

NW Metals Inc.
Air Quality Permit
and Cleaner Air Oregon
December 12 and 15, 2020



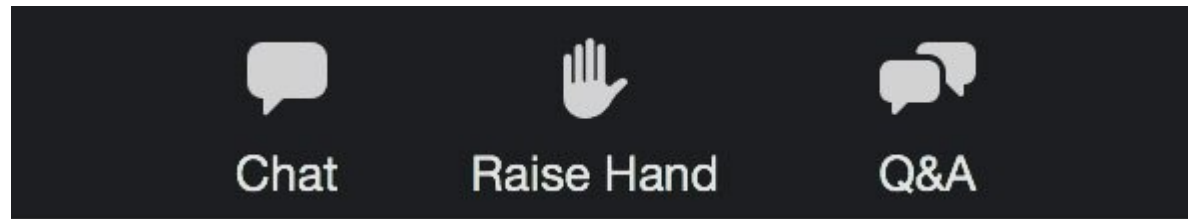
State of Oregon
Department of Environmental Quality

Using Zoom Webinar

- Hear the audio either through your computer or by calling in by phone with the phone number provided upon registration.
- Note that you will not be able to speak unless the host enables your audio and then you unmute.

Asking a Question

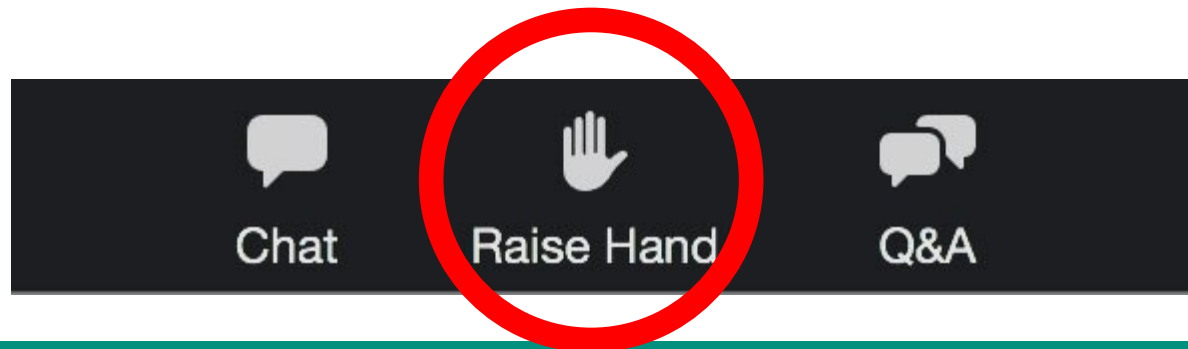
- You should see the following along the bottom of your screen.



- To ask a question: type it into the Q&A or raise your hand and the host will un-mute you. (*9 if you're on the phone)
- Use chat if you're having technical difficulties.

Making a Comment

- During the public hearing portion of the meeting, raise your hand to comment
- We'll call folks in the order their hand was raised
- Remember *9 if you're listening by phone
- State and spell your first and last name



NW Metals Inc.

Introduction

Nina DeConcini, DEQ Northwest Region Administrator,
David Graiver, DEQ Permit Writer

Staff

- Steve Dietrich, DEQ Air Quality Manager
- Nina DeConcini, DEQ Northwest Region Administrator
- David Graiver, DEQ Permit Writer
- JR Giska, DEQ Cleaner Air Oregon Program Engineer
- Lauren Wirtis, DEQ Northwest Region Communications
- David Farrer, Oregon Health Authority Toxicologist

Guidelines for the Meeting

- Be respectful of each other and to DEQ representatives.
- We will make every attempt to respond to all questions, but will allow people who have not had a turn to pose one question before others ask additional questions.
- Speak for yourself.

Agenda

- **NW Metals Activities**
 - What do they do?
- **Regulated Pollutants**
 - What are the emissions?
- **Cleaner Air Oregon**
 - What is the health risk?
- **Permit Requirements**
 - How will DEQ regulate NW Metals?
- **Q & A**

NW Metals Permitting Process

- Cleaner Air Oregon Process
- Air Permit Application
- Public Notice

Public Hearing

- Public Comments Due by 01/08/2021 at 5 PM
- Public Comments Review and Response
- DEQ Permit Decision

NW Metals Inc.

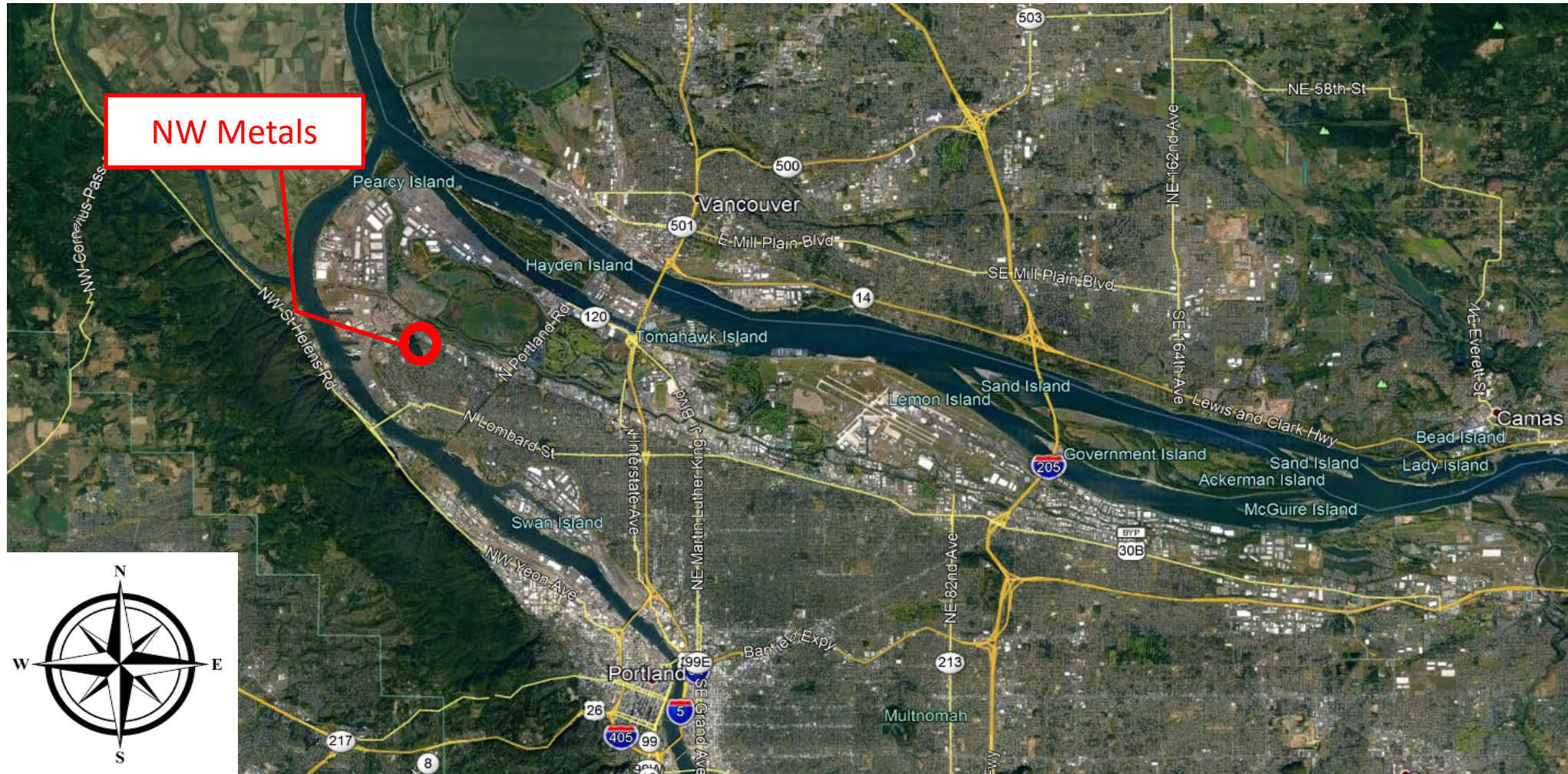
Activities: What do they do?

David Graiver, DEQ Permit Writer



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NW Metals Inc. - 9537 N Columbia Blvd



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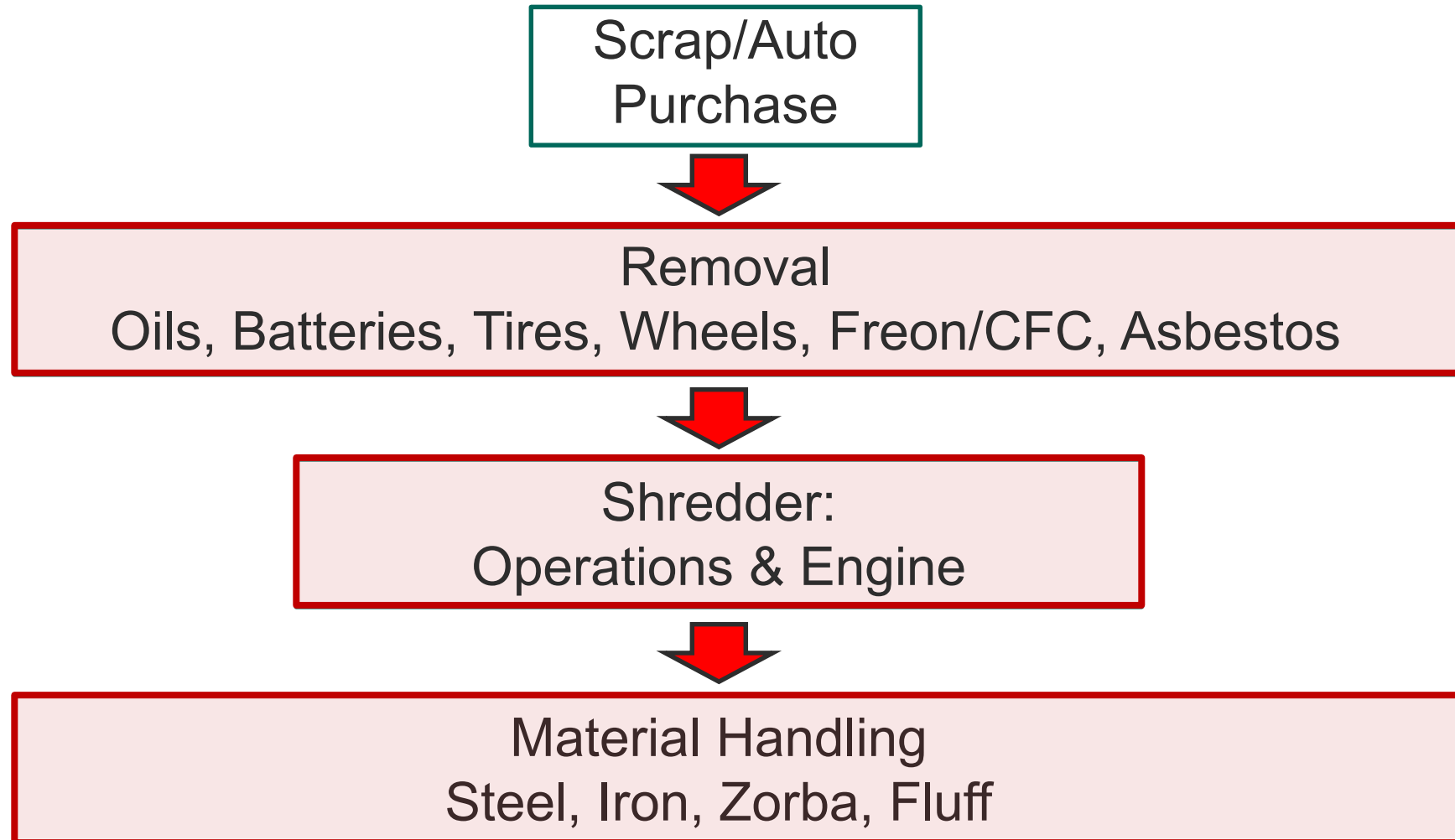


What does NW Metals do?

- Auto salvage processing and recycling facility
- Final Products:
 - Iron
 - Steel
 - Zorba
 - Fluff



Simplified Process Flow



NW Metals Inc.

Regulated Pollutants: What are the emissions?

David Graiver, DEQ Permit Writer



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How Air Emissions are Regulated

Environmental Protection Agency

Oregon Department of Environmental Quality



Criteria
Pollutants

Limit emissions of
Particulate Matter (PM) and
other Air Pollutants

Plant Site Emission
Limits
[tons/yr]

Air Contaminant
Discharge
Permits



Hazardous
Air
Pollutants

Limit Emissions of 187 HAPS,
such as Benzene and
Formaldehyde

Cleaner Air Oregon
Health-risk based

Where do the emissions come from?

Process	PM	NO _x	SO _x	CO	VOC	HAPs/ TACs*	GHGs
Fluid Draining					X	X	X
Shredder Engine	X	X	X	X	X	X	X
Shredding	X				X	X	
Material Handling	X					X	

* - Toxic Air Contaminants (TACs) are regulated by the Cleaner Air Oregon Program

What are the emissions and limits?

Pollutant	Potential to Emit (tons/year)	Proposed Limits (tons/year)
Total Particulate Matter	0.94	24
Coarse Particulate Matter	0.52	-
Fine Particulate Matter	0.20	-
Nitrogen Oxides	0.53	-
Sulfur Oxides	0.01	-
Carbon Monoxide	4.67	99
Volatile Organic Compounds	4.43	39
Individual HAP (Toluene)	0.10	-
Combined HAPs	0.43	-
Greenhouse Gases	846	-

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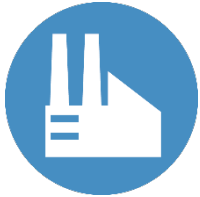
Cleaner Air Oregon: What is the health risk?

JR Giska, DEQ Cleaner Air Oregon Program Engineer



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Cleaner Air Oregon



Report air toxics

Companies to report use of 600 pollutants to state regulators



Assess risk

Facilities calculate potential health risks to people who live, work, and go to school nearby



Regulate to reduce risk

Companies would have to act if the levels of air toxics they emit exceed health risk action levels (RALs)

CAO Program Scope

- ❑ Cumulative, facility-wide risk assessment



CAO Program Scope

□ Health risks evaluated:

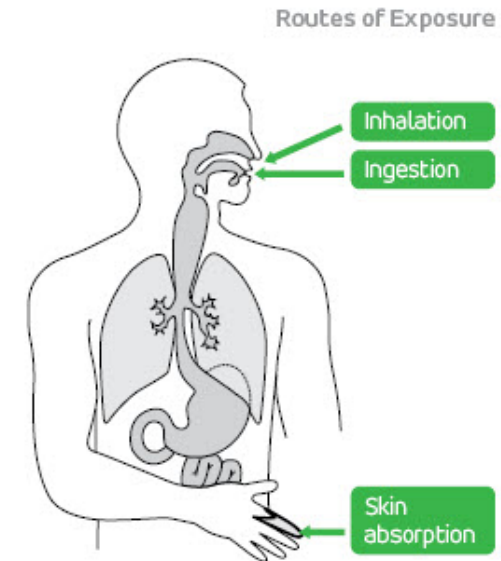
- ❖ Cancer (annual)
- ❖ Noncancer - acute (24 hour) and chronic (annual)
- ❖ Multipathway exposure for persistent and bioaccumulative chemicals



Chronic Exposure
Long period of time

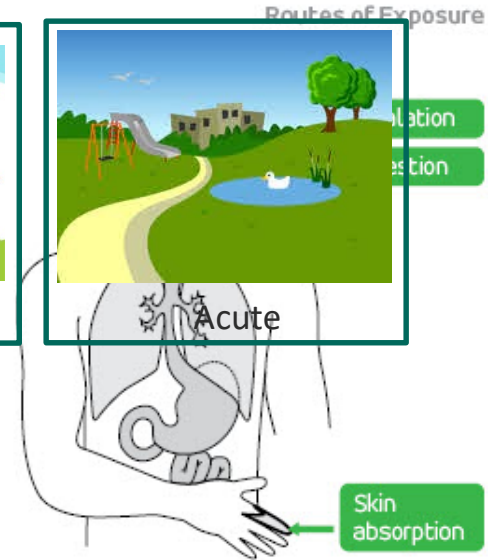


Acute Exposure
Short period of time



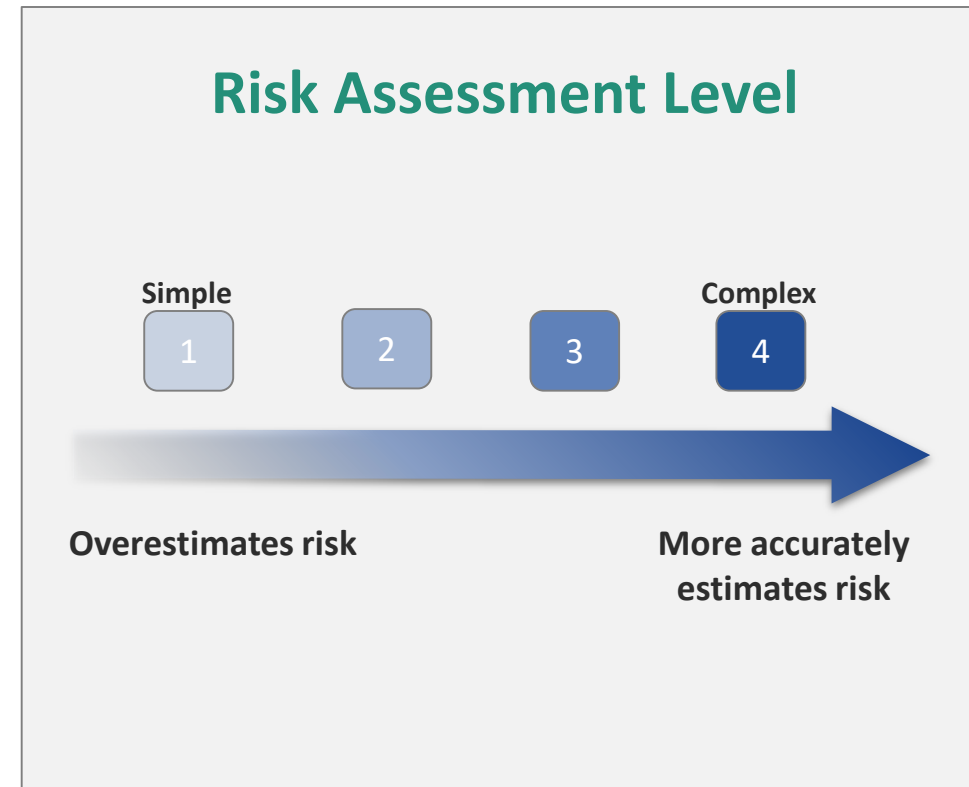
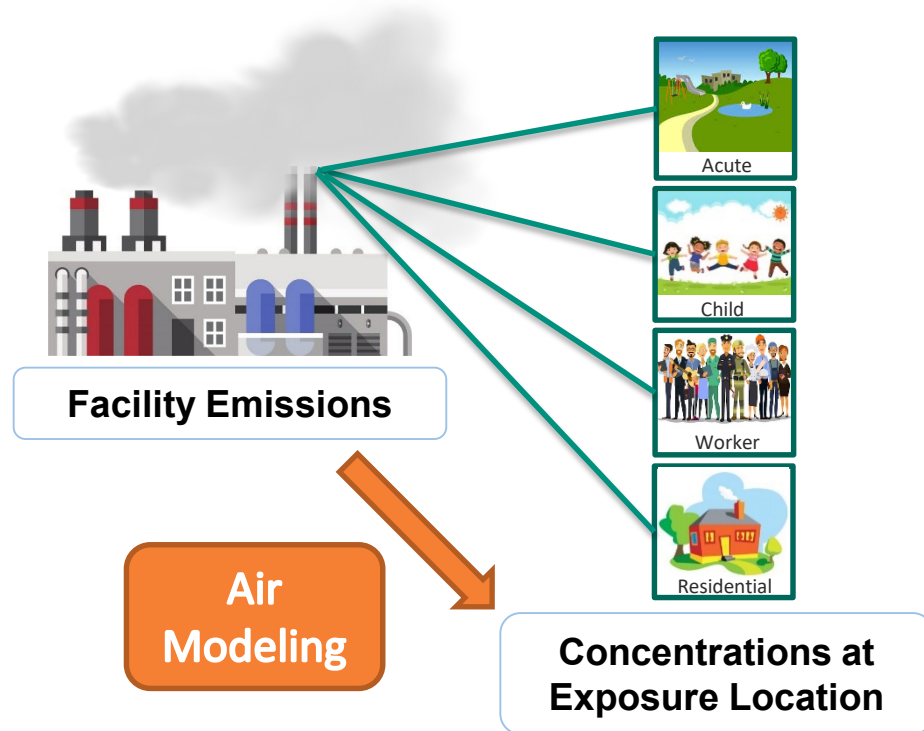
CAO Program Scope

- ☐ Exposure locations considered – based on zoning:
 - ❖ Residential
 - ❖ Non-residential adult and/or child
 - ❖ Acute

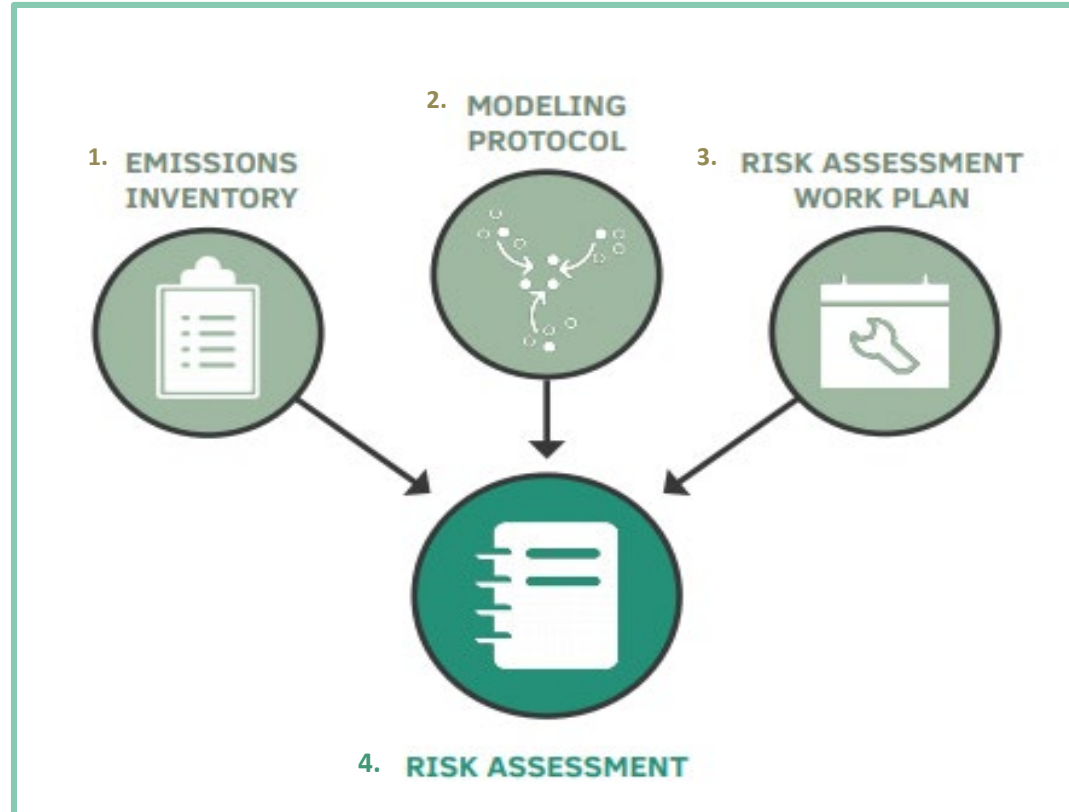


CAO Program Scope

☐ 4 “tiers” of Risk Assessments (simple to complex)



How do we assess risk?

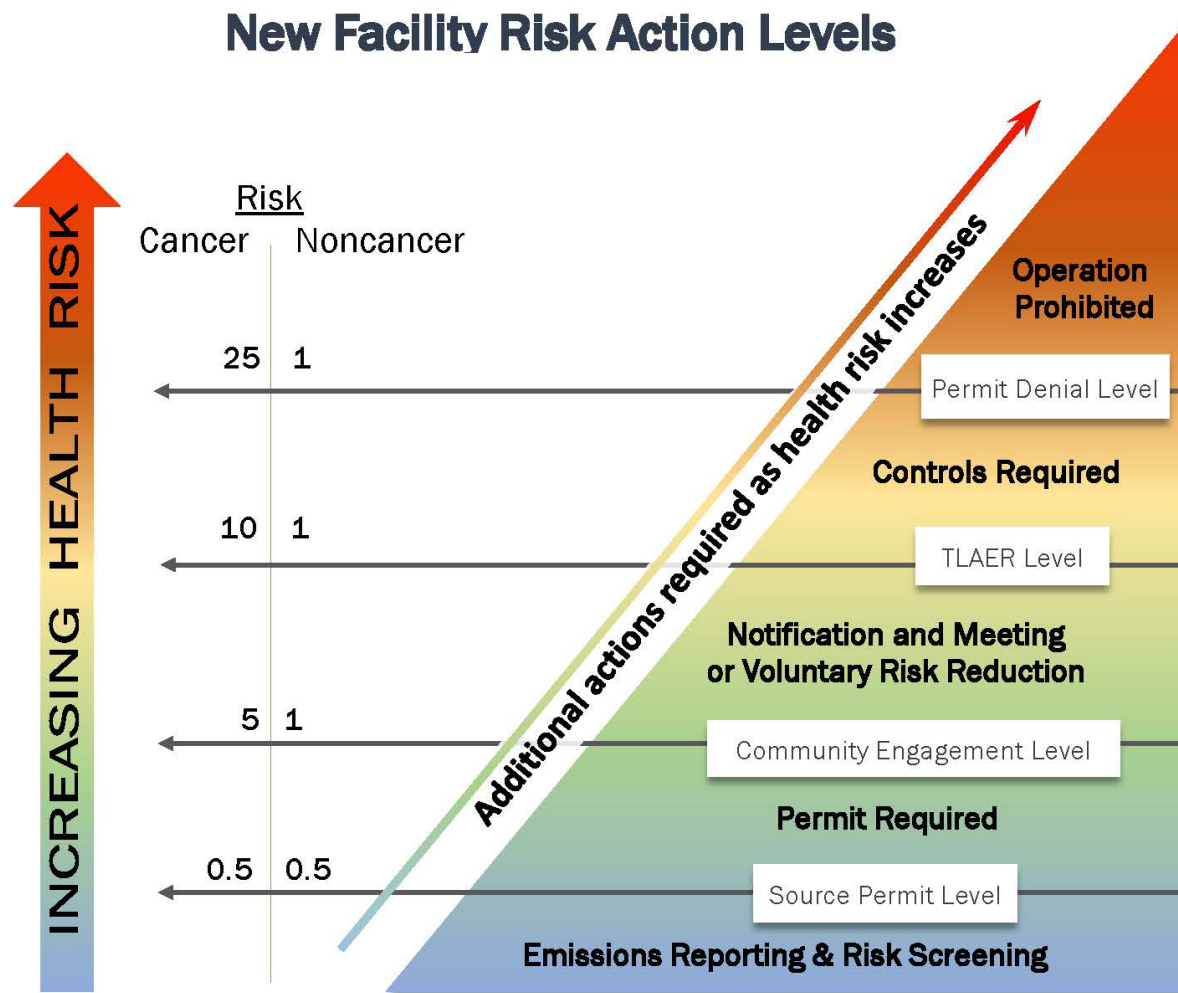


Risk Assessment Technical Submittals

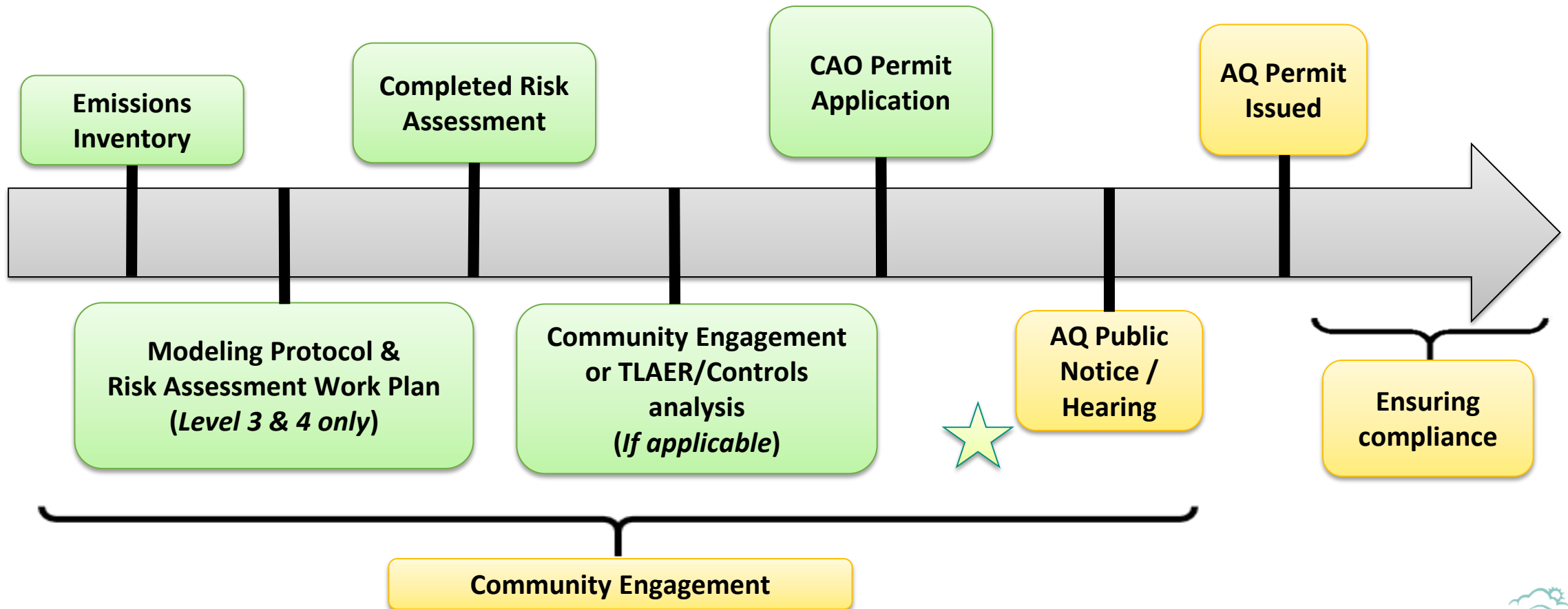
Risk Actions Levels

Cancer Risk is the excess cancer risk over the national background cancer rate of 395,000 per million. (National Cancer Institute)

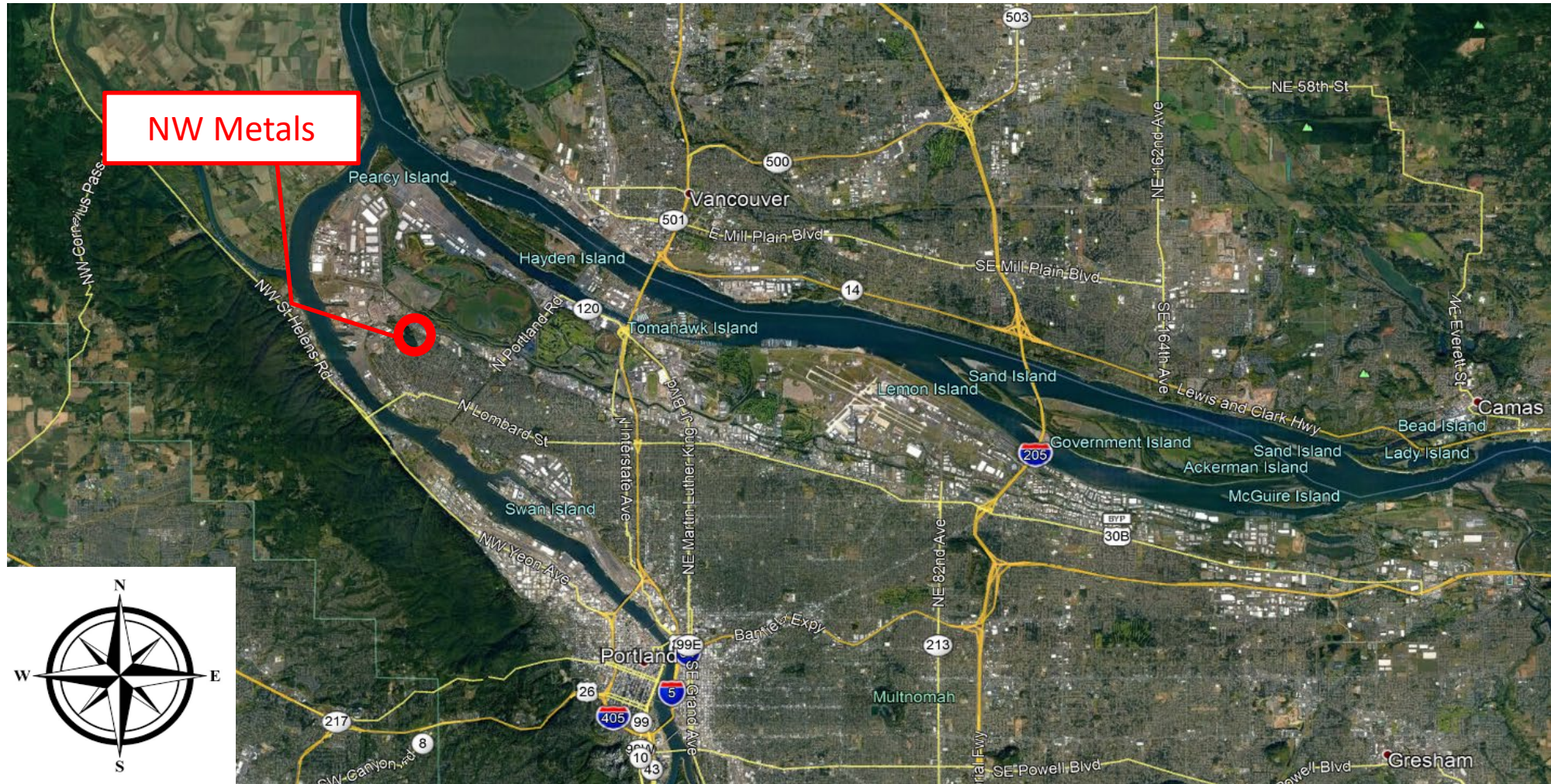
Noncancer Risk is measured as a Hazard Index - adverse health impacts may occur at values >1.



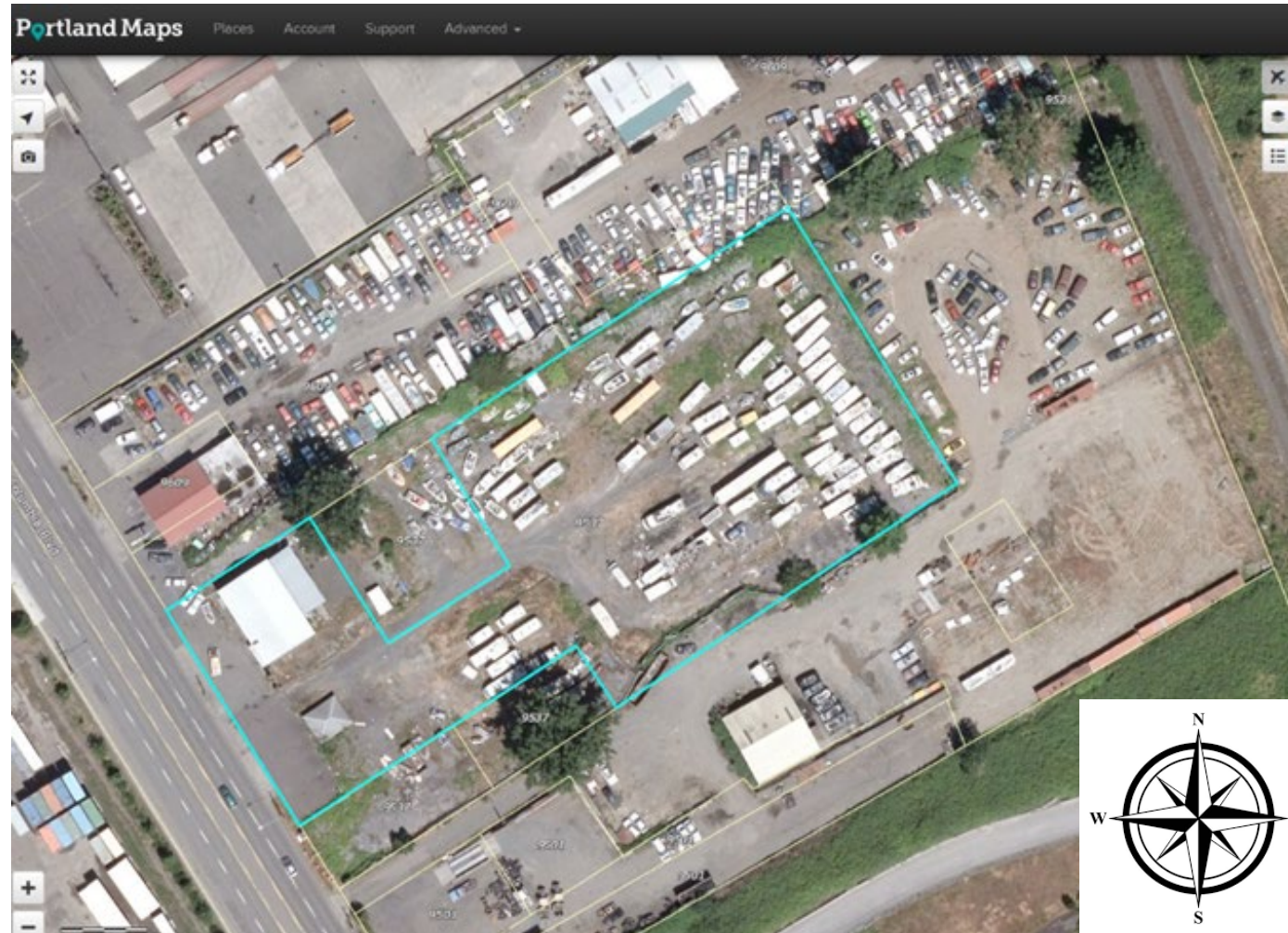
Cleaner Air Oregon Process



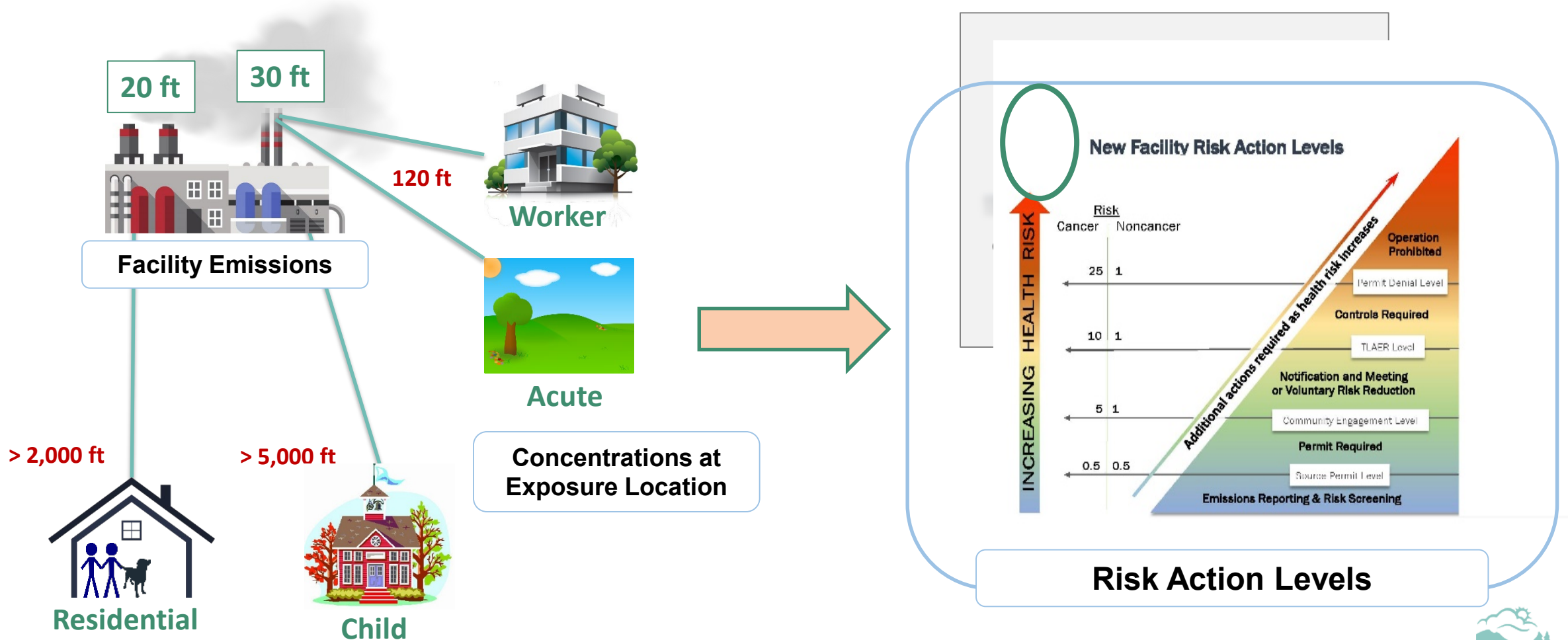
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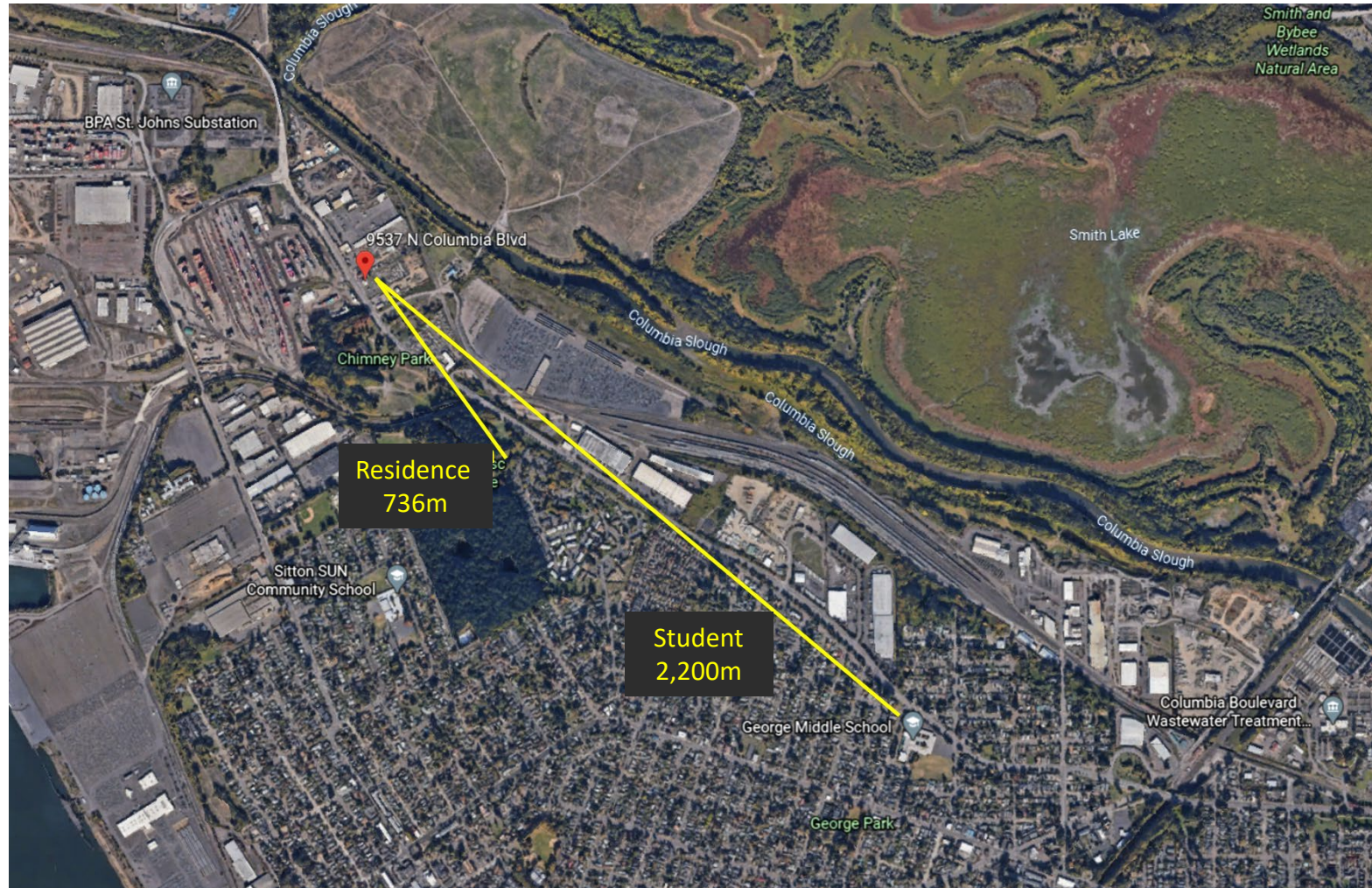
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NW Metals – Level 1 Risk Assessment



Exposure Locations – Residence & School



Exposure Locations – Worker & Acute



NW Metals Risk Assessment - Considerations

Toxics Emissions Units:

- Shredder
- Diesel Engine
- Conveyance Drop

Risk Drivers:

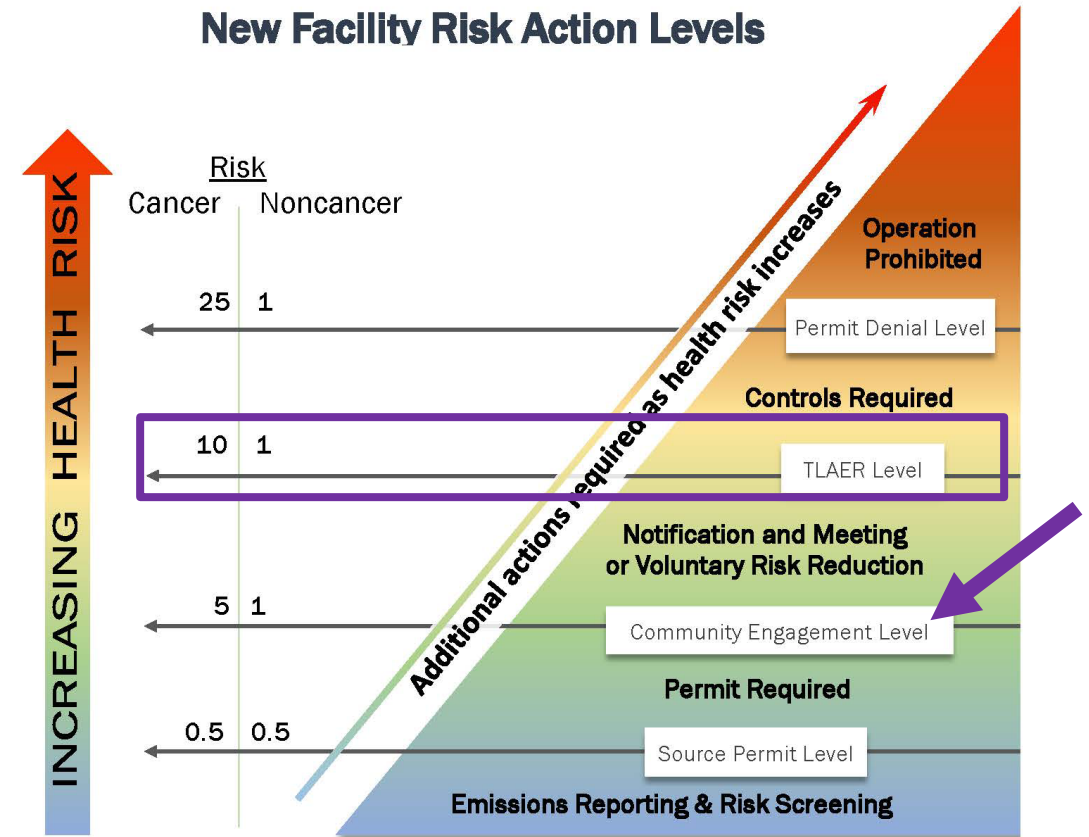
- Proximity to businesses
- Polychlorinated Biphenyls (PCBs), Polycyclic Aromatic Hydrocarbons (PAHs), Hexavalent Chromium [Cr(VI)], Lead



NW Metals Risk Assessment - Results

Risk Results:

- **Cancer:** PCBs, Cr(VI), and PAHs
 - Shredding and diesel emissions
- **Acute noncancer:** Lead
 - Shredding and material handling emissions



NW Metals CAO Permit Conditions

- Limit hours of operation
- Maintain risk below level requiring controls
- Compliance demonstration of shredder capacity

<u>Hours of Operation</u>	
Daily	Annually
8.5	2,350

NW Metals Inc.

Permit Requirements: How will DEQ regulate NW Metals?

David Graiver, DEQ Permit Writer



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Specific Permit Conditions

- List of Regulated Emissions Units
- Requirement to Remove:
 - Fluids
 - Batteries
 - Mercury Switches
 - Lead
 - CFCs
 - Asbestos

Specific Permit Conditions

- CAO Operational Restrictions
 - 8.5 hours per day
 - 2,350 hours per year
- Capacity Determination Test
 - Determine maximum hourly capacity of shredder
- Semi-Annual Compliance Certifications

Other Conditions

- General Emissions Standards
- Operation and Maintenance Requirements
- Plant Site Emission Limits (PSEL)
- Compliance Demonstration Formulas
- Monitoring and Recording Requirements
- Reporting and Notification Requirements

What happens next?

- Public Notice: ordeq.org/publicnotices
 - Comments Due: Jan. 8, 2021
- Submit a comment by:
 - Mail: NWR Air Quality Permit Coordinator
700 NE Multnomah Street Ste 600
Portland, OR 97232
 - Email: nwraqpermits@deq.state.or.us

After the Public Comment Period

- DEQ evaluates all written and oral comments
- After permitting decision, DEQ will publish a Hearings Officer Report and respond to comments received

Potential DEQ Permit Action options:

- Issue permit as proposed,
- Modify permit based on public input and issue the revised permit, or
- Revise permit and request more comments

Information will be made available at <http://ordeq.org/nwmetals>



Questions?

David Graiver, David.Graiver@deq.state.or.us | 503-229-5690

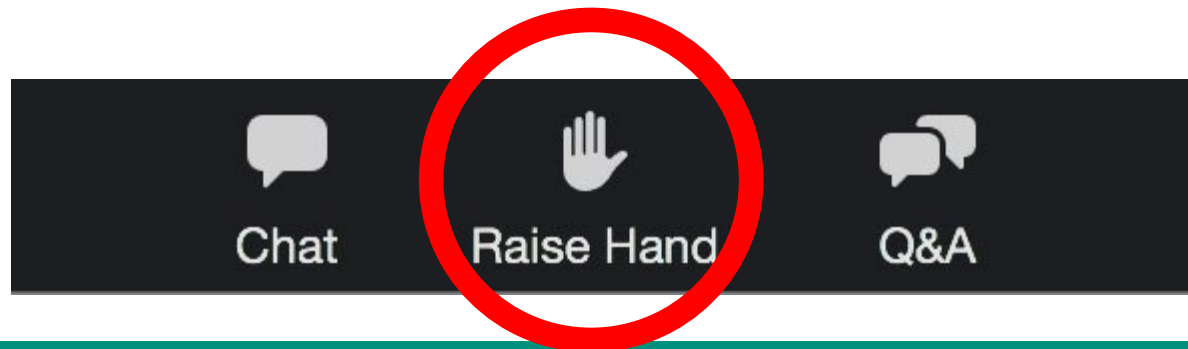
JR Giska, JR.Giska@deq.state.or.us | 503-229-5178



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Public Hearing

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Thank You!



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