

May 27, 2022

Kenzie Billings (Kenzie.BILLINGS@state.or.us)
Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, Oregon 97232

Re: Categorically Exempt Toxics Emissions Units - LPC

Dear Kenzie Billings:

PCC Structural, Inc. (PCC), received a letter dated April 12, 2022 from the Oregon Department of Environmental Quality (DEQ) requesting a review of categorically insignificant activities no longer considered Exempt Toxic Emission Units (TEUs) per the November 2021 revision to the Cleaner Air Oregon (CAO) rules for PCC's Large Parts Campus (LPC). The DEQ has requested revisions to technical documents submitted as part of the CAO process to date to incorporate activities no longer considered Categorically Exempt. Additionally, the DEQ has requested completion of the Categorically Exempt Toxic Emissions Unit AQ523 form.

Potential activities at LPC no longer considered Categorically Exempt are discussed in more detail in the following sections. The DEQ provided a guidance document titled "Cleaner Air Oregon Exempt TEU Reporting" (the guidance) to be used as the basis for this analysis. supporting documentation for this analysis is included as attachments to this letter. Form AQ523 is included as Attachment A.

I. MAINTENANCE AND REPAIR SHOP

LPC operates a small maintenance shop for periodic maintenance and repair of process equipment. Activities include a welding and use of various products such as lubricants, pipe sealants, and parts cleaners.

Product Usage

Review of products used in the maintenance shop identified seven products containing toxic air contaminants (TACs). A conservative annual usage was developed by assuming 1.5 times the average annual purchasing records over the three-year period between 2019 and 2021. Chemical content was determined by review of the product safety data sheets (SDSs).

The usage analysis shows no TACs from product usage in the maintenance shop exceed the reporting thresholds set in Appendix A of the guidance. Product usage threshold calculations and the product SDSs are included in Attachment B and Attachment C, respectively.

Welding

Maintenance engages in various types of welding including shielded metal arc welding (SMAW), gas metal arc welding (GMAW), and gas tungsten arc welding. A conservative annual usage was developed by assuming 1.5 times the average annual purchasing records over the three-year period between 2019 and 2021. A portion of this welding is below thresholds set by the DEQ in Appendix B of the guidance. Welding types exceeding thresholds set by the DEQ are accounted for in the LPC welding TEUs already identified in the facility TAC emissions inventory. As a result, the maintenance shop is an Exempt TEU. Threshold calculations and SDSs for those weld rods below reporting thresholds are included in Attachment B and Attachment C, respectively.

To help with your review of the SDS, we have prepared Table 2 which lists the category, name, and length of each attached documents.

Table 2. Summary of SDSs

	Product	Use	Length (pages)
Attachment C – Maintenance and Repair Shop SDS			
	Carbon Steel & Low Alloy Wire	GMAW, E70S	8
	Lincoln 6011	SMAW, E6011	19
	Loctite 567 PST Pipe Sealant	Pipe Sealant	5
	Loctite 592 Medium Strength Thread Sealant	Pipe Sealant	7
	Rectorseal No.5 Special	Pipe Sealant	6
	Parts Master Non-Chlorinated Brake and Parts Cleaner	Parts Cleaner	7
	Weld-On 724 Low VOC Cement	Pipe Glue	2
	Weld-On P-70 Low VOC Primer	Pipe Primer	2
	Mar-Proof H/S Lacquer Sanding Sealer	Wood Lacquer	13
Attachment D – Cooling Tower SDS			
	Brommax 7.1	Antimicrobial	4
	Bioguard Maintain Brominating Tablets	Antimicrobial	8
	SEI-226	Scale & Corrosion Inhibitor	2
	SEI-281	Algacide	7
	SEI-286 Biocide	Biocide	2

II. AIR COOLING OR VENTILATING EQUIPMENT

Emissions will be allocated to the appropriate release points in the Modeling Protocol to be prepared and submitted in the next step of the CAO program.

VI. ROUTINE MAINTENANCE, REPAIR, AND REPLACEMENT ACTIVITIES

PCC has not identified any regularly occurring maintenance or repair activities at LPC that represent a significant source of TACs beyond what has already been included in the emissions inventory, so routine maintenance, repair, and replacement activities should be considered an Exempt TEU.

VII. STORAGE TANKS

LPC has two diesel storage tanks: one at the steel foundry and one at the titanium foundry. Per the guidance, “TAC emissions from tanks storing diesel at ambient temperature and pressure do not need to be reported.” Therefore, the diesel storage tanks should be considered an Exempt TEU.

VIII. NATURAL GAS, PROPANE, AND LIQUEFIED PETROLEUM GAS (LPG) STORAGE TANKS AND TRANSFER EQUIPMENT

LPC has one propane storage tank which stores fuel for propane-powered forklifts. Propane use at LPC is not considered “extensive use” and is typical of an industrial facility. LPG storage tanks and transfer equipment should be considered an Exempt TEU under the guidance provided by the DEQ.

IX. PRESSURIZED TANKS CONTAINING GASEOUS COMPOUNDS

PCC utilizes pressurized tanks for activities at LPC. Gases used are not known to be a source of highly toxic compounds, so activities involving maintenances of the pressurized tanks should be considered an Exempt TEU.

XI. DIESEL COMBUSTION EMERGENCY GENERATORS

PCC operates five diesel emergency engines at LPC. Table 1 below provides details on these engines. Emissions from the diesel emergency engines will be incorporated into the facility TAC emissions inventory.