

ATTACHMENT B

MAINTENANCE AND REPAIR SHOP THRESHOLD ANALYSIS

Table 1
Threshold Analysis—Maintenance and Repair Shop Product Usage
PCC Structurals, Inc. - Large Parts Campus

Table 3-A. Product Summary

Product	TAC	CAS	Weight Percentage (%)	Specific Gravity	Annual Product Usage		Annual TAC Usage ^(a) (lb/yr)
					(gal/yr) ⁽¹⁾	(lb/yr)	
Loctite 567 PST Pipe Sealant	Ethylene glycol	107-21-1	0.55 ⁽²⁾	1.14 ⁽³⁾	0.22	2.09 ^(b)	0.012
Loctite 592 Medium Strength Thread Sealant	Cumene hydroperoxide	80-15-9	0.55 ⁽²⁾	1.21 ⁽³⁾	1.04	10.50 ^(b)	0.058
	Cumene	98-82-8	0.55 ⁽²⁾				0.058
Parts Master Non-Chlorinated Brake and Parts Cleaner	Acetone	67-64-1	55 ⁽²⁾	0.74 ⁽²⁾	--	1,575 ⁽¹⁾	866
	Xylenes (mixed isomers)	1330-20-7	10 ⁽²⁾				158
	Toluene	108-88-3	1.0 ⁽²⁾				15.8
Rectorseal No.5 Special	Diethylene Glycol Methyl Ether	111-77-3	16 ⁽³⁾	1.40 ⁽³⁾	0.125	1.46 ^(b)	0.23
WELD-ON 724 Low VOC Cement	Methyl Ethyl Ketone (MEK)	78-93-3	8.5 ⁽²⁾	0.984 ⁽³⁾	0.44	3.61 ^(b)	0.31
WELD-ON P-70 Low VOC Primer	Methyl Ethyl Ketone (MEK)	78-93-3	24 ⁽²⁾	0.858 ⁽³⁾	0.56	4.01 ^(b)	0.96
	Acetone	67-64-1	12.5 ⁽²⁾				0.50
Mar-Proof H/S Lacquer Sanding Sealer	Methyl Ethyl Ketone (MEK)	78-93-3	17.5 ⁽²⁾	0.91 ⁽³⁾	15.0	114 ^(b)	19.9
	Toluene	108-88-3	17.5 ⁽²⁾				19.9
	Isopropanol	67-63-0	5.5 ⁽²⁾				6.27
	N-Butyl Alcohol	71-36-3	5.5 ⁽²⁾				6.27

Table 3-B. TAC Summary

TAC	CAS	Total Annual Usage (lb/yr)	Reporting Threshold ⁽⁵⁾ (lb/yr)	Exceeds Reporting Threshold? (Yes/No)
Ethylene glycol	107-21-1	0.012	> 1,000	No
Cumene hydroperoxide	80-15-9	0.058	Not Listed	No
Cumene	98-82-8	0.058	> 1,000	No
Acetone	67-64-1	867	> 1,000	No
Xylenes (mixed isomers)	1330-20-7	158	> 1,000	No
Toluene	108-88-3	35.7	> 1,000	No
Diethylene Glycol Methyl Ether	111-77-3	0.23	Not Listed	No
Methyl Ethyl Ketone (MEK)	78-93-3	21.2	> 1,000	No
Isopropanol	67-63-0	6.27	> 1,000	No
N-Butyl Alcohol	71-36-3	6.27	> 1,000	No

NOTES:

gal = gallon.

lb = pound.

TAC = Toxic Air Contaminant.

yr = year.

(a) Annual TAC usage (lb/yr) = (annual product usage [lb/yr]) x (TAC weight percentage [%]) / 100

(b) Annual product usage (lb/yr) = (annual product usage [gal/yr]) x (specific gravity) x (8.345 lb/gal)

REFERENCES:

(1) Information provided by PCC Structurals, Inc. Represents 1.5 times the average annual purchases between 2019 and 2021.

(2) Information from product safety data sheet. Value represents average of the range.

(3) Information from product safety data sheet.

(4) Oregon Department of Environmental Quality "Cleaner Air Oregon Exempt TEU Reporting" (March 21, 2022), see Appendix A.

Table 2
Threshold Analysis—Maintenance and Repair Shop Welding
PCC Structurals, Inc. - Large Parts Campus

Reporting Threshold ⁽¹⁾ (lb/yr)	Welding Type	Electrode Type	PTE Annual Usage ⁽²⁾ (lb/yr)	Exceeds Reporting Threshold? ⁽³⁾ (Yes/No)
> 500	FCAW	E70T	--	--
		E71T	--	--
	GMAW	E70S	231	No
	SAW	EM12K	--	--
	SMAW	E6010	--	--
		E6011	5.50	No
		E6012	--	--
		E6013	--	--
		E7024	--	--
Total Annual Usage (lb/yr)		237	No	
> 50	FCAW	E110	--	--
	GMAW	E308	--	--
		ER316	--	--
		ERNiCrMo	--	--
		ERNiCu	--	--
	GTAW	Unlisted or Unspecified ⁽⁴⁾	2.50	Yes
	SMAW	E7018	216	Yes
		E7028	--	--
		E8018	--	--
		Eni-Cl	--	--
		Eni-Cu	--	--
Unlisted or Unspecified ⁽⁴⁾		87.0	Yes	
Total Annual Usage (lb/yr)		306	Yes	
> 0	FCAW	E11018	--	--
		E308	--	--
		E316	--	--
	SMAW	14Mn-4Cr	--	--
		E11018	--	--
		E308	--	--
		E310	--	--
		E316	47.0	Yes
		E410	--	--
		E9015	--	--
		E9018	--	--
		ECoCr	--	--
		ENiCrMo	--	--
Total Annual Usage (lb/yr)		47.0	Yes	

NOTES:

FCAW = flux core arc welding
GMAW = gas metal arc welding.
GTAW = gas tungsten arc welding.
lb = pound.
SAW = submerged arc welding.
SMAW = shielded metal arc welding.
yr = year.

REFERENCES:

- (1) Oregon Department of Environmental Quality "Cleaner Air Oregon Exempt TEU Reporting" (March 21, 2022), see Appendix B.
- (2) Information provided by PCC Structurals, Inc. Represents 1.5 times the average annual purchases between 2019 and 2021.
- (3) If the total exceeds a given reporting threshold, then each individual welding type within that reporting threshold category is shown as exceeding the threshold.
- (4) Assumed a reporting threshold of greater than 50 pounds per year for electrodes of unspecified classification or of a type not included in the DEQ guidance.