



Oregon

Kate Brown, Governor

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

Ms. Uchtyl,

DEQ received the Cleaner Air Oregon Air Toxics Emissions Inventory Form AQ405CAO (Inventory) for the PCC Structural, Inc. Large Parts Campus (PCC-LPC) facility in Portland, OR on January 2, 2020. In accordance with Oregon Administrative Rule (OAR) 340-245-0030(2), DEQ requests additional information by May 1, 2020 in order to complete our review of this Inventory. DEQ acknowledges that there may be resource disruptions to manage related to the current COVID-19 response measures. If you anticipate needing additional time to submit your response, please make that request via email.

DEQ acknowledges the challenges in establishing an accurate inventory of emissions for this complex facility. Filling these data gaps is a high priority as having an accurate representation of current and potential future emissions at this facility is critical for submitting an approvable risk assessment. DEQ's comments are organized into two sections below: (I) General Comments and (II) Specific Comments.

I. General Comments

1. In order to better understand facility operations and review submittals, DEQ requests that PCC submit a detailed process flow diagram (PFD) for the facility and corresponding site diagrams. DEQ has requested this information in the Inventory in order to ensure consistency between the emission points and emission rates provided in the Inventory to those that will be provided in the subsequent Modeling Protocol. Please ensure these documents:
 - a. Include all Toxics Emissions Units (TEUs) as defined in OAR 340-245-0020(60) that emit TACs listed in OAR 340-245-8020 Table 2, including all significant and aggregate TEUs.
 - b. Indicate all corresponding emission points for TEUs identified in (a) above, and designate these emission points (e.g., exhaust stacks, control devices, fugitive) with an identification distinctly separate from the TEUs.
 - c. Include TEUs you determine to be exempt as defined in OAR 340-245-0060(3).
 - d. Provide clear and detailed guidance for determining the corresponding location of TEUs and emission points provided in the PFD on the site diagrams.
2. For TEUs designated as exempt, substantiate that each TEU meets the applicable criteria as defined in OAR 340-245-0060(3). Please include all TEUs that may have been considered exempt in your previous submission under OAR 340-200-0020(23)(a).

3. Toxics Emissions Unit Information: revise the emissions inventory to designate TEUs and control devices as distinct and separate units. For example, the toxic emissions unit ID of 'Baghouse 9031' should be identified as a single TEU (e.g., welding device or devices routed to a single emission point), and the control device should be listed as Baghouse 9031 with a specification of applicable additional filtration devices (e.g., HEPA or ULPA filters).
4. Stack/Fugitive Information: Please provide a distinct identification for each stack and fugitive source.
5. Provide all supporting calculation tables, including but not limited to the emission estimates tables provided with the original Inventory, in Excel format for DEQ review.
6. Per OAR 340-245-0040(i) & (ii), actual production or usage and potential production or usage data must be submitted for DEQ review. Submit production data so that DEQ can verify the production and usage values presented in the 'CAO_CBI_26-1867_2018.xlsx' document submitted as a PDF for DEQ review.
7. In instances where the 'Requested PTE' activity is less than the 'Actual' activity levels reported for the 2018 calendar year, provide supporting information to substantiate the lower activity levels in the 'Requested PTE'.

II. Specific Comments

Due to the large volume of data requested, DEQ compiled a table of comments pertaining to specific notes and references provided by PCC-LPC in the supporting calculations as prepared by Maul Foster Alongi for both 2018 and PTE emissions estimates. Please address these comments for both actual activity levels and requested PTE levels. Please see the attached table for specific comments and data requests that pertain to supporting tables.

Confidential or trade secret information submitted to DEQ

DEQ is requesting that you submit additional information to complete your Toxic Air Contaminant 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

Please communicate any questions or clarifications regarding the above comments proactively in order to provide timely submittals. Submit the requested supporting information for DEQ review by **May 1, 2020**. DEQ requests that you coordinate a meeting at the appropriate time and prior to the May 1, 2020 due date to ensure that the materials we have requested and your preparation of the requested materials are in alignment.

DEQ remains available during this timeframe to discuss the submittal with you and answer any questions you may have. Failure to provide additional information or corrections required by DEQ 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, billings.kenzie@deq.state.or.us, and we look forward to your

continued assistance with this process.

Sincerely,

Kenzie Billings
DEQ CAO Project Manager

Enclosures: DEQ Specific Comments on PCC Structural, Inc. – Large Parts Campus PTE TAC
Emission Estimates (Confidential)
DEQ Specific Comments on PCC Structural, Inc. – Large Parts Campus 2018 TAC
Emission Estimates (Confidential)

Cc: Bryan Trotter, PCC Structural
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