



# Oregon

Tina Kotek, Governor

## Department of Environmental Quality

### Agency Headquarters

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January 18, 2023

Bryan McCampbell  
PCC Structural, Inc.  
4600 SE Harney Drive  
Portland, OR 97206  
*Sent via email only*

Bryan McCampbell,

DEQ received the submittal of the Cleaner Air Oregon (CAO) Revised Baghouse Testing Conceptual Plan (Conceptual Plan) for the PCC Structural, Inc. Large Parts Campus (PCC-LPC) facility in Portland, OR on March 4, 2022 and has completed a final review.

In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ has determined that the following information, and corrections are required in a Source Test Plan by January 31, 2023, in order to complete source testing as required in DEQ's October 19, 2021 letter no later than March 2, 2023:

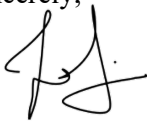
1. Test baghouse (BH) 8901, 9203, and 9256 during this source testing campaign. PCC-LPC originally proposed to test BH 8901, 8687, 9203, and 9256, completing at least two test runs at BH 8901, 8687, and 9203. PCC-LPC requested to only complete one test run at BH 9256. DEQ prefers to prioritize testing of BH 9256 and will not require testing of BH 8687 at this time.
2. Complete at least two test runs for each source, including BH 9256. DEQ understands that air casting is only performed one shift per week and that this requirement will mean that PCC may need to plan appropriately in order to complete the requested testing.
3. PCC and DEQ agree that, for baghouses with multiple stacks, the exhaust flowrate of each stack will be measured as part of testing. Please include this detail in your Source Test Plan.
4. Include a section discussing worst-case operating conditions as they pertain to Section 2.9 of DEQ's Source Sampling Manual in your Source Test Plan. Consider items including, but not limited to: Toxic Air Contaminant (TAC) content, operating temperatures, etc. in your discussion.
5. Include proposed alternative testing methods to SW-846 Method 0061 to test for hexavalent chromium if desired.

DEQ is requesting that you submit a Source Test Plan including the above information to complete your source testing and, ultimately, Emissions Inventory. If you think that any of that information is confidential, trade secret or otherwise exempt from disclosure, in whole or in part, you must comply with the requirements in OAR 340-214-0130 to identify this information. This includes clearly marking each page of the writing with a request for exemption from disclosure and stating the specific statutory provision under which you claim exemption. Emissions data is not exempt from disclosure.

DEQ remains available to discuss this information request with you and answer any questions you may have. Failure to provide additional information, corrections, or updates to DEQ by the deadlines above may result in a violation of OAR 340-245-0030(1).

If you have any questions regarding this letter, please contact me directly at 971.337.4102, jr.giska@deq.oregon.gov, and I look forward to your continued assistance with this process.

Sincerely,

A handwritten signature in black ink, appearing to be 'J.R. Giska', with a stylized flourish at the end.

J.R. Giska  
Cleaner Air Oregon Program Engineer

Cc: Brian Eagle, MFA  
Tom Wood, Stoel Rives  
David Graiver, DEQ  
Matthew Davis, DEQ  
Thomas Rhodes, DEQ  
File