

August 28, 2020

BY EMAIL

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Air Toxics Project Manager
Oregon Department of Environmental Quality
700 NE Multnomah Street, Suite 600
Portland, OR 97232

Re: Response to Cleaner Air Oregon Emissions Inventory Information Request

Dear Kenzie:

On March 17, 2020, PCC Structural (PCC) received your letter dated March 17, 2020 requesting that we respond to various comments and questions on the emissions inventory submitted January 2, 2020. A portion of our response was provided on June 15, and PCC committed to getting you the remainder via submittals due August 28, 2020 and October 30, 2020. By letter dated August 4, 2020, you provided PCC with a supplemental information request with a due date of September 3, 2020. This supplemental request requires that PCC perform considerable work on our PFDs and emission inventory. Based on our conversations we have prioritized the September 3 submittal, but, nonetheless, are providing the attached materials as our August 28 submittal. We trust that the materials provided with this letter will be of assistance as you review our emissions inventory and continue to familiarize yourself with our processes.

The materials included with this letter are the following:

Safety Data Sheets

We have included with this letter many of the safety data sheets (SDSs) that you requested, as shown in Attachment A. We are not able to send to you any materials that identify our specific alloy contents such as welding rod SDSs or the acid etch formulas due to confidentiality concerns. However, those materials are maintained on site and can be reviewed in person by DEQ staff during regular business hours. Please let me know if you would like to set up an appointment to review those materials.

Gating/Casting Ratio Table

You had asked several questions that relate to the proportion of our castings that is gating. As you know, gating is removed immediately after the metal is poured and the shell removed. As a result, the portion of metal represented by gating does not undergo our backend operations. We track the amount of metal removed as gating and I have included in Attachment B a table reviewing the past 3 years of production at LPC. You will see that the proportion of final casting weight to gating weight differs markedly between our steel casting process and our titanium casting process.

Heat Treat Stack Test Report

You had requested technical support for emission factors used in the emissions inventory. Bison Engineering recently completed an engineering assessment of our heat treat process and so included in Attachment C of this submittal is the report prepared by Bison Engineering evaluating particulate and metals emissions from the heat treat process. The values from this study will be reflected in the revised emissions inventory we are targeting for submittal on September 3rd. Note that the report does not focus on alloy content which was the prior basis of our emissions estimate. It is not the alloy content of the part being heated that drives the metal emissions from the heat treat process. The part(s) being heat treated are inside containers when heat treating occurs to minimize the potential for oxidation. As a result of this covering, and the fact that the heat treat furnace does not heat the part to levels where metal would volatilize, the alloy content of the part being heat treated is irrelevant. Instead, emissions are driven by the attributes of the heat treat process itself. That fact is represented in the new emission factors derived from the Bison study.

2018 Production Data and Oxidizer Down Time

Attached D includes the 2018 annual report. This report includes documentation of the LPC 2018 production levels and the oxidizer down time.

Why PTE is Less Than Actual?

You had requested that we state why for certain emission units the potential to emit is less than the actual 2018 emissions. This is straightforward. Although PCC is currently seeing dramatically lower throughput levels, this is not reflected in our PTE calculations. What is causing the decrease in emissions between the 2018 actual emissions and the PTE is that PCC is continuously upgrading the controls at the LPC facility. Where you see a decrease in emissions, it is because new or improved controls have been added to the process during or since 2018.

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The remainder of what was requested by you in the March 17 letter will be submitted on or before October 30 as promised. We anticipate that on or before September 3rd we shall submit to you the following materials:

1. Revised emissions inventory (PTE)
2. Revised site diagrams
3. Revised Process Flow Diagrams (PFDs)

Please let me know if you have any questions after reviewing this letter. Do not be surprised if I am slow getting back to you as COVID continues to present communications challenges.

Very truly yours,



Sherry Uchytel

cc: Bryan McCampbell
Tom Wood (Stoel Rives)
Brian Eagle (MFA)

List of Attachments:

Attachment	Description	Number of Pages
Attachment A	Hot Top SDS	6
	Diethylene Glycol SDS (investing)	5
	PM Glycol Ether SDS (investing)	12
	DPM Glycol Ether SDS (investing)	11
	Dykem SDS	4
	Mold Release SDS	8
	Alloy Service Center Ink MK-20 SDS (PTE)	4
	Alloy Service Center Ink MK-10 SDS (PTE)	4
	Alloy Service Center Spray Ink SDS (2018)	12
	Alloy Service Center RustOleum SDS (2018)	7
Attachment B	Parts/Gating Ratio	1
Attachment C	Heat Treat Furnace Stack Test	137
Attachment D	2018 Annual Report	6