



Oregon

Kate Brown, Governor

Department of Environmental Quality
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August 4, 2020

Sherry Uchytel
PCC Structural, Inc.
4600 SE Harney Drive
Portland, OR 97206

Dear Ms. Uchytel,

DEQ received information provided by PCC Structural, Inc. Large Parts Campus (PCC-LPC) dated June 15, 2020. Thank you for providing the additional information regarding facility emissions. DEQ has reviewed these submittals and has the following comments and required changes identified below. In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ requests that PCC-LPC revise and resubmit the complete Emissions Inventory, including process flow diagrams, and site diagrams by **September 3, 2020** in order to complete our review of these documents.

General Comments

The TEU designations in the process flow diagrams and site diagrams PCC-LPC submitted in June were consistent with the Emissions Inventory submitted in January 2020. In our March 2020 response to the January 2020 submittal, DEQ requested that PCC-LPC revise the Emissions Inventory to designate TEUs and control devices as distinct and separate units. The Emissions Inventory submitted in January and process flow and site diagrams submitted in June identified baghouses as TEUs, which does not address this stated request, and is not consistent with the TEU definition in OAR 340-245-0020(61):

“Toxics emissions unit” or “TEU” means an emissions unit or one or more individual emissions producing activities that emit or have the potential to emit any toxic air contaminant, as designated under OAR 340-245-0060.

DEQ cannot approve an Emissions Inventory that designates control devices as TEUs. TEUs must be designated as is consistent with their definition and designation rules cited in OAR 340-245-0020(61) and OAR 340-245-0060(1), respectively. Emissions producing activities are specific processes that generate toxic air contaminants (TACs), such as casting, welding, torch cutoff and other activities. Control devices are equipment or processes that reduce air contaminant emissions from one or more emissions producing activity. The distinction as established in rule is important as it requires DEQ and the source to fully understand each source of emissions, and regulate these sources as needed. DEQ does not consider the collection of dust by a control device as an emissions producing activity. The TEU designations must be revised on all submittals and remain consistent between the revised Emissions Inventory and process flow and site diagrams.

Specific Comments

Please revise the Emissions Inventory as summarized below:

1. Designate process units or activities that generate TACs as TEUs as discussed above and not as control devices (i.e., baghouses). Identify these TEUs in column A of the tab labeled, "2. Emissions Units & Activities" in the AQ405CAO form and revise their corresponding activities in columns H through M to reflect actual throughput or material usages for these process units.
2. Identify control devices connected to TEUs in Column C of the tab labeled, "2. Emissions Units & Activities" in the AQ405CAO form. Please ensure that you identify TEUs and control devices separately.
3. In accordance with OAR 340-245-0040(3)(a)(B), revise your Emissions Inventory to provide production, fuel, and material usage rates used to calculate TAC emissions from each of the revised TEUs.

Please revise the process flow diagrams as summarized below:

4. Revise the process flow diagrams to clearly delineate different process steps by TEU, control device, and emission point. Attached please find an example process flow diagram for a foundry that provides the level of detail required for DEQ's understanding of facility processes.

Please revise the site diagrams as summarized below:

5. Revise the site diagrams to identify TEUs and control devices as referenced in Numbers 1 and 2 above. For example, provide TEUs present in the Finishing building that are routed to their corresponding baghouse. Exact spatial coordinates are not required until the Modeling Protocol, but site diagrams should contain the information requested in Numbers 1 and 2 above.

Confidential or trade secret information submitted to DEQ

DEQ is requesting that you submit additional information to complete your TAC 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.

Submittal Deadlines

If you have any questions or need clarifications regarding the above comments please contact me directly in advance of any submittal deadline. Submit the revised Emissions Inventory, process flow diagrams, and site diagrams for DEQ review by **September 3, 2020**.

Please continue to submit information requested in our March 17, 2020 letter on or before the dates specified in the extension request approval letter dated June 3, 2020.

Failure to provide additional information or corrections required by DEQ in this correspondence, and previous DEQ responses by this date may result in a violation of OAR 340-245-0030(1) and OAR 340-245-0040(1).

Please contact me directly at 503.229.5247 or billings.kenzie@deq.state.or.us, and we look forward to

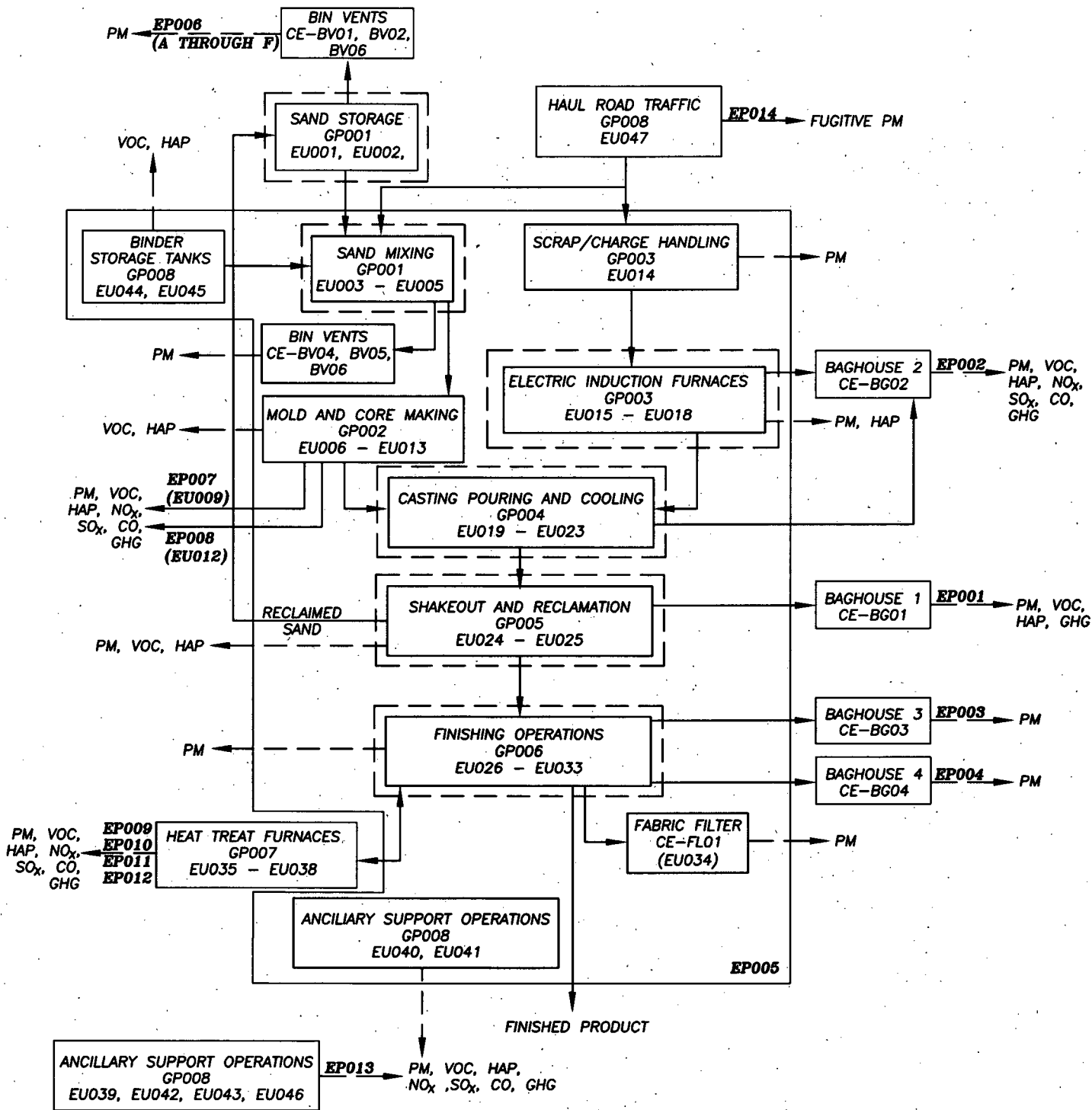
your continued assistance with this process.

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

Cc: Bryan Trotter, PCC Structural
Bryan McCampbell, PCC Structural
Brian Eagle, MFA
Tom Wood, Stoel Rives LLP
Keith Johnson, DEQ
Steve Dietrich, DEQ
David Graiver, DEQ

Encl: Example Process Flow Diagram



LEGEND:

- EMISSION POINT (EP)
- EMISSION UNIT (EU) CONTROLLED BY
- CONTROL EQUIPMENT (CE)

NOTES:

1. PARTICULATE MATTER (PM) INCLUDES PM, PM10, AND PM2.5.

AQUATERRA

ENVIRONMENTAL SOLUTIONS, INC.
14755 Grover Street
Omaha, Nebraska 68144

PROCESS FLOW DIAGRAM
NDEQ AIR CONSTRUCTION PERMIT APPLICATION
OMAHA STEEL CASTINGS, CO.
WAHOO, NEBRASKA

Project Mgr. MAC	Drawn By MAC	Designed By MAC	Project No. 5198.10
Scale No Scale	Date 10/22/2012	File Name OSC Process Flow.dwg	Figure No. 3