.002291
Oregon	Morrow	260 Annual PM NOx	500	10	0.001374
Oregon	Morrow	260 Annual PM SO2	500	10	0.002255
Oregon	Morrow	280 Annual PM NOx	500	10	0.001086
Oregon	Morrow	280 Annual PM SO2	500	10	0.002123
Oregon	Morrow	300 Annual PM NOx	500	10	0.000935
Oregon	Morrow	300 Annual PM SO2	500	10	0.001945



REGION	FIPS	COUNTY	COUNTY NAME	SourceNo	SourceName	Address	City	Zip Code	Latitude	Longitude	UTM (m)	UTM (m)	Distance(S)	CORSEPOL	CO Comb J	NORFPEL1	NORC	Comb P	OMSEPL	PM10 CO	PM25PEL	PM25 CO	SO2PEL1	SO2 CO	VOCPEL1	CO RD	CO RA	NOR	NOR Ratio	PM10 RD	PM10 RA	PM25 RD	PM25 RA	SO2 RD	SO2 RA	CO S1	Nr S1	PM10 S1	PM25 S1	SO2 S1	Permit/Title	Operational	Source#	EIP/ProjectID	
NWR	41067	34	WASHINGTON	341228	Irwin Semiconductor In-process	3118 NE BROADWOOD PKWY	HILLSBORO	97124	45.9485	-122.2811	505416	504865	1.00	99	899	39	289	14	114	9	109	39	39	22.475	4.66102	57.8	1.72E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	2008	9					
NWR	41067	34	WASHINGTON	341227	CK Infrastructure, Inc.	18405 N BROADWOOD PKWY	HILLSBORO	97124-6303	45.5477	-122.2931	505464	5044054	1.00	99	899	39	289	14	114	9	109	39	39	22.475	4.66102	57.8	1.72E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	2008	9					
NWR	41067	34	WASHINGTON	341017	Dyne's USA Corp.	4750 NE DAWSON CREEK DR	HILLSBORO	97124	45.5467	-122.933	505254	5043887	1.16	99	899	39	289	14	114	9	109	39	39	22.475	5.17E+02	57.8	2.01E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	1883	9					
NWR	41067	34	WASHINGTON	341241	Fossil Fuel Colorado Corp	5725 NE Huffman Street	Hillsboro	97124	45.5577	-122.823	506051	5044832	1.38	99	899	39	289	14	114	9	109	39	39	22.475	6.15E+02	57.8	2.96E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	6286	9					
NWR	41067	34	WASHINGTON	341083	STACIK Infrastructure, Inc.	8135 NE Broadwood Pkwy	Hillsboro	97124	45.5509	-122.821	507845	5043656	1.45	99	899	39	289	14	114	9	109	39	39	22.475	6.47E+02	57.8	2.51E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	5818	9					
NWR	41067	34	WASHINGTON	341290	Tobiko Ohta Kogyo America, Inc.	4600 NW Evergreen Pkwy	HILLSBORO	97124	45.5510	-122.924	505700	5044884	1.50	99	899	39	289	14	114	9	109	39	39	22.475	6.78E+02	57.8	2.95E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	2087	9					
NWR	41067	34	WASHINGTON	341224	CTS Investment Properties III	4951 E Huffman St	Hillsboro	97124	45.5571	-122.827	506061	5044843	1.52	99	899	39	289	14	114	9	109	39	39	22.475	6.98E+02	57.8	3.13E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	5085	9					
NWR	41067	34	WASHINGTON	341005	Opovo LLC, Inc.	2300 NE BROADWOOD PKWY	HILLSBORO	97124	45.5411	-122.937	504387	5043087	1.57	99	899	39	289	14	114	9	109	39	39	22.475	6.98E+02	57.8	2.71E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	1867	9					
NWR	41067	34	WASHINGTON	341021	Genentech, Inc.	4620 N Broadwood Parkway	HILLSBORO	97124	45.5573	-122.826	505463	5044835	1.61	99	899	39	289	14	114	9	109	39	39	22.475	7.03E+02	57.8	3.13E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	2071	9					
NWR	41067	34	WASHINGTON	341086	Beaver Ventures LLC	5675 NE 62nd Ave	Hillsboro	97124	44.566	-122.516	506555	5045832	2.34	99	899	39	289	14	114	9	109	39	39	22.475	7.10E+02	57.8	4.04E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	5845	9					
NWR	41067	34	WASHINGTON	341038	RAMCO Hillsboro LLC	6231 NE Croton Ave	Hillsboro	97124	45.5649	-122.906	507667	5047111	2.41	99	899	39	289	14	114	9	109	39	39	22.475	7.017371	57.8	4.81E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	6102	9					
NWR	41067	34	WASHINGTON	341226	INT Global Systems Center, LLC	11400 NE Broadwood Road	Hillsboro	97124	45.5573	-122.813	502131	5044025	4.30	99	899	39	289	14	114	9	109	39	39	22.475	7.03E+02	57.8	4.81E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	2084	9					
NWR	41067	34	WASHINGTON	341273	Clean Water River Road	3215 SW RIVER ROAD	HILLSBORO	97123	45.4977	-122.849	503066	5034948	5.59	99	899	39	289	14	114	9	109	39	39	22.475	7.04889	60.4	9.25E+02	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	6293	9					
NWR	41067	34	WASHINGTON	341004	Hillboro Landfill Inc.	3205 SE WINTER BRIDGE ROAD	BEAVERTON	97113	45.4931	-122.977	502244	5037386	7.34	99	899	39	289	14	114	9	109	39	39	22.475	8.012453	57.8	1.209318	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1818	9					
NWR	41067	34	WASHINGTON	341204	AWing Electric, Inc.	14320 SW ERVINE RD	BEAVERTON	97005-8155	45.4567	-122.826	511703	5029745	8.75	99	899	39	289	14	114	9	109	39	39	22.475	8.35E+02	57.8	1.607711	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	2064	9					
NWR	41067	34	WASHINGTON	341208	Traktronix, Inc.	14150 SW KAN BRAUN DR	BEAVERTON	97007	45.499	-122.818	514003	5030812	9.14	99	899	39	289	14	114	9	109	39	39	22.475	8.408225	61.6	1.048432	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1859	9					
NWR	41067	34	WASHINGTON	341221	Rohb River Corporation North	21880 NW FARMINGTON RD	BEAVERTON	97007-6470	45.4566	-122.886	507818	5034057	9.55	99	899	39	289	14	114	9	109	39	39	22.475	8.408225	61.6	1.048432	22.8	4.77E+02	21.8	4.99E+02		No	No	Yes	Yes	Standard	Active	1907	9					
NWR	41067	34	WASHINGTON	341273	Bimbo Bakeries USA, Inc.	10750 SW 5TH ST	BEAVERTON	97005	45.4811	-122.787	516615	5036641	12.30	99	899	39	289	14	114	9	109	39	39	22.475	8.547469	57.8	1.212375	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	2030	9					
NWR	41067	34	MULTNOMAH	263067	Dwain Corning Roofing and	11510 NW SAINT HELENS RD	PORTLAND	97231-2396	45.6061	-122.789	516575	5050739	12.32	157	957	39	289	14	114	9	109	106	83	39	22.475	8.551448	57.8	1.212324	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1333	9				
NWR	41067	34	WASHINGTON	341276	DMN, Inc.	3850 & 3808 34TH AVE	FOREST GROVE	97116	45.5247	-123.081	493792	5040722	12.95	99	899	39	289	14	114	9	109	39	39	22.475	8.551448	57.8	1.212324	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	2006	9					
NWR	41067	34	WASHINGTON	341009	International Paper Company	5500, 5570, & 5800 SW WESTERN AVE	BEAVERTON	97005-4116	45.4801	-122.782	511734	5036298	12.98	99	899	39	289	14	114	9	109	39	39	22.475	8.551448	57.8	1.212324	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	1873	9					
NWR	41067	34	MULTNOMAH	262489	Kindig Knives Bulk Terminal	11600N LOMBARD ST	PORTLAND	97203	45.6017	-122.774	517697	5047612	13.07	99	899	39	289	14	114	9	109	39	39	22.475	8.551448	57.8	1.212324	22.8	4.77E+02	21.8	4.99E+02		No	No	Yes	Yes	Standard	Active	1290	9					
NWR	41067	34	MULTNOMAH	263002	Sitonic Corporation	7200 NW FRONT AVE	PORTLAND	97210-9676	45.5775	-122.755	519099	5047736	13.21	99	899	83	333	12	112	12	112	112	54	22.475	8.57732	66.6	1.918338	22.4	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1299	9					
NWR	41067	34	MULTNOMAH	261278	TTM Technologies North Amer	1521 PORTLAND AVE	FOREST GROVE	97116-2033	45.5134	-123.081	493462	5039988	13.23	99	899	39	289	14	114	9	109	39	39	22.475	8.578878	57.8	1.238937	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	1971	9					
NWR	41067	34	MULTNOMAH	261282	Northwest Print Company	2300S N BURGARD WAY	PORTLAND	97203	45.609	-122.773	517669	5050621	13.24	99	899	39	289	28	128	18	118	95	39	22.475	8.578878	57.8	1.238937	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1293	9					
NWR	41067	34	MULTNOMAH	261181	Ash Grove Cement Company	13939N RIVERGATE BLVD	PORTLAND	97203	45.6229	-122.784	517151	5051852	13.61	99	899	39	289	42	142	21	121	39	39	22.475	8.605738	57.8	1.253556	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1119	9					
NWR	41067	34	MULTNOMAH	261189	I. R. Simplot Company	1401N RIVERGATE BLVD	PORTLAND	97203-6214	45.6248	-122.785	518745	5052384	13.64	99	899	39	289	14	114	9	109	39	39	22.475	8.605738	57.8	1.253556	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	Yes	Yes	Standard	Active	1117	9					
NWR	41067	34	MULTNOMAH	261028	Hexion Inc.	3201S N LOMBARD ST	PORTLAND	97203	45.6055	-122.766	518270	5052044	13.65	99	899	39	289	14	114	9	109	39	39	22.475	8.607468	57.8	1.236206	22.8	4.77E+02	21.8	4.99E+02		Yes	Yes	No	No	Standard	Active	876	9					



26-1876	EU7	P-1	Boiler	0.945	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5631	-122.5647	Owens Brockway Glass Container Inc.
26-1876	EU7	P-2	Boiler	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5631	-122.5647	Owens Brockway Glass Container Inc.
26-1876	EU4	P-3	FURNACE	81	STK-1	Furnace A stacks	71.4	3.1	336.7	50.7	22960.03	45.4623	-122.6143	Owens Brockway Glass Container Inc.
26-1876	EU4	P-1	FURNACE	66.3	STK-1	Furnace A stacks	71.4	3.1	336.7	50.7	22960.03	45.4623	-122.6143	Owens Brockway Glass Container Inc.
26-1885	BOILER	P-1	NG BOILER	1.86	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5394	-122.7122	Zinkowport Portland LLC
26-1889	NG COMB	P-1	GAS COMBUSTION	0.12	RP-GS	Default parameters for release po	40	5	72	40	47100	45.6248	-122.7852	J. R. Simplot Company
26-1891	PRODUCTION	P-1	Production	1.41	RP-GS	Default parameters for release po	40	5	72	40	47100	45.6229	-122.7838	Ash Grove Cement Company
26-1894	NG	P-1	NATURAL GAS	9.11	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5911	-122.7001	Herbert Malarkey Roofing Company
26-1894	OVEN	P-1	Fiberglass Mat Curing Oven	2.33	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5911	-122.7001	Herbert Malarkey Roofing Company
26-1917														Portland Sand and Gravel Company
26-1941														Ross Island Sand & Gravel Co.
26-2013														Grain Craft
26-2025	BOIL/FURN	P-1	Boilers and furnaces	1.94	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5607	-122.7369	Zenith Energy Terminals Holdings, LLC
26-2025	BOIL/FURN	P-2	Boilers and furnaces	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5607	-122.7369	Zenith Energy Terminals Holdings, LLC
26-2025	BOIL/FURN	P-3	Boilers and furnaces	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5607	-122.7369	Zenith Energy Terminals Holdings, LLC
26-2028	BOILER	P-1	Boilers	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5625	-122.7437	Kinder Morgan Liquids Terminals LLC
26-2028	BOILER	P-2	Boilers	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5625	-122.7437	Kinder Morgan Liquids Terminals LLC
26-2043	NG COMB	P-1	NATURAL GAS COMBUSTION	2.43	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5688	-122.7473	CertainTeed Corporation
26-2043	OIL COMB	P-1	OIL COMBUSTION	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5688	-122.7473	CertainTeed Corporation
26-2050	AI	P-1	Aggregate Insignificant Activities	1	RP-PS	Default parameters for release po	20	50	72	7	824667.9	45.4991	-122.6853	Oregon Health and Sciences University
26-2050	EU1	P-1	Boiler 2	0.022	STK-1	Boiler 2 - EU 1 Exhaust duct is rect	214	12	385	22	149288.45	45.4991	-122.6853	Oregon Health and Sciences University
26-2050	EU1	P-2	Boiler 2	0	STK-1	Boiler 2 - EU 1 Exhaust duct is rect	214	12	385	22	149288.45	45.4991	-122.6853	Oregon Health and Sciences University
26-2050	EU2	P-1	Boiler 5	0.594	STK-2	Boiler 5 - EU2	31.3	5	539	20	23561.94	45.4991	-122.6853	Oregon Health and Sciences University
26-2050	EU2	P-2	Boiler 5	0.011	STK-2	Boiler 5 - EU2	31.3	5	539	20	23561.94	45.4991	-122.6853	Oregon Health and Sciences University
26-2050	EU3	P-1	Boiler 6 and 7	7.02	STK-3	Boiler 6 - EU3	31	3.5	347	34	19627.1	45.4991	-122.6853	Oregon Health and Sciences University
26-2050	EU3	P-2	Boiler 6 and 7	0.025	STK-3	Boiler 6 - EU3	31	3.5	347	34	19627.1	45.4991	-122.6853	Oregon Health and Sciences University
26-2068	3U-10	P-1	NG	2.42	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5374	-122.7073	ESCO Group, LLC
26-2068	3U-1	P-1	MELT	8.27	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7029	ESCO Group, LLC
26-2068	3U-1	P-2	MELT	0.436	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7029	ESCO Group, LLC
26-2068	3U-1	P-3	MELT	0.133	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7029	ESCO Group, LLC
26-2068	3U-1	P-4	MELT	0.133	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7029	ESCO Group, LLC
26-2068	3U-1	P-5	MELT	0.00214	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7029	ESCO Group, LLC
26-2068	3U-3	P-1	MH/SR	0.895	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5374	-122.7073	ESCO Group, LLC
26-2068	3U-2	P-1	PCS	0.037	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5374	-122.7073	ESCO Group, LLC
26-2068	3U-2	P-2	PCS	0.00193	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5374	-122.7073	ESCO Group, LLC
26-2068	3U-2	P-3	PCS	0.000115	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5374	-122.7073	ESCO Group, LLC
26-2068	3U-2	P-4	PCS	0.000115	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5374	-122.7073	ESCO Group, LLC
26-2197	8-AGG	P-1	Aggregate Insignificant Activities	1	RP-PS	Default parameters for release po	20	50	72	7	824667.9	45.5728	-122.7152	Damler Trucks North America, LLC
26-2197	5-BO	P-1	Natural Gas Combustion Devices	3.51	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5728	-122.7152	Damler Trucks North America, LLC
26-2197	6-CUT	P-1	Metal Cutting	0	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5728	-122.7152	Damler Trucks North America, LLC
26-2204	COMBUSTION	P-1	NATURAL GAS EXTERNAL COMBU!	9.08	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5431	-122.4654	Boeing Company (The)
26-2290	NG COMB	P-1	NATURAL GAS COMBUSTION	3.69	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6157	-122.7145	Supreme Perlite Company
26-2426														David Douglas 5th St Bldg
26-2492	AI	P-1	Aggregate Insignificant Activities	1	RP-PS	Default parameters for release po	20	50	72	7	824667.9	45.6099	-122.7734	Northwest Pipe Company
26-2492	5-NG	P-1	Natural Gas Combustion Devices	0.713	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6099	-122.7734	Northwest Pipe Company
26-2545														Review Abbey Mausoleum Co.
26-2557														Blasen & Blasen Lumber Corp.
26-2579	AI	P-1	Aggregate Insignificant Activities	1	RP-PS	Default parameters for release po	20	50	72	7	824667.9	45.6119	-122.7022	ALSCO Inc., A Corporation of Nevada
26-2777	BLRS/DRYER	P-1	Boilers and Dryers	2.45	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6119	-122.7022	Graphic Packaging International, Inc
26-2777	BLRS/DRYER	P-2	Boilers and Dryers	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6119	-122.7022	Graphic Packaging International, Inc
26-2778														Graphic Packaging International, Inc
26-2784														Lewis & Clark College
26-2832	FS-2	P-1	TURBINE	0.258	STK-1		30	2	350	25	4712.39	45.5098	-122.6813	The Reed Institute
26-2914	BLRS	P-2	BOILERS	3.86	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5871	-122.5889	Portland State University
26-2914	BLRS	P-1	BOILERS	2.7	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5871	-122.5889	Port of Portland
26-2914	FLARE	P-1	DICING FLARE	0.07	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5871	-122.5889	Port of Portland
26-2914	LARGE GENS	P-1	GENERATORS OVER 600 HP	0.000267	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5871	-122.5889	Port of Portland
26-2914	SMALL GENS	P-1	GENERATORS UNDER 600 HP	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5871	-122.5889	Port of Portland
26-2926														Lepsey Good Samaritan Hospital and Medical Center
26-2944	AGG	P-1	Aggregate insignificant emissions	1	RP-PS	Default parameters for release po	20	50	72	7	824667.9	45.5538	-122.7195	Gundersen LLC
26-2944	4-NG	P-1	Natural gas combustion devices	0.85	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5538	-122.7195	Gundersen LLC
26-2944	3-TC	P-1	Plasma/Oxy-fuel metal cutting dev	0.079	RP-GS	For GS-3, there are actually multi	40	5	72	40	47100	45.5538	-122.7195	Gundersen LLC
26-2944	3-TC	P-2	Plasma/Oxy-fuel metal cutting dev	0.058	RP-GS	For GS-3, there are actually multi	40	5	72	40	47100	45.5538	-122.7195	Gundersen LLC
26-2944	3-TC	P-3	Plasma/Oxy-fuel metal cutting dev	0.000705	RP-GS	For GS-3, there are actually multi	40	5	72	40	47100	45.5538	-122.7195	Gundersen LLC
26-2949														The Portland Memorial Inc
26-2952	OVENS NG	P-1	NATURAL GAS FOR THE OVENS	2.58	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5257	-122.6545	United States Bakery
26-2952	BOILERS	P-1	Boiler	1.19	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5257	-122.6545	United States Bakery
26-2952	BOILERS	P-2	Boiler	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5257	-122.6545	United States Bakery
26-2968	OVENS	P-1	OVENS NATURAL GAS	7.16	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5818	-122.6638	Mondelez Global LLC
26-2968	BOILER	P-1	BOILER	3.37	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5818	-122.6638	Mondelez Global LLC
26-2968	BOILER	P-2	BOILER	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5818	-122.6638	Mondelez Global LLC
26-3002	BOILERS	P-1	NATURAL GAS BOILERS	0.733	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5775	-122.7552	Siltronc Corporation
26-3002	GEN	P-1	DIESEL GENERATORS	0.242	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5775	-122.7552	Siltronc Corporation
26-3002	NG COMBUSTIO	P-1	OTHER BOILERS AND TO	0.085	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5775	-122.7552	Siltronc Corporation
26-3002	SCRUBBER	P-1	NOX SCRUBBER	0.000007	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5775	-122.7552	Siltronc Corporation
26-3009	AI	P-1	Aggregate Insignificant Activities	1	RP-PS	Default parameters for release po	20	50	72	7	824667.9	45.5888	-122.6908	Arclin Surfaces, Inc.
26-3009	EU-4	P-1	Boilers	3.35	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5888	-122.6908	Arclin Surfaces, Inc.
26-3009	EU-2	P-2	Coating Line 3	8.61	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5888	-122.6908	Arclin Surfaces, Inc.
26-3009	EU-2	P-3	Coating Line 3	2.46	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5888	-122.6908	Arclin Surfaces, Inc.
26-3009	EU-2	P-1	Coating Line 2	1.56	RP-GS	Default parameters for release po	40	5	72	40	47100	45.5888	-122.6908	Arclin Surfaces, Inc.
26-3021	HTR-3	P-1	HEATER #3	2.11	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6062	-122.6938	Ecolube Recovery LLC
26-3021	BLRS 1,2	P-1	BOILERS	0.354	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6062	-122.6938	Ecolube Recovery LLC
26-3021	TO-01	P-1	THERMAL OXIDIZER	0.344	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6062	-122.6938	Ecolube Recovery LLC
26-3021	HTR-4	P-1	HEATER #4	0	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6062	-122.6938	Ecolube Recovery LLC
26-3021	PESCO	P-1	REFINERY	0.0000315	RP-GS	Default parameters for release po	40	5	72	40	47100	45.6062	-122.6938	Ecolube Recovery LLC
26-3021	QPS-1	P-1	OIL POLISHING SYSTEM	0	RP-GS	Default parameters for release po	40	5	72	40	47100	45.6062	-122.6938	Ecolube Recovery LLC
26-3038	NG COMB	P-1	NATURAL GAS COMBUSTION SOU	5.45	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5387	-122.5778	Cascade Corporation
26-3038	EG-1	P-1	EMERGENCY GENERATOR	0.057	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5387	-122.5778	Cascade Corporation
26-3048	BLR	P-1	BOILER	2.18	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6135	-122.7111	Oil Re-Refining Company Inc.
26-3048	TK HEATERS	P-1	COOK TANK HEATERS	2.18	RP-GSF	Default parameters for release po	60	8	300	37	111600	45.6135	-122.7111	Oil Re-Refining Company Inc.
26-3048	ROCKET	P-1	ROCKET SYSTEM	0	RP-GS	Default parameters for release po	40	5	72	40	47100	45.6135	-122.7111	Oil Re-

26-3254	ETC	P-1	Engine Test Cell	0.012 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5749	-122.5914	Oregon Air National Guard
26-3254	GEN NE	P-1	Emergency Generator	0.000256 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5749	-122.5914	Oregon Air National Guard
26-3254	GEN SE	P-1	Emergency Generator	0.000256 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5749	-122.5914	Oregon Air National Guard
26-3254	GEN NW	P-1	Emergency Generator	0.000256 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5749	-122.5914	Oregon Air National Guard
26-3254	GEN SW	P-1	Emergency Generator	0.000256 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5749	-122.5914	Oregon Air National Guard
26-3265													Glacier Northwest, Inc.
26-3267	GENS	P-1	GENS	4.91 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5465	-122.4805	U.S. Bancorp
26-3291	NG COMB	P-1	NATURAL GAS COMBUSTION	1.98 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5779	-122.614	The Boeing Company
26-3291	FP	P-1	FIRE PUMPS	0.917 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5779	-122.614	The Boeing Company
26-3291	GENS	P-1	GENERATORS	0.328 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5779	-122.614	The Boeing Company
26-3305													Lakeside Industries, Inc.
26-3310	Landfill	P-1	Landfill Gas Flares	1.41 RP-GS	Default parameters for release po	40	5	72	40	47100	45.6142	-122.7516	Metropolitan Service District
26-3317	NG	P-1	NATURAL GAS COMBUSTION	0.244 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.574	-122.6	Silver Eagle Manufacturing Co.
26-9535													Caldmar Materials, Inc.
26-9537	EUS	P-1	Space Heaters	0.364 RP-GSF	Default parameters for release po	60	8	300	37	111589.35	45.5406	-122.4737	Owens Corning Fiberglas Insulation, LLC
26-9545													Regency Portland
26-9550	ENGS	P-1	ENGS	0.27 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4959	-122.6483	Portland General Electric Company
34-0001													Peterkort Roses, L.L.C.
34-0002													Legacy Meridian Park Hospital
34-0004	FLARE	P-1	FLARE	7.24 RP-FS	Default parameters for release po	20	50	72	7	824667.9	45.493	-122.87	Hillboro Landfill Inc.
34-0004	TUB GRIND	P-1	TUB GRINDER	7.88 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.493	-122.87	Hillboro Landfill Inc.
34-0004	TIPPER	P-1	TIPPER	4 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.493	-122.87	Hillboro Landfill Inc.
34-0005	NG	P-1	NATURAL GAS COMBUSTION	2.33 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.3839	-122.7779	Valmont Coatings, Inc.
34-0009	NG COMB	P-1	NATURAL GAS COMBUSTION	2.08 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4801	-122.7821	International Paper Company
34-0017	NG COMB	P-1	Natural Gas	0.757 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5467	-122.9327	Dynic USA Corp.
34-0048													Cascade Forest Directors
34-0055	NG COMB	P-1	NATURAL GAS COMBUSTION	2.5 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5413	-122.9374	Qorvo US, Inc.
34-0063	BLRS	P-1	BOILERS	2.97 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.386	-122.792	Lam Research Corporation
34-0070	CRE	P-1	CREMATORY	0.225329315 RP-GSF	Default parameters	60	8	300	37	111600	45.4901	-122.8672	Springer & Son, Inc.
34-0079	CR	P-1	COFFEE ROASTER	0.108638862 RP-GSF	Default parameters	60	8	300	37	111600	45.5665	-122.8985	West Coast Coffee Company
34-0080	GEN	P-1	GENERATOR	0.018112752 RP-GSF	Default parameters	60	8	300	37	111600	45.5413	-122.9374	Qorvo US, Inc.
34-0083	GEN	P-1	GENERATOR	0.8247771 RP-GSF	Default parameters	60	8	300	37	111600	45.5227	-122.9904	Pesential Colorado Corp.
34-0090													Finley-Sunset Hills Mortuary
34-0096	GEN	P-1	GENERATOR	0.21616707 RP-GSF	Default parameters	60	8	300	37	111600	45.5323	-122.9382	Clean Water Services / Clean Water Institute
34-0101													Landmark Ford, Inc.
34-0134	NG	P-1	NATURAL GAS COMBUSTION	0.51 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.3667	-122.7849	Arden Mills, LLC
34-0142	GEN	P-1	GENERATOR	0.283917383 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5408	-122.9919	City of Hillsboro
34-0149	ENG	P-1	AVERY GENERATOR DSG	0.0000465 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.3716	-122.7879	Portland General Electric Company
34-0157	EMGEN	P-1	EM GEN 1-16	0.491 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5471	-122.9287	STACK Infrastructure, Inc.
34-0157	LSGEN	P-1	LS GEN 1-3	0.0018 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5471	-122.9287	STACK Infrastructure, Inc.
34-0183	GEN	P-1	GEN	20.9 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5509	-122.9207	STACK Infrastructure, Inc.
34-0186	GEN	P-1	GENERATOR	21.6274884 RP-GSF	Default parameters	60	8	300	37	111600	45.566	-122.916	Beaver Ventures LLC
34-0222	ENGS	P-1	ENGS	2.05 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5571	-122.9722	ES Investments Properties Hillsboro, LLC
34-0235	GENS 101-111	P-1	EMERGENCY GENERATORS	0.977 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.55	-122.9727	NTT Global Data Centers H, LLC
34-0235	GEN 1H	P-1	EMERGENCY GENERATOR 1H	0.09 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.55	-122.9727	NTT Global Data Centers H, LLC
34-0238	NOT RUNNING			0									KoMico Hillsboro LLC
34-0241	GENI-3	P-1	GENERATORS 1-3	0.89 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.557	-122.9227	Pesential Colorado Corp
34-0241	GENS-10	P-1	GENERATORS 5-10	0.734 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.557	-122.9227	Pesential Colorado Corp
34-0241	GEN4	P-1	GENERATOR 4	0.348 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.557	-122.9227	Pesential Colorado Corp
34-2066	H-BLR	P-2	Hog Fuel Boilers	22.8 STK-1		114.8	5.6	357	38.7	57191.05	45.4673	-123.1881	Stimson Lumber Company
34-2066	H-BLR	P-1	Hog Fuel Boilers	13.9 STK-1		114.8	5.6	357	38.7	57191.05	45.4673	-123.1881	Stimson Lumber Company
34-2510	NO NOX			0									Jewett-Cameron Seed Company
34-2565													Hampton Lumber Mills - Banks Inc.
34-2584													Woodfield Hqs, Inc.
34-2585													Providence St. Vincent Medical Center
34-2623	GENS	P-1	GENERATORS	29.1 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4008	-122.7619	Clean Water Services
34-2623	HEATERS	P-1	HEATERS	0.34 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4008	-122.7619	Clean Water Services
34-2623	BLRS	P-1	BOILERS	0.048 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4008	-122.7619	Clean Water Services
34-2623	BLRS	P-2	BOILERS	0.019 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4008	-122.7619	Clean Water Services
34-2623	FLARES	P-1	FLARES	0.000987 RP-GS	Default parameters for release po	40	5	72	40	47100	45.4008	-122.7619	Clean Water Services
34-2636													Rogers Northwest, Inc.
34-2638	NG COMB	P-1	NATURAL GAS COMBUSTION	2.54 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.499	-122.8179	Tektronix, Inc.
34-2639	BLR	P-1	BOILER	1.11	DEFAULT PARAMETERS	60	8	300	37	111600	45.567	-122.8605	Portland Community College
34-2640													Wilsonville Concrete Products
34-2674													Knife River Corporation - Northwest
34-2678	NG	P-1	NATURAL GAS COMBUSTION	1.7 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5134	-123.0814	TTM Technologies North America, LLC
34-2688													Oregon-Canadian Forest Products, Inc.
34-2750	CR	P-1	COFFEE ROASTER	0.088678881 RP-GSF	Default parameters	60	8	300	37	111600	45.5556	-122.919	Longbottom Coffee & Tea Inc.
34-2753	FLARES	P-1	FLARES DIGESTER GAS	0.52 RP-FS	Default parameters for release po	20	50	72	7	824667.9	45.4977	-122.9492	Clean Water Services
34-2753	GENS	P-1	ENGINE GENERATORS DIGESTER G	40.9 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4977	-122.9492	Clean Water Services
34-2753	NG COMB	P-1	NATURAL GAS COMBUSTION	1.21 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4977	-122.9492	Clean Water Services
34-2753	BLRS	P-1	BOILERS DIGESTER GAS	0.173 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4977	-122.9492	Clean Water Services
34-2769	C	P-1	CONCRETE	0.016933462 RP-GSF	Default parameters	60	8	300	37	111600	45.5375	-122.8969	Glacier Northwest, Inc.
34-2775													Knife River Corporation - Northwest
34-2783	BO	P-1	NATURAL GAS BAKE OVENS NG CC	1.91 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4831	-122.7874	Bimbo Bakeries USA, Inc.
34-2783	BLR	P-1	SUPERIOR NG BOILER	1.49 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.4831	-122.7874	Bimbo Bakeries USA, Inc.
34-2790	NG	P-1	COMBUSTION	1.99 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5519	-122.9244	Tokyo Ohka Kogyo America, Inc.
34-2804	BLRS	P-2	NG BOILERS	1.05 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5021	-122.8246	Analog Devices, Inc.
34-2804	BLRS	P-1	NG BOILERS	0.465 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5021	-122.8246	Analog Devices, Inc.
34-2804	ENG B59	P-1	ENGINE BUILDING 59	0.103 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5021	-122.8246	Analog Devices, Inc.
34-2804	ENG B57	P-1	ENGINE BUILDING 57	0.063 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5021	-122.8246	Analog Devices, Inc.
34-2804	ENG B60	P-1	ENGINE BUILDING 60	0.101 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5021	-122.8246	Analog Devices, Inc.
34-2813	BLRS	P-1	BOILERS 1-5	0.949 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5465	-122.9306	Jireh Semiconductor Incorporated
34-2813	ENG 1-3	P-1	ENGINES 1-3	0.176 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5465	-122.9306	Jireh Semiconductor Incorporated
34-2813	ENG 4	P-1	ENGINE 4	0.021 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5465	-122.9306	Jireh Semiconductor Incorporated
34-9507	BLR 1-2	P-1	BOILERS 1-2	2.35 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5572	-122.9262	Genentech, Inc.
34-9507	ES2	P-2	EMERGENCY GEN 2	0.095 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5572	-122.9262	Genentech, Inc.
34-9507	BLR 3-5	P-1	BOILERS 3-5	0.094 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5572	-122.9262	Genentech, Inc.
34-9507	EG1	P-2	EMERGENCY GEN 1	0.052 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5572	-122.9262	Genentech, Inc.
34-9507	FWP	P-2	FIRE WATER PUMP	0.031 RP-GSF	Default parameters for release po	60	8	300	37	111600	45.5572	-122.9262	Genentech, Inc.
34-9514	PO	P-1	PROCESS OPERATIONS	0.78 RP-GS	Default parameters for release po	40	5	72	40	47100	45.4256	-122.7594	Regenyx LLC
34-9514	NG	P-1	NATURAL GAS COMBUSTION	0.55 RP-GS	Default parameters for release po	40	5	72	40	47100	45.4256	-122.7594	Regenyx LLC
34-9514	PROPANE	P-1	PROPANE COMBUSTION	0 RP-GS	Default parameters for release po	40	5	72	40	47100	45.4256	-122.7594	Regenyx LLC
36-0001													Fulton-Rose & Mortuary Chapels, Inc.
36-0007													UFP McMinnville, LLC
36-0011	AI	P-1	Aggregate Insignificant	1 RP-FS	Default parameters for release po	20	50	72	7	824667.9	45.1606	-123.2444	Riverbend Landfill Co.
36-0011	TIP	P-1	Tipper	0 RP-FS	Default parameters for release po	20	50	72	7	824667.9	45.1606	-123.2444	Riverbend Landfill Co.
36-0011	FLRN	P-1	Enclosed flare	30.3 STK-2		30	6.3	640.6	27.5	51434.54	45.1606	-123.2444	Riverbend Landfill Co.
36-0011	ENG	P-1	Engines (6)	40.4 STK-1		32	5	1200	29179	45.1606			

SourceNumber	ESCode	ProcessCode	ESDescription	CO	PM10	PM2.5	ReleasePointCode	ReleasePointDescription	Height	Diameter	ExitGasTemperature	ExitGasVelocity	ExitGasFlowRate	Latitude	Longitude
26-2008	3U-2	P-1	PCS	50.6	1.14	1.14	RP-GSF	Default parameters for release	40	5	72	40	47100	45.5374	-122.7291
26-1865	EU10	P-1	Leak To NG source	42.1	0.417	0.417	STK-2	Default parameters for release	78.9	4.4	389.3	2	41000	45.5376	-122.7794
26-3067	EU1	P-2	Ashfall Conveyer	40.7	3.05	3.05	RP-GSF	Default parameters for release	40	5	72	40	47100	45.6061	-122.7803
34-0004	FLARE	P-1	FLARE	38.4	1.81	1.81	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.4991	-122.7774
26-1865	EU-10	P-1	Reheat Furnace	34.5	3.48	3.48	STK-1	Default parameters for release	72.7	5.7	702.3	24.7	37817.06	45.6256	-122.7794
26-1894	CL	P-1	Coater and Lamin	21.1	0.242	0.242	STK-1	Default parameters for release	40	5	72	40	47100	45.5911	-122.7001
26-2068	3U-1	P-1	MELT	38.1	0.242	0.242	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7020
34-2753	GENS	P-1	ENGINE GENERAT	19	0.657	0.657	RP-GSF	Default parameters for release	60	8	300	37	111600	45.4977	-122.9492
26-1865	EU-13	P-1	Other Natural Gas	14.1	1.27	1.27	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6256	-122.7794
34-0183	GEN	P-1	GEN	12.1	0.698	0.698	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5499	-122.9207
26-3067	EU2	P-2	Boilers & Pre-heat	6.58	0.195	0.195	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6061	-122.7803
26-1815	COATER	P-1	Asphalt Coater	6.08			RP-GSF	Default parameters for release	40	5	72	40	47100	45.5493	-122.7219
26-1894	NG	P-1	NATURAL GAS	5.47			RP-GSF	Default parameters for release	60	8	300	37	111600	45.5911	-122.7001
26-3009	EU-2	P-2	Coating Line 3	5.37			RP-GSF	Default parameters for release	40	5	72	40	47100	45.5888	-122.6908
26-0100	BLRS	P-1	BLRS	4.96	0.148	0.148	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5965	-122.7176
34-2753	FLARES	P-1	FLARES DIGESTER	4.47	0.162	0.162	RP-FS	Default parameters for release	60	8	300	37	111600	45.4977	-122.9492
26-1865	EU-23	P-1	Coil Furnaces	3.78	0.342	0.342	RP-GSF	Default parameters for release	40	5	72	40	47100	45.6256	-122.7794
26-1869	STEEL	P-1	Steel Arc Furnaces	3.35	0.266	0.266	RP-GSF	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-2050	EU3	P-1	Boiler & 6 and 7	3.27	0.566	0.566	STK-3	Boiler 6- EU3	31	3.5	347	34	19627.1	45.4991	-122.6853
26-2300	NG COMB	P-1	NATURAL GAS COMB	3.1			RP-GSF	Default parameters for release	60	8	300	37	111600	45.6157	-122.7145
26-3067	EU3	P-1	Storage Tanks 1-2	3.03	0.1	0.1	RP-GSF	Default parameters for release	40	5	72	40	47100	45.6061	-122.7891
34-2804	BLRS	P-2	NG BOILERS	2.76	0.082	0.082	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6021	-122.8246
15-2043	TK 18B19	P-1	Asphalt Storage Ta	2.74			RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5493	-122.7191
26-2068	3U-2	P-2	PCS	2.66	1.08	1.08	RP-GSF	Default parameters for release	40	5	72	40	47100	45.5374	-122.703
26-1891	PRODUCTION	P-1	Production	2.5	2.58			Default parameters for release	40	5	72	40	47100	45.6229	-122.9306
34-2813	BLRS	P-1	Boilers 1-5	2.49			RP-GSF	Default parameters for release	60	8	300	37	111600	45.5465	-122.7891
26-0100	BLRS	P-2	BLRS	2.41	0.071	0.071	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5965	-122.7176
26-1865	EU-21	P-1	Heat Treat Process	2.32	0.464	0.464	RP-GSF	Default parameters for release	40	5	72	40	47100	45.6256	-122.7794
34-2638	NG COMB	P-1	NATURAL GAS COMB	2.14	0.064	0.064	RP-GSF	Default parameters for release	60	8	300	37	111600	45.499	-122.8179
34-0055	NG COMB	P-1	NATURAL GAS COMB	2.1	0.063	0.063	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5413	-122.9374
26-2777	BLRS/RFRYER	P-1	Boilers and Dryers	2.06	0.061	0.061	RP-GSF	Default parameters for release	60	8	300	37	111600	45.518	-122.7022
26-2043	NG COMB	P-1	NATURAL GAS COMB	2.04	0.184	0.184	RP-GSF	Default parameters for release	60	8	300	37	111600	45.568	-122.7441
26-2068	3U-10	P-1	NG	2.03	0.061	0.061	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5374	-122.703
34-0004	TUB GRIND	P-1	TUB GRINDER	1.8	0.23	0.23	RP-GSF	Default parameters for release	60	8	300	37	111600	45.493	-122.97
26-1815	NG COMB	P-1	Natural Gas Comb	1.66	0.15	0.15	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5493	-122.7191
26-2025	BOIL/FURN	P-1	Boiler & Furnace	1.63	0.691	0.691	RP-GSF	Default parameters for release	40	5	72	40	47100	45.5493	-122.7891
34-2783	BO	P-1	NATURAL GAS BAK	1.6	0.048	0.048	RP-GSF	Default parameters for release	60	8	300	37	111600	45.4831	-122.7874
26-1895	BOILER	P-1	NG BOILER	1.58			RP-GSF	Default parameters for release	60	8	300	37	111600	45.5394	-122.7122
26-1814	BOILER	P-1	Boiler	1.56	0.047	0.047	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5473	-122.709
15-2043	CO GRIND	P-1	ASPHALT COATER	1.52	0.242	0.242	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5493	-122.7191
34-0186	GEN	P-1	GENERATOR	1.5038982	1.5038982	4.654923		DEFAULT	60	8	300	37	111600	45.566	-122.916
34-2678	NG	P-1	NATURAL GAS COMB	1.47			RP-GSF	Default parameters for release	60	8	300	37	111600	45.5134	-123.0184
26-2998	OVENS	P-1	OVENS NATURAL G	1.43	0.179	0.179	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5818	-122.6638
26-3124	CUB	P-1	Boilers 12	1.41	0.101	0.101	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5493	-122.7191
26-0388	NGC	P-1	NATURAL GAS	1.37	0.124	0.124	RP-GSF	Default parameters for release	40	5	72	40	47100	45.6242	-122.777
26-1894	OVEN	P-1	Fiberglass Mat	1.34			RP-GSF	Default parameters for release	40	5	72	40	47100	45.5911	-122.7001
34-9507	BLR 1-2	P-1	BOILERS 1-2	1.34	0.336	0.336	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5572	-122.9262
15-2183	BL 1-3	P-1	SUPERHEAT NG BOI	1.25	0.017	0.017	RP-GSF	Default parameters for release	60	8	300	37	111600	45.615	-122.7814
26-3002	BOILERS	P-1	NATURAL GAS BOI	1.23	0.017	0.017	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5725	-122.7552
26-2068	3U-1	P-2	MELT	1.22	2.65	2.65	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7020
34-2804	BLRS	P-1	NG BOILERS	1.22	0.036	0.036	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6021	-122.8246
26-1869	NG COMB	P-1	Natural Gas Comb	1.1	0.111	0.111	RP-GSF	Default parameters for release	60	8	300	37	11158.35	45.5996	-122.7291
26-1865	AI	P-1	Aggregate Insignif	1	1	1	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7794
26-2050	AI	P-1	Aggregate Insignif	1	1	1	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.4991	-122.6853
26-2197	8-AGG	P-1	Aggregate Insignif	1	1	1	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5728	-122.7175
26-2777	AI	P-1	Aggregate Insignif	1	1	1	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5139	-122.7022
26-3009	ARE	P-1	Aggregate Insignif	1	1	1	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5966	-122.7022
26-1869	MANG	P-1	Manganese Arc Fu	0.936	0.968	0.968	RP-FS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
34-2639	BLR	P-1	BOILER	0.930594	0.0276925	0.0276925		DEFAULT	60	8	300	37	111600	45.567	-122.8605
34-0004	TIPPER	P-1	TIPPER	0.862	0.284	0.284	RP-GSF	Default parameters for release	60	8	300	37	111600	45.493	-122.977
26-3310	Landfill	P-1	Landfill Gas Flares	0.848	0.691	0.691	RP-GSF	Default parameters for release	40	5	72	40	47100	45.5493	-122.7191
26-2968	BOILER	P-1	BOILER	0.843	0.06	0.06	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5818	-122.6638
26-3009	EU-4	P-1	Boilers	0.836	0.06	0.06	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5888	-122.6908
26-2197	S-BO	P-1	Natural Gas Comb	0.738	0.422	0.422	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5728	-122.7152
34-0017	NG COMB	P-1	Natural Gas Comb	0.636			RP-GSF	Default parameters for release	60	8	300	37	111600	45.5493	-122.7191
26-3009	EU-2	P-3	Coating Line 3	0.614	0.044	0.044	RP-GSF	Default parameters for release	40	5	72	40	47100	45.5888	-122.6908
26-3048	BLR	P-1	BOILER	0.574	0.632	0.356	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6135	-122.7111
26-3048	TK HEATERS	P-1	COOK TANK HEAT	0.574	0.632	0.356	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6135	-122.7111
26-3021	HTG	P-1	HEATER 12	0.441	0.342	0.169	RP-GSF	Default parameters for release	60	8	300	37	111600	45.527	-122.6908
34-9514	NG	P-1	NATURAL GAS	0.462			RP-GSF	Default parameters for release	40	5	72	40	47100	45.6256	-122.7794
26-2043	SURFACING	P-1	SURFACING	0.379	0.069	0.069	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.568	-122.754
34-0157	EMGEN	P-1	EM GEN 1-16	0.312	0.055	0.055	RP-GSF	Default parameters for release	60	8	300	37	111600	45.4741	-122.9287
26-3021	BLR 2-3	P-1	BOILERS 2-3	0.288	0.088	0.088	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6061	-122.7814
26-3021	TO-01	P-1	THERMAL OXIDIZ	0.289	0.00859	0.00859	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6062	-122.6938
26-2068	3U-3	P-1	MH/SR	0.254	0.094	0.094	RP-GSF	Default parameters for release	40	5	72	40	47100	45.5374	-122.703
34-2753	NG COMB	P-1	NATURAL GAS COMB	0.254	0.03	0.03	RP-GSF	Default parameters for release	60	8	300	37	111600	45.4977	-122.9492
26-3067	EU1	P-1	Storage Tanks 7-10	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	47100	45.5493	-122.7891
34-0070	CRE RUN	P-1	CREMATORY	0.18927662	0.0403328	0.0403328		DEFAULT	60	8	300	37	111600	45.4901	-122.8672
34-0083	GEN	P-1	GENERATOR	0.17751825	0.0573205	0.0573205		DEFAULT	60	8	300	37	111600	45.5227	-122.9294
26-2068	3U-1	P-3	MELT	0.17	0.000558	0.000558	STK-1	MU-1 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7020
26-2068	3U-1	P-4	MELT	0.17	0.000558	0.000558	STK-1	MU-3 Melt EAF stack	55	7	80	32	73890.24	45.5373	-122.7020
34-9507	BLR 3-5	P-1	BOILERS 3-5	0.17	0.000558	0.000558	RP-GSF	Default parameters for release	60	8	300	37	111600	45.527	-122.9262
26-2043	HOR MIXER	P-1	HORIZONTAL MIXE	0.146	0.442	0.442	RP-FS	Default parameters for release	20	50	72	7	824667.9	45	



26-2028	BOLLER	P-1	Boilers	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5625	-122.7437
26-2028	BOLLER	P-2	Boilers	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5625	-122.7437
26-2043	Oil COMB	P-1	Oil COLLECTION	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	111600	45.568	-122.6833
26-2050	EUI	P-2	Boiler 2	0	0	0	STK-1	Boiler 2, EU-1 Exhaust duct in	214	12	385	22	149385	45.4991	-122.6853
26-2777	BLRS/DRYER	P-2	Boilers and Dryers	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6119	-122.7022
26-2988	BOLLER	P-2	Boilers	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5818	-122.6638
26-3021	HTC	P-1	HEATING	0	0	0	RP-GSF	Default parameters for release	60	8	300	37	111600	45.6024	-122.6938
26-3021	OPS-1	P-1	Oil POLISHING SYS	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6062	-122.6938
26-3048	ROCKET	P-1	ROCKET SYSTEM	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6135	-122.7111
26-3048	ROCKET	P-2	ROCKET SYSTEM	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6135	-122.7111
26-3087	EUI	P-1	Asphalt Converter	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6061	-122.7891
14-0238	DID NOT RUN			0	0	0									
34-9514	PROPANE	P-1	PROPANE COMBU	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.4256	-122.7594
26-0026	PRODUCTIN	P-2	PAINT PRODUCTION	0.117	0.117	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.6261	-122.7362
26-0146	G11.BF1	P-1	Railcar Loading	0.00486	0.00337	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G11.BF2	P-1	Reclaim Ashpit Dust Collector	0.00781	0.00221	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G11.BF3	P-1	Pipe Conveyor Receiving	0.067	0.0199	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G11.BF5	P-1	Tank Reclaim To Airlift Dust Coll	0.00173	0.000476	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G11.BF6	P-1	East Rail Loading Spout Dust Coll	0.00161	0.000447	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G14.BF1	P-1	Ship Unloading	0.211	0.06	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G14.BF2	P-1	Conveyance To Storage Tanks	1.03	0.029	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G14.BF3-5	P-1	North Terminal Storage Tanks	0.014	0.00381	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G14.BF6	P-1	Unload Airlift Airslide Dust Collect	0.00339	0.000847	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G21.BF2	P-1	Railcar Unloading	0.049	0.014	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G21.BF3	P-1	South Terminal Storage Silos	0.128	0.036	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G21.BF4	P-1	Truck Load-Out	0.228	0.064	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	G21.BF4	P-1	Pipe Conveyor Discharge	0.043	0.012	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5522	-122.6946
26-0146	FU1	P-1	FUGITIVE FROM SHIP	0.127	0.127	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5522	-122.6946
26-0242	A1	P-1	ASPIRATION	0.53	0.032	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5841	-122.6763
26-0242	A5	P-1	DRYER	0.186	0.011	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5841	-122.6763
26-0242	A6	P-1	DUST	0.221	0.013	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5841	-122.6763
26-0369	DRYERS	P-1	DRYERS	0.247	0.23	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6262	-122.7294
26-0369	DRYERS	P-2	DRYERS	1.83	1.17	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6262	-122.7294
26-1815	COOL SEC	P-1	Cooling Section	16.5	12.9	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5493	-122.719
26-1815	DUST SYS	P-1	DUST COLLECTOR SYSTEM	0.26	0.26	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5493	-122.719
26-1815	FBS	P-1	Filter Bed System	0.23	0.23	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5493	-122.719
26-1865	EUI-9	P-1	Material Handling	0.11	0.11	0	RP-GS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-11	P-1	Rolling Operations	5.19	5.19	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-12	P-1	Other Torching Operations	21.9	21.9	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6256	-122.7294
26-1865	EU-12	P-2	Other Torching Operations	4.5	4.5	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6256	-122.7294
26-1865	EU-13	P-1	Other Torching Operations	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6256	-122.7294
26-1865	EU-14	P-1	Paved Roads	33.7	8.30958004	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-15	P-1	Wind Erosion	4.79	0.7185	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-16	P-1	Coating Operations	0.21	1	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-2	P-1	Storage	0.24	0.24	0.1247774	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-24	P-1	Abrasive Blasting	0	0	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-25	P-1	OD Coater	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6256	-122.7294
26-1865	EU-27	P-1	Pipe Mill Building Fugitives	0.164	0.164	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.6256	-122.7294
26-1865	EU-3	P-1	Scrap Piles	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6256	-122.7294
26-1865	EU-8	P-1	Surface processing	0.072	0	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6256	-122.7294
26-1869	BLAST	P-1	BLASTING	0.052	0.052	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	BLAST	P-2	BLASTING	0.00504	0.00504	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	BLAST	P-3	BLASTING	0.00205	0.00205	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	BURN/ARC	P-1	BURN/ARC	0.025	0.025	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	BURN/ARC	P-2	BURN/ARC	0.0037	0.0037	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	BURN/WELD	P-1	MAIN FOUNDRY BURN/WELD, CC	0.021	0.021	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	PATTERN	P-1	Pattern Shop, CDW8*	0.00000918	0.00000918	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	RODFENTS	P-1	Fugitives	4.54	4.54	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5996	-122.7291
26-1869	RODFENTS	P-2	Fugitives	18.8	18.8	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5996	-122.7291
26-1869	ROTOBLAST	P-1	ROTOBLAST 1 & 2, CDW7 & CDW24	0.06	0.06	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDCORE	P-1	CORE ROOM, CDW*	0.011	0.011	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDMAN	P-1	Sand preparation	0.198	0.198	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDMAN	P-2	Sand preparation	0.204	0.204	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDMAN	P-3	Sand preparation	0.054	0.054	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDMILL2	P-1	MILL 2 GROUP 8, CDW*	0.00459	0.00459	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDMILL	P-1	MILL GROUP 3&6, CDW*	0.059	0.059	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDMILL	P-2	Sand reclamation	0.151	0.151	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDRECL	P-1	Sand reclamation	0.067	0.067	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDRECL	P-2	Sand reclamation	0.023	0.023	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1869	SANDRECL	P-3	Sand reclamation	0	0	0	RP-GS	Default parameters for release	40	5	72	40	47123.88	45.5996	-122.7291
26-1885	GALVANIZING	P-1	GALVANIZING KETTLES	0.581	0.581	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5394	-122.7122
26-1889	UREA HANDLG	P-1	UREA HANDLING	0.098	0.00558	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6248	-122.7852
26-1891	PRODUCTION	P-2	Production	1.59	0.812	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6229	-122.7838
26-1891	RECEIVED	P-1	Receiving	13.5	4.9	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6229	-122.7838
26-1891	RECEIVED	P-2	Receiving	0.023	0.023	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.6229	-122.7838
26-2003	CLEANING	P-1	GRAIN CLEANING	0.074	0.013	0	RP-GS	Default parameters for release	40	5	72	40	47100	45.5362	-122.6751
26-2003	HEAD HOUSE	P-1	HEAD HOUSE	0.135	0.023	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2003	HEAD HOUSE	P-2	HEAD HOUSE	0.135	0.023	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2003	LOADOUT	P-1	LOADOUT	0.47	0.086	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2003	REC BRG	P-1	BARGE RECEIVING	0.133	0.018	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2003	REC RC	P-1	RAIL CAR RECEIVING	0.00163	0.00027	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2003	REC TK	P-1	TRUCK RECEIVING	0.00205	0.00041	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2003	SUNDRY	P-1	CLEANING AREA TRUCK LOADOUT	0.407	0.033	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.5362	-122.6751
26-2043	BACKING APP	P-1	BACKING APPLICATION	0.000074	0.000074	0	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.568	-122.743
26-2043	DRY LOOPER	P-1	MAT DRY LOOPER	0.00779	0.00779	0	RP-FS	Default parameters for release	20	50					

34-2756	EU-02	P-1	Woodwaste Loadout	0.867	0.867	RP-GS	Default parameters for release	60	8	300	37	111600	45.5247	-123.0809
34-2756	IA	P-1	Insignificant Activities	1	1	RP-FS	Default parameters for release	60	8	300	37	111600	45.5247	-123.0809
34-2783	SLO	P-1	FLOUR SLO	0.494	0.494	RP-FS	Default parameters for release	20	50	72	7	824667.9	45.4831	-122.7874
34-9507	EG1	P-1	EMERGENCY GEN 1	0.00218	0.00218	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5572	-122.9262
34-9507	EG2	P-1	EMERGENCY GEN 2	0.00426	0.00426	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5572	-122.9262
34-9507	FWP	P-1	FIRE WATER PUMP	0.00236	0.00236	RP-GSF	Default parameters for release	60	8	300	37	111600	45.5572	-122.9262



# Attachment D

## Regional Soils and Vegetation Data





















# CDL2022 CDL, Washington County, Oregon









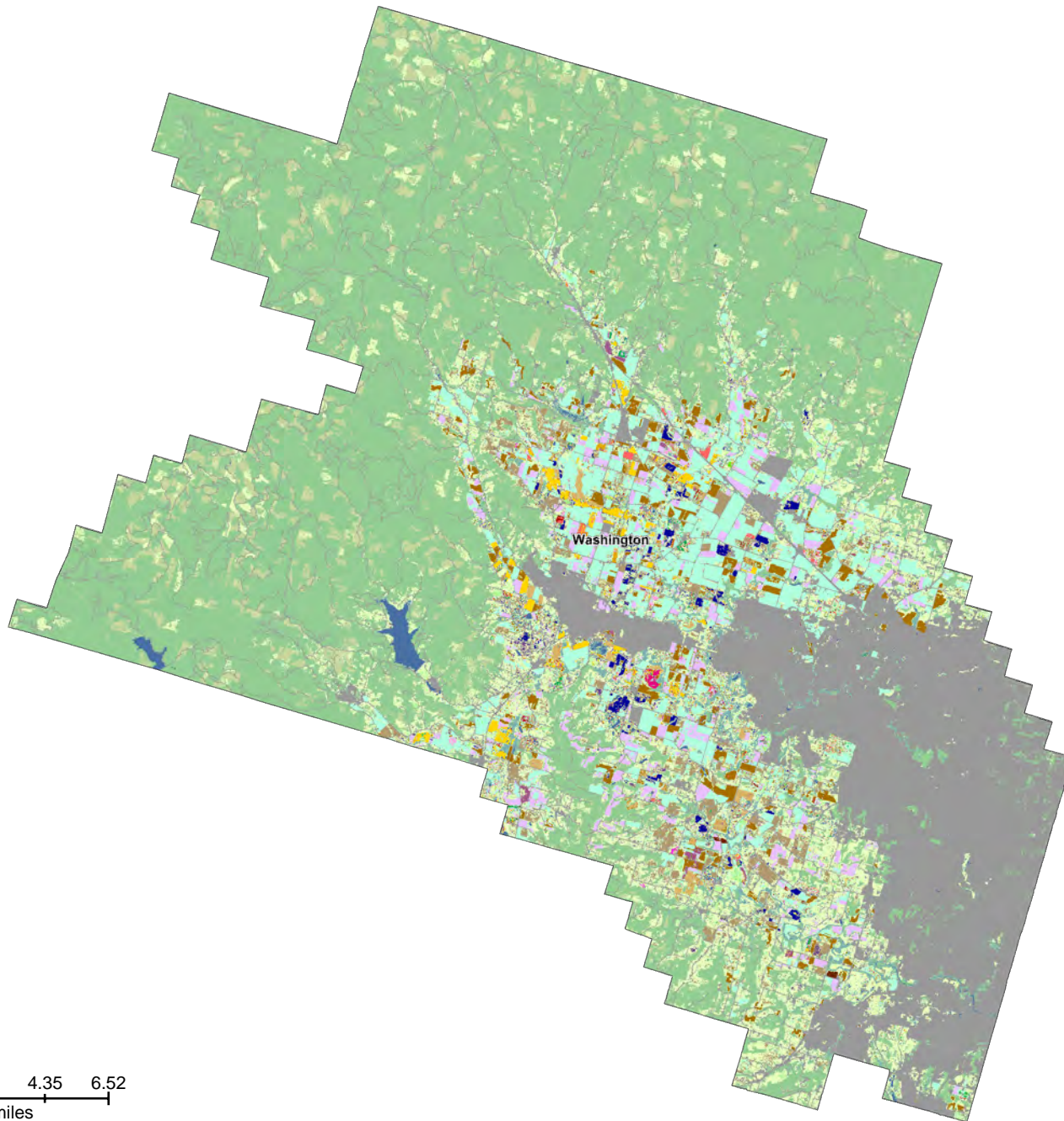
Land Cover Categories  
(by decreasing acreage)

### AGRICULTURE\*

-  Grass/Pasture
-  Sod/Grass Seed
-  Clover/Wildflowers
-  Other Tree Crops
-  Winter Wheat
-  Other Hay/Non Alfalfa
-  Corn
-  Blueberries
-  Spring Wheat
-  Oats
-  Grapes
-  Hops
-  Dry Beans
-  Fallow/Idle Cropland
-  Alfalfa
-  Barley

### NON-AGRICULTURE\*\*

-  Evergreen Forest
-  Mixed Forest
-  Developed/Low Intensity
-  Developed/Medium Intensity
-  Shrubland
-  Developed/Open Space



0 2.17 4.35 6.52  
miles

**Washington County Commercial Crop Data**

Value	Category	Count	Acreage
1	Corn	49554	11020.5
4	Sorghum	297	66.1
6	Sunflowers	10	2.2
12	Sweet Corn	4528	1007
14	Mint	1801	400.5
21	Barley	2134	474.6
23	Spring Wheat	19457	4327.1
24	Winter Wheat	60858	13534.5
27	Rye	14	3.1
28	Oats	5501	1223.4
31	Canola	102	22.7
34	Rape Seed	98	21.8
35	Mustard	5	1.1
36	Alfalfa	6575	1462.2
37	Other Hay/Non Alfalfa	70294	15633
39	Buckwheat	26	5.8
41	Sugarbeets	1603	356.5
42	Dry Beans	11027	2452.3
43	Potatoes	2308	513.3
44	Other Crops	3300	733.9
47	Misc Veggies & Fruits	103	22.9
49	Onions	605	134.5
50	Cucumbers	274	60.9
53	Peas	1521	338.3
55	Caneberries	2721	605.1
56	Hops	29541	6569.8
57	Herbs	833	185.3
58	Clover/Wildflowers	77847	17312.8
59	Sod/Grass Seed	512642	114008.8
61	Fallow/Idle Cropland	6398	1422.9
66	Cherries	3104	690.3
67	Peaches	115	25.6
68	Apples	80	17.8
69	Grapes	10894	2422.8
70	Christmas Trees	8359	1859
71	Other Tree Crops	248848	55342.5
76	Walnuts	1603	356.5
77	Pears	129	28.7
111	Open Water	234665	52188.2
121	Developed/Open Space	592579	131786.4
122	Developed/Low Intensity	730090	162368.1
123	Developed/Medium Intensity	607654	135139
124	Developed/High Intensity	242747	53985.6
131	Barren	6411	1425.8
141	Deciduous Forest	142064	31594.3

142	Evergreen Forest	3013886	670272.1
143	Mixed Forest	850605	189170
152	Shrubland	445984	99184.5
176	Grass/Pasture	1562063	347394.4
190	Woody Wetlands	165824	36878.4
195	Herbaceous Wetlands	169802	37763.1
205	Triticale	724	161
206	Carrots	5	1.1
208	Garlic	1167	259.5
214	Broccoli	829	184.4
219	Greens	931	207
220	Plums	188	41.8
221	Strawberries	1990	442.6
222	Squash	5533	1230.5
224	Vetch	1388	308.7
227	Lettuce	5	1.1
228	Dbl Crop Triticale/Corn	49	10.9
229	Pumpkins	1272	282.9
242	Blueberries	18108	4027.1
243	Cabbage	413	91.8
244	Cauliflower	3023	672.3
246	Radishes	4098	911.4
247	Turnips	903	200.8
250	Cranberries	1	0.2



















# CDL2022 CDL, Multnomah County, Oregon









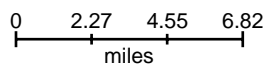
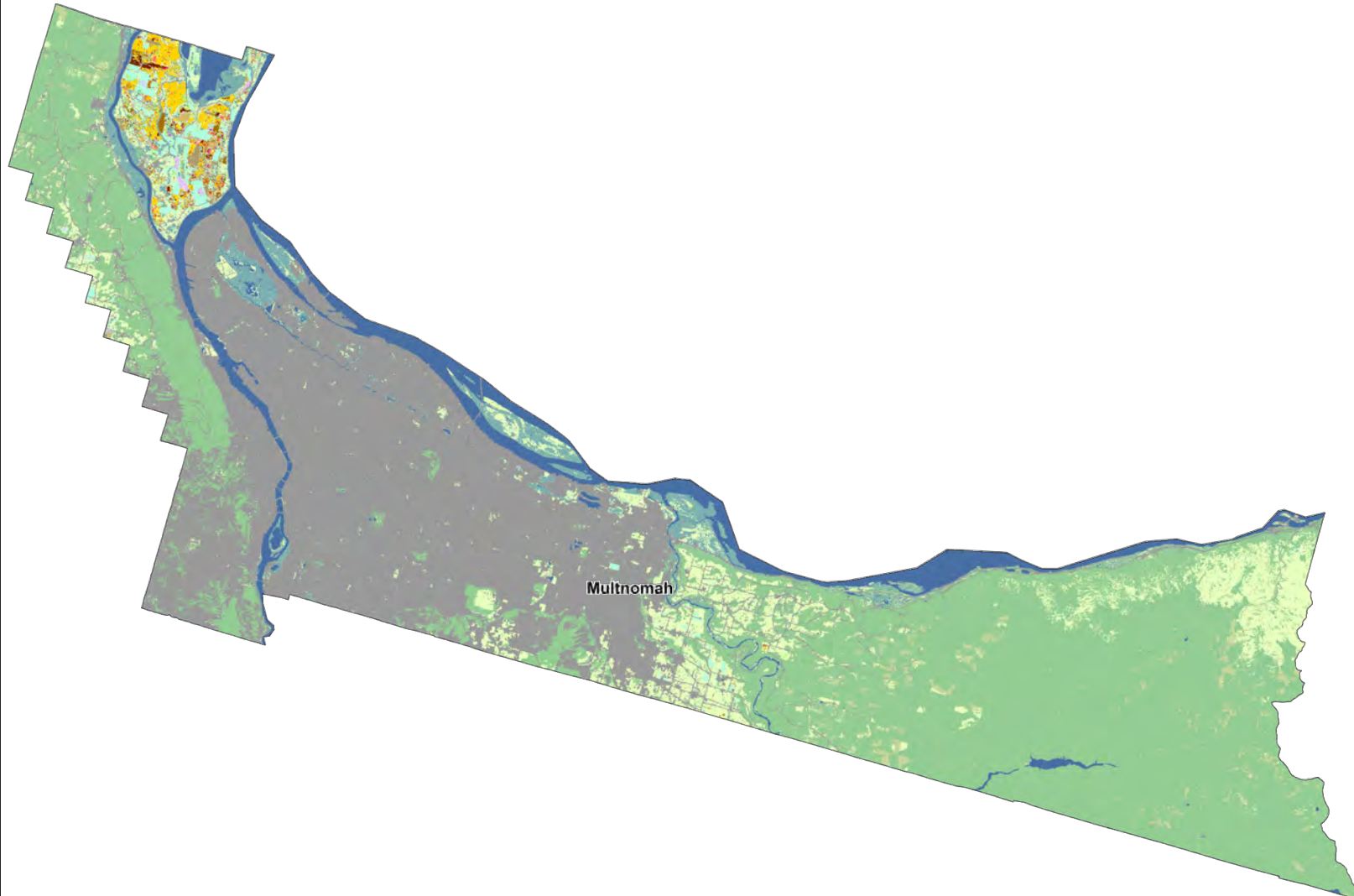
Land Cover Categories  
(by decreasing acreage)

### AGRICULTURE\*

-  Grass/Pasture
-  Sod/Grass Seed
-  Corn
-  Other Tree Crops
-  Other Hay/Non Alfalfa
-  Clover/Wildflowers
-  Winter Wheat
-  Potatoes
-  Spring Wheat
-  Fallow/Idle Cropland
-  Sweet Corn
-  Squash
-  Dry Beans
-  Alfalfa
-  Hops
-  Oats

### NON-AGRICULTURE\*\*

-  Evergreen Forest
-  Developed/Medium Intensity
-  Developed/Low Intensity
-  Developed/High Intensity
-  Mixed Forest
-  Open Water



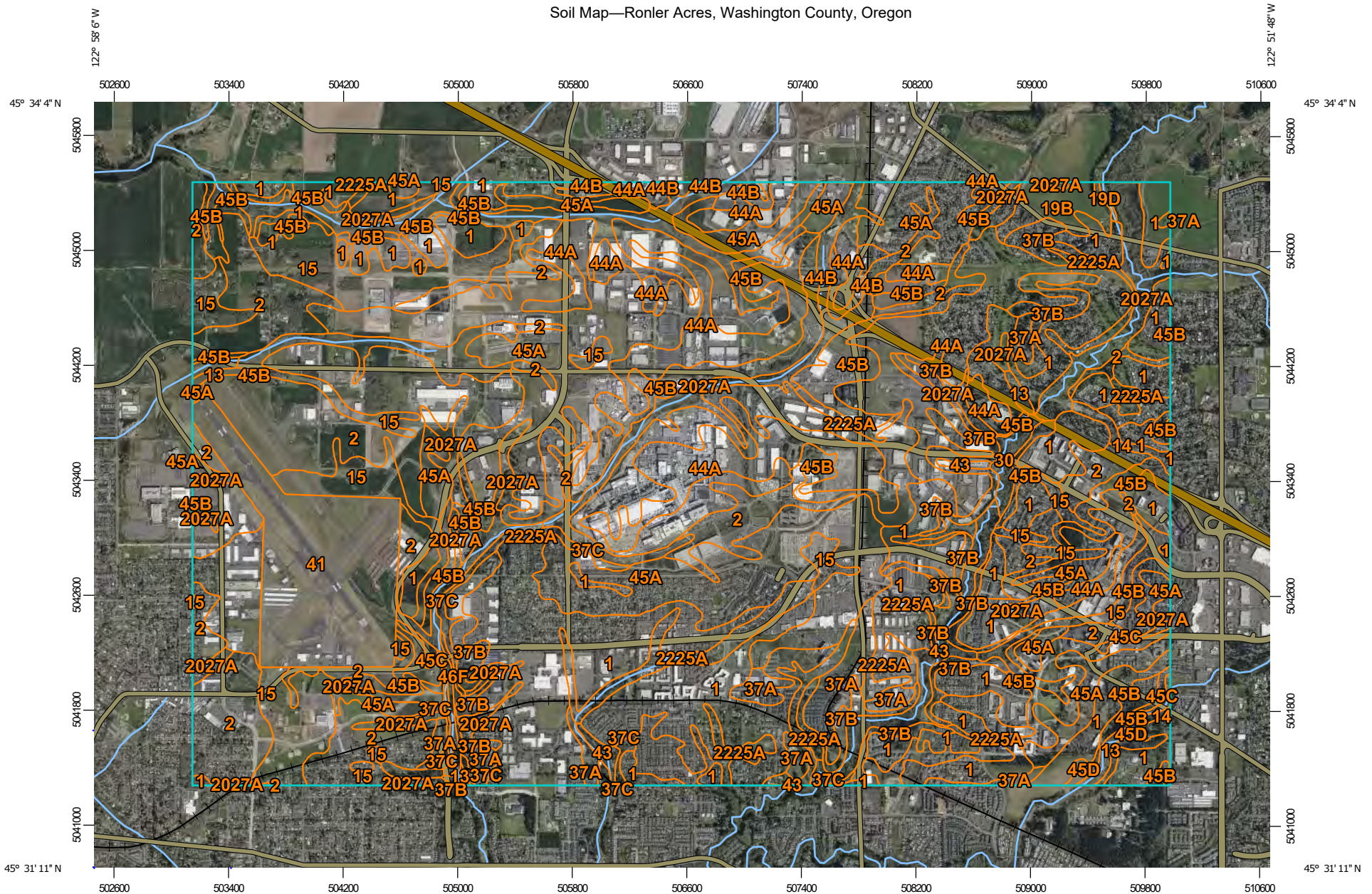


**Multnomah County Commercial Crop Data**

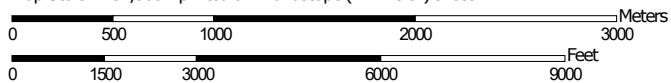
Value	Category	Count	Acreage
1	Corn	9875	2196.1
4	Sorghum	16	3.6
12	Sweet Corn	781	173.7
14	Mint	131	29.1
21	Barley	83	18.5
23	Spring Wheat	1157	257.3
24	Winter Wheat	1641	364.9
28	Oats	242	53.8
34	Rape Seed	5	1.1
36	Alfalfa	446	99.2
37	Other Hay/Non Alfalfa	2034	452.4
39	Buckwheat	4	0.9
41	Sugarbeets	90	20
42	Dry Beans	674	149.9
43	Potatoes	1299	288.9
44	Other Crops	224	49.8
47	Misc Veggies & Fruits	5	1.1
49	Onions	2	0.4
50	Cucumbers	94	20.9
53	Peas	159	35.4
56	Hops	374	83.2
57	Herbs	104	23.1
58	Clover/Wildflowers	2001	445
59	Sod/Grass Seed	13369	2973.2
61	Fallow/Idle Cropland	943	209.7
66	Cherries	79	17.6
67	Peaches	10	2.2
68	Apples	2	0.4
69	Grapes	196	43.6
70	Christmas Trees	57	12.7
71	Other Tree Crops	4376	973.2
76	Walnuts	15	3.3
77	Pears	14	3.1
111	Open Water	87600	19481.8
121	Developed/Open Space	57737	12840.4
122	Developed/Low Intensity	125231	27850.7
123	Developed/Medium Intensity	175992	39139.7
124	Developed/High Intensity	94747	21071.2
131	Barren	940	209.1
141	Deciduous Forest	13630	3031.2
142	Evergreen Forest	459848	102267.7
143	Mixed Forest	89109	19817.4
152	Shrubland	28677	6377.6
176	Grass/Pasture	113900	25330.8
190	Woody Wetlands	18360	4083.2
195	Herbaceous Wetlands	31615	7031
205	Triticale	7	1.6
206	Carrots	5	1.1
208	Garlic	22	4.9
214	Broccoli	80	17.8
219	Greens	15	3.3
220	Plums	1	0.2
221	Strawberries	148	32.9
222	Squash	711	158.1
224	Vetch	60	13.3
228	Dbl Crop Triticale/Corn	3	0.7

229	Pumpkins	101	22.5
242	Blueberries	149	33.1
243	Cabbage	105	23.4
244	Cauliflower	122	27.1
246	Radishes	151	33.6
247	Turnips	71	15.8

Soil Map—Ronler Acres, Washington County, Oregon



Map Scale: 1:37,500 if printed on A landscape (11" x 8.5") sheet.



Map projection: Web Mercator Corner coordinates: WGS84 Edge tics: UTM Zone 10N WGS84

## MAP LEGEND

### Area of Interest (AOI)

 Area of Interest (AOI)

### Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

### Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

### Water Features



Streams and Canals

### Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

### Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Washington County, Oregon

Survey Area Data: Version 22, Sep 14, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

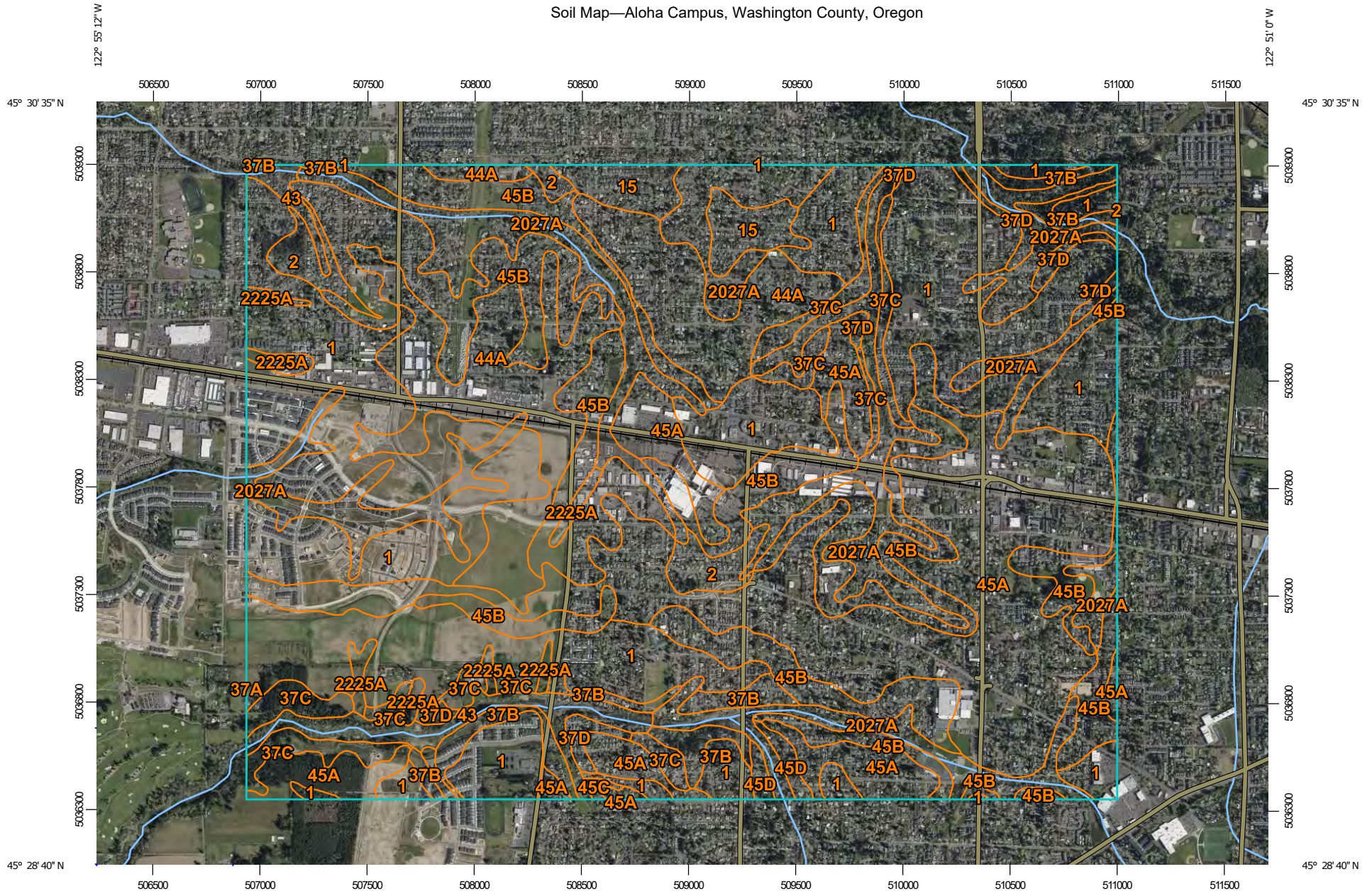
Date(s) aerial images were photographed: Apr 16, 2021—Apr 18, 2021

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

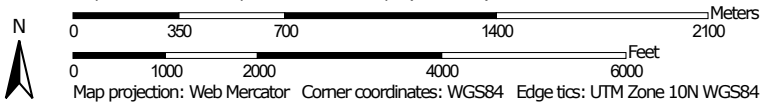
## Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
1	Aloha silt loam	1,353.7	19.0%
2	Amity silt loam	937.6	13.2%
13	Cove silty clay loam	61.9	0.9%
14	Cove clay	16.5	0.2%
15	Dayton silt loam	540.3	7.6%
19B	Helvetia silt loam, 2 to 7 percent slopes	47.1	0.7%
19D	Helvetia silt loam, 12 to 20 percent slopes	2.5	0.0%
30	McBee silty clay loam	21.4	0.3%
37A	Quatama loam, 0 to 3 percent slopes	126.4	1.8%
37B	Quatama loam, 3 to 7 percent slopes	232.7	3.3%
37C	Quatama loam, 7 to 12 percent slopes	38.6	0.5%
37D	Quatama loam, 12 to 20 percent slopes	6.4	0.1%
41	Urban land	325.1	4.6%
43	Wapato silty clay loam	96.9	1.4%
44A	Willamette silt loam, 0 to 3 percent slopes	626.2	8.8%
44B	Willamette silt loam, 3 to 7 percent slopes	63.3	0.9%
45A	Woodburn silt loam, 0 to 3 percent slopes	1,012.5	14.2%
45B	Woodburn silt loam, 3 to 7 percent slopes	821.0	11.5%
45C	Woodburn silt loam, 7 to 12 percent slopes	34.2	0.5%
45D	Woodburn silt loam, 12 to 20 percent slopes	15.4	0.2%
46F	Xerochrepts and Haploxerolls, very steep	10.7	0.2%
2027A	Verboort silty clay loam, 0 to 3 percent slopes	466.8	6.6%
2225A	Huberly silt loam, 0 to 3 percent slopes	254.5	3.6%
<b>Totals for Area of Interest</b>		<b>7,113.0</b>	<b>100.0%</b>

Soil Map—Aloha Campus, Washington County, Oregon



Map Scale: 1:25,000 if printed on A landscape (11" x 8.5") sheet.




## MAP LEGEND

### Area of Interest (AOI)

 Area of Interest (AOI)

### Soils

 Soil Map Unit Polygons

 Soil Map Unit Lines

 Soil Map Unit Points

### Special Point Features



Blowout



Borrow Pit



Clay Spot



Closed Depression



Gravel Pit



Gravelly Spot



Landfill



Lava Flow



Marsh or swamp



Mine or Quarry



Miscellaneous Water



Perennial Water



Rock Outcrop



Saline Spot



Sandy Spot



Severely Eroded Spot



Sinkhole



Slide or Slip



Sodic Spot



Spoil Area



Stony Spot



Very Stony Spot



Wet Spot



Other



Special Line Features

### Water Features



Streams and Canals

### Transportation



Rails



Interstate Highways



US Routes



Major Roads



Local Roads

### Background



Aerial Photography

## MAP INFORMATION

The soil surveys that comprise your AOI were mapped at 1:20,000.

Please rely on the bar scale on each map sheet for map measurements.

Source of Map: Natural Resources Conservation Service

Web Soil Survey URL:

Coordinate System: Web Mercator (EPSG:3857)

Maps from the Web Soil Survey are based on the Web Mercator projection, which preserves direction and shape but distorts distance and area. A projection that preserves area, such as the Albers equal-area conic projection, should be used if more accurate calculations of distance or area are required.

This product is generated from the USDA-NRCS certified data as of the version date(s) listed below.

Soil Survey Area: Washington County, Oregon

Survey Area Data: Version 22, Sep 14, 2022

Soil map units are labeled (as space allows) for map scales 1:50,000 or larger.

Date(s) aerial images were photographed: Apr 16, 2021—Apr 18, 2021

The orthophoto or other base map on which the soil lines were compiled and digitized probably differs from the background imagery displayed on these maps. As a result, some minor shifting of map unit boundaries may be evident.

## Map Unit Legend

Map Unit Symbol	Map Unit Name	Acres in AOI	Percent of AOI
1	Aloha silt loam	831.1	27.9%
2	Amity silt loam	44.0	1.5%
15	Dayton silt loam	51.7	1.7%
37A	Quatama loam, 0 to 3 percent slopes	0.0	0.0%
37B	Quatama loam, 3 to 7 percent slopes	69.0	2.3%
37C	Quatama loam, 7 to 12 percent slopes	93.5	3.1%
37D	Quatama loam, 12 to 20 percent slopes	30.0	1.0%
43	Wapato silty clay loam	60.6	2.0%
44A	Willamette silt loam, 0 to 3 percent slopes	277.1	9.3%
45A	Woodburn silt loam, 0 to 3 percent slopes	591.8	19.9%
45B	Woodburn silt loam, 3 to 7 percent slopes	483.0	16.2%
45C	Woodburn silt loam, 7 to 12 percent slopes	2.2	0.1%
45D	Woodburn silt loam, 12 to 20 percent slopes	11.7	0.4%
2027A	Verboort silty clay loam, 0 to 3 percent slopes	396.9	13.3%
2225A	Huberly silt loam, 0 to 3 percent slopes	31.4	1.1%
<b>Totals for Area of Interest</b>		<b>2,974.0</b>	<b>100.0%</b>