

# Public Notice

## DEQ Requests Comments on the Cascade Corporation's Proposed Air Quality Permit

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of the Cascade Corporation's proposed air quality permit renewal, known officially as a Standard Air Contaminant Discharge Permit.

### Summary

DEQ proposes to renew the air quality permit for this facility. The permit renewal incorporates changes in Oregon rules since the prior permit renewal and identifies equipment that exists at the facility not addressed by the current permit.

### How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

NWR AQ Permit Coordinator  
700 NE Multnomah Street Ste 600  
Portland, OR 97232

**Fax:** 503-229-6945

**Email:** [nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

Written comments are due by 5 p.m. Friday October 23, 2020.

### About the facility

Cascade Corporation is located at 2201 NE 201st Ave. in Fairview. The existing permit was renewed on Oct. 10, 2007 and was originally scheduled to expire on June 1, 2012. The permittee manufactures hydraulic lift truck attachments.

### What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

### How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

### How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally-approved monitoring practices and standards.

Cascade Corporation is required to submit annual reports to DEQ for review. Periodic inspections of the facility will be conducted by DEQ to ensure proper operations.

### What happens after the public comment period ends?

DEQ will review and respond to any comments received, and may make changes to the permit in response. The permit will be renewed for a period of five years.

### Where can I get more information?

Find out more and view the application at <https://go.usa.gov/xEJf2> or contact the Northwest Region Air Quality Permit Coordinator at:

**Phone:** 503-229-5582 or 800-452-4011

**Fax:** 503-229-6945

**Email:** [nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

View the application and related documents in person at the DEQ office in Portland. For a review appointment, call Northwest Region Air Quality Permit Coordinator at 503-229-5582.

### Alternative Formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).



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Environmental  
Quality

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[www.oregon.gov/DEQ](http://www.oregon.gov/DEQ)

*DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.*

**Emissions limits**

**Criteria Pollutants:** Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

**Table 1**

<b>Criteria Pollutant</b>	<b>Current Limit (tons/yr)</b>	<b>Proposed Limit (tons/yr)</b>
Particulate matter	-	24
Small particulate matter	-	14
Fine particulate matter	-	9
Nitrogen oxides	-	39
Carbon monoxide	-	99
Volatile organic compounds	54	54
Greenhouse Gases (CO2e)	-	74,000

For more information about criteria pollutants, go to: [www.epa.gov/criteria-air-pollutants](http://www.epa.gov/criteria-air-pollutants)

**Hazardous air pollutants:**

Cascade Corporation is not a major source of hazardous air pollutants; however, EPA has determined that businesses similar to this facility, as a group, emit enough hazardous air pollutants to warrant regulation. Therefore, this source is subject to the National Emission Standard for Hazardous Air Pollutants: Subpart ZZZZ for Reciprocating Internal Combustion Engines. More detailed information can be found in the review report.

For more information about hazardous air pollutants, go to: <https://www.epa.gov/haps>



**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**STANDARD**  
**AIR CONTAMINANT DISCHARGE PERMIT**

Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, OR 97232

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

**ISSUED TO:**

Cascade Corporation  
P.O. Box 20187  
Portland, OR 97294-0187

**INFORMATION RELIED UPON:**

Application No.: 026766  
Date Received: 3/9/2012

**PLANT SITE LOCATION:**

Cascade Corporation  
2201 NE 201<sup>st</sup> Ave  
Fairview, OR 97024-9718

**LAND USE COMPATIBILITY FINDING:**

Approving Authority: City of Gresham  
Approval Date: 12/17/1991

**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

\_\_\_\_\_  
Matt Hoffman, Northwest Region Air Quality Manager

\_\_\_\_\_  
Dated

## Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

<b>Table 1 Code</b>	<b>Source Description</b>	<b>SIC/NAICS</b>
Part B, #78	Surface coating in manufacturing subject to RACT under OAR 340 Division 232.	3537 / 333924
Part C, #3	All sources electing to maintain the source's netting basis.	n/a

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## 1.0 DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

The devices, processes, and pollution control devices regulated by this permit are the following:

Devices and Processes Description	Device ID	Pollution Control Device Description	PCD ID
Spray Booth	1B	Binks Filter	1B
Spray Booth	2B	Binks Filter	2B
Small Paint Booth	M3	Dry Filter	MF-3
Pangborn RotoBlast	BH-1	Baghouse	BH-1
Welding Operations	Welding	Dust collectors	NA
Grinding Operations	Grinding	Dust collectors	NA
Samco Water Evaporator	WE-1	None	NA
Kohler Emergency Generator	EG-1	None	NA

## 2.0 GENERAL EMISSION STANDARDS AND LIMITS

### 2.1. Visible Emissions

The permittee must not allow visible emissions to exceed 20% opacity from air contaminant sources other than fugitive emission sources, as applicable. Opacity must be measured as a six-minute block average using EPA Method 9, or an alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.

### 2.2. Fugitive Emissions

- a. At least weekly, the permittee must conduct a six (6) minute visible emission survey of the property boundary downwind from the fugitive emissions sources using EPA Method 22. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9 including using the proper location to observe visible emissions. For purposes of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. No monitoring is required if the entire facility is shut down. [OAR 340-208-0210]
  - i. If visible fugitive emissions are detected at the property boundary for more than 5% (18 seconds) of the survey time, the permittee must take corrective action which includes the following:

- A. Using, where possible, water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - B. Applying water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - C. Enclosing (full or partial) materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter, including dust, from becoming airborne;
  - D. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - E. Installing adequate containment during sandblasting or other similar operations;
  - F. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
  - G. Developing a DEQ approved fugitive emission control plan upon request by DEQ if the above precautions are not adequate and implementing the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
- ii. If no visible fugitive emissions are detected at the property boundary or visible fugitive emissions are detected for less than or equal to 5% (18 seconds) of the survey time for consecutive four (4) weeks, the permittee may conduct visible emission surveys monthly rather than weekly. If visible fugitive emissions are detected at the property boundary during the monthly surveys, the surveys must be conducted weekly.
  - iii. The permittee must record the corrective action taken or the results of the EPA Method 22 tests in a log.
- b. In no case may fugitive dust emissions leave the property of a source for a period or periods totaling more than 18 seconds in a six-minute period.

### **2.3. Particulate Matter Emissions**

The permittee must comply with the following particulate matter emission limits.

- a. Particulate matter emissions from any air containment source installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 must not exceed 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)(B)]
- b. Particulate matter emissions from any device or process that is installed, constructed or modified after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2)(c)]

#### **2.4. Particulate Matter Fallout**

The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0450]

#### **2.5. Nuisance and Odors**

The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300] The permittee must maintain a log of each nuisance complaint received by the permittee. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and provide a response to the complainant within 24 hours, if possible.

#### **2.6. Fuels and Fuel Sulfur Content**

- a. The permittee must not use any fuels other than natural gas, propane, butane or any of the ASTM grade fuel oils listed below. The sulfur content cannot exceed:
  - i. 0.0015% sulfur by weight for ultra low sulfur diesel;
  - ii. 0.3% sulfur by weight for ASTM Grade 1 distillate oil; [OAR 340-228-0110] or
  - iii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil. [OAR 340-228-0110]

### **3.0 OPERATION AND MAINTENANCE REQUIREMENTS**

#### **3.1. Operation of Pollution Control Devices and Processes**

The permittee must operate and ensure proper functioning of all air pollution control devices and components at all times when the associated emission source is operating. [OAR 340-226-0120]

#### **3.2. Operating Conditions for Emergency Stationary RICE**

The permittee must operate emergency stationary RICE EG-1 in compliance with the following conditions: [40 CFR 63.6640(f)]

- a. There is no time limit on the use of emergency stationary RICE in emergency situations.
- b. Emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by the manufacturer, the vendor, or the insurance company associated with the engine. Required maintenance and testing of such units is limited to 50 hours per year.

- c. The permittee is prohibited from using any emergency stationary RICE for any non-emergency use including but not limited to peak shaving, demand response operation, and/or generation of income from the sale of power. To perform such activity, the permittee must first obtain a modified permit in accordance with Condition 9.2 or a separate permit for power generation that appropriately addresses and allows this activity.

### **3.3. Operation and Maintenance for Emergency Stationary RICE**

The permittee must comply with the following requirements for EG-1 emergency stationary reciprocating internal combustion engine (RICE). [40 CFR 63.6640(f)]

- a. At all times, operate and maintain any affected sources, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions; [40 CFR 63.6640(f)]
- b. Change oil and filter every 500 hours of operation or annually, whichever comes first; [40 CFR 63.6603(a), table 2d(4)(a)]
- c. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; [40 CFR 63.6603(a), table 2d(4)(b)]
- d. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; [40 CFR 63.6603(a), table 2d(4)(c)]
- e. The permittee must operate and maintain each stationary RICE according to the manufacturer's emission-related written instructions. If the permittee develops their own maintenance plan and it is approved by DEQ, that plan may substitute for the manufacturer's instructions; [40 CFR 63.6625(e)]
- f. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes; and [40 CFR 63.6603(a), table 2d]
- g. The permittee must install a non-resettable hour meter on each emergency stationary RICE, if one is not already installed. [40 CFR 63.6625(f)]

### **3.4. Highest and Best Practicable Treatment and Control**

The permittee must provide the highest and best practicable treatment and control of air contaminant emissions in every case so as to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling, and other deleterious factors at the lowest possible levels as provided below. [OAR 340-226-0100]

- a. The permittee must take corrective action to return to highest and best practicable treatment and control if the baghouse BH-1 pressure drop deviates from the DEQ approved action level range of 1 inch to 3 inches of water. The action level is not applicable during periods of bag shaking or reverse air cleaning.
- b. The exceedance of an action level shall not be considered a violation of an emission limit in this permit. [OAR 340-226-0120(2)(d)]

**3.5. Work Practices**

The permittee is required to conduct a monthly walk-through inspection to ensure that VOC containing materials and rags are stored in closed containers and to meet the following work practices:

- a. VOC containing materials must be stored in closed containers.
- b. Used rags containing solvent must be stored in closed containers.

**4.0 PLANT SITE EMISSION LIMITS****4.1. Plant Site Emission Limits (PSEL)**

The permittee must not cause or allow plant site emissions to exceed the following: [OAR 340-222-0040 and/or OAR 340-222-0041, OAR 340-222-0060]

<b>Pollutant</b>	<b>Limit</b>	<b>Units</b>
PM	24	tons per year
PM <sub>10</sub>	14	
PM <sub>2.5</sub>	9	
NO <sub>x</sub>	39	
CO	99	
VOC	54	
GHGs (CO <sub>2</sub> e)	74,000	

**4.2. Annual Period**

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

## 5.0 COMPLIANCE DEMONSTRATION

### 5.1. Monitoring Requirements

The permittee must monitor the operation and maintenance of the facility and associated air contaminant control devices as follows: [OAR 340-226-0120]

- a. Record pressure drop on BH-1 baghouse monthly in a log.
- b. Record filter replacement and maintenance on paint booth filters in a log.
- c. Record amount of natural gas combusted on a monthly basis.
- d. Record amount of abrasive used on a monthly basis.
- e. Record amount of electrode used on a monthly basis.
- f. Record hours of emergency generator use monthly.
- g. Record emergency generator maintenance including oil changes, per Condition 3.3 in a log.

### 5.2. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant except GHGs: [OAR 340-222-0080]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

E = pollutant emissions (tons/year);

$\Sigma$  = symbol representing “summation of”;

EF = pollutant emission factor (see Condition 12.0);

P = process production (see Condition 13.0)

### 5.3. Emission Factors

The permittee must use the default emission factors provided in Condition 12.0 for calculating pollutant emissions, unless alternative emission factors are approved in writing by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ. [OAR 340-222-0080]

**5.4. Greenhouse Gas Emissions**

The permittee must calculate greenhouse gas emissions in metric tons and short tons for each 12-consecutive calendar month period to determine compliance with the GHG PSEL by using DEQ Fuel Combustion Greenhouse Gas Calculator

<https://www.oregon.gov/deq/FilterDocs/ghgCalculatorFuelCombust.xlsx>. [OAR 340-215-0040]

**5.5. Mass Balance without controls**

The permittee must calculate the VOC emissions for each 12 consecutive calendar month period based on the following formula: [OAR 340-222-0080]

$$E_{\text{VOC-A}} = [\sum(C_x \times D_x \times K_x) - W] \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

$E_{\text{VOC-A}}$  = VOC emissions in tons/year

$\Sigma$  = symbol representing “summation of”;

$C$  = Material usage for the period in gallons

$D$  = Material density in pounds per gallon

$K$  = VOC concentration in pounds of VOC per pound of material, expressed as a decimal

$x$  = Subscript  $x$  represents a specific material

$W$  = Weight of VOC shipped offsite in pounds

**5.6. Mass Balance with controls**

The permittee must calculate the PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from coating operations for each 12 consecutive calendar month period based on the following formula: [OAR 340-222-0080]

$$E_{\text{PM-A}} = [\sum(C_x \times D_x \times K_x)] \times (1 - \text{TR}) \times (1 - \text{CE}) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

$E_{\text{PM-A}}$  = Annual PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions in tons

$C$  = Material usage for the period in gallons

$D$  = Material density in pounds per gallon

- K = Solid fraction in pounds of solid per pound of material, expressed as a decimal
- x = Subscript x represents a specific material
- TR = Spraying transfer efficiency expressed as a decimal
- CE = PM/PM<sub>10</sub>/PM<sub>2.5</sub> control efficiency expressed as a decimal

### **5.7. PSEL Compliance Monitoring**

The permittee must demonstrate compliance with the PSEL by totaling the emissions from all point sources calculated under Conditions 5.2, 5.4, 5.5, and 5.6. [OAR 340-222-0080]

## **6.0 SPECIAL CONDITIONS**

### **6.1. Surface Coating in Manufacturing RACT Emission Limitations**

The permittee must ensure that VOC emitted from surface coating of metal parts and products does not exceed the following limits. These limits are based on a daily weighted average of all coatings used or documentation that only surface coating material that meet the RACT limit is used. The compliance with RACT for the small quantity material use, such as, aerosol cans, slip plate coating, ink roll on coating, and the spray booth M3 is monitored on a monthly basis and averaged to demonstrate compliance with the 3.5 lb VOC/gal RACT limit on a daily basis. [OAR 340-232-0160(5)(j)]

- a. 3.5 pounds of VOC per gallon, as applied, less water and exempt solvents for coatings and thinners forced air dried / air dried, and for extreme performance coatings;
- b. 3.0 pounds of VOC per gallon, as applied, less water and exempt solvents for “other coatings” (powder, oven dried).
- c. "Oven dried" means a coating which is dried, baked, cured, or polymerized at temperatures over 90°C (194°F).

### **6.2. NESHAP – Subpart HHHHHH for Miscellaneous Surface Coating Operations**

The permittee is prohibited from using surface coatings containing compounds of chromium, lead, nickel, or cadmium, in concentrations greater than 0.1% by mass, or of manganese in concentration greater than 1% by mass, unless and until it obtains an appropriately modified permit from DEQ containing conditions that address and allow such activity.

## 7.0 RECORDKEEPING REQUIREMENTS

### 7.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the facility and associated air contaminant control devices: [OAR 340-214-0114]

- a. Baghouse maintenance logs and pressure drop records, normal pressure range exceedances, including date, time, duration, cause and corrective actions, upon occurrence of exceedances, per Conditions 3.4.a and 5.1.a.
- b. Filter replacement logs for the paint spray booths.
- c. Visible emissions Method 22 survey log per Condition 2.1.
- d. Monthly records of natural gas combusted.
- e. Monthly records of abrasive used.
- f. Monthly records of electrode used.
- g. The following records for emergency stationary RICE EG-1: [40 CFR 63.6655(f)]
  - i. Date, start time, end time and hours of operation of the emergency stationary RICE that is recorded through the non-resettable hour meter;
  - ii. Notification of the emergency situation; including what classified the operation as emergency;
  - iii. Date, start time, end time and hours of non-emergency operation used for maintenance checks and readiness testing; and
  - iv. Records of operation and maintenance requirements in Condition 3.3.

### 7.2. Excess Emissions

- a. The permittee must maintain the records of excess emissions listed below and as defined in OAR 340-214-0300 through 340-214-0340, recorded on occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity as a six-minute block average.
  - i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
  - ii. The date and time the permittee notified DEQ of the event;
  - iii. The equipment involved;
  - iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;

- v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
  - vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations); and
  - vii. The final resolution of the cause of the excess emissions;
- b. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).
  - c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - d. The permittee must maintain a log of all excess emissions in accordance with OAR 340-214-0340(3).

### **7.3. Complaint Log**

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution concerns associated to the permitted facility. Documentation must include date of contact, date and time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and date and time of response to complainant. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. [OAR 340-214-0114]

### **7.4. Retention of Records**

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite. [OAR 340-214-0114]

## 8.0 REPORTING REQUIREMENTS

### 8.1. Excess Emissions

- a. The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health.
- b. The permittee must also submit follow-up reports summarizing records of excess emissions as required in Condition 7.2 when required by DEQ. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 10.0 by email, telephone, facsimile, or in person.

### 8.2. Annual Report

For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) paper copies and one (1) electronic copy of the following information for the previous calendar year:

- a. Operating parameters:
  - i. Provide a statement of the facilities compliance status with the RACT conditions of the permit.
  - ii. Records of exceedances of baghouse pressure drop normal range, including date, time, duration, cause and corrective actions, upon occurrence of exceedances, per Condition 7.1.a.
  - iii. Records of natural gas combusted, abrasive used, and welding electrodes used per Conditions 7.1.d, 7.1.e, and 7.1.f.
- b. Calculations of annual pollutant emissions determined each month in accordance with Conditions 5.2, 5.4, 5.5, and 5.6.
- c. A brief summary listing the date, time, and the affected device/process for each excess emission that occurred during the reporting period.
- d. Summary of complaints relating to air quality received by permittee during the year in accordance with Condition 7.3.
- e. The following records for each emergency stationary RICE identified: [40 CFR 63.6655(f)]
  - i. Hours of operation of each emergency stationary RICE that is recorded through the non-resettable hour meter;
  - ii. Hours of emergency operation; including what classified the operation as emergency; and
  - iii. Hours of non-emergency operation used for maintenance checks and readiness testing.

- f. List permanent changes made in facility process, production levels, and pollution control equipment which affected air contaminant emissions.
- g. List major maintenance performed on pollution control equipment.

### **8.3. Greenhouse Gas Registration and Reporting**

- a. If the calendar year greenhouse gas emissions (CO<sub>2</sub>e) are ever greater than or equal to 2,756 tons (2,500 metric tons), the permittee must annually register and report its greenhouse gas emissions with DEQ in accordance with OAR 340 division 215.
- b. If the calendar year greenhouse gas emissions (CO<sub>2</sub>e) are less than 2,756 tons (2,500 metric tons) for three consecutive years, the permittee may stop reporting greenhouse gas emissions but must retain all records used to calculate greenhouse gas emissions for the five years following the last year that they were required to report. The permittee must resume reporting its greenhouse gas emissions if the calendar year greenhouse gas emissions (CO<sub>2</sub>e) are greater than or equal to 2,756 tons (2,500 metric tons) in any subsequent calendar year.

### **8.4. Notice of Change of Ownership or Company Name**

The permittee must notify DEQ in writing using a DEQ “Transfer Application Form” within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

### **8.5. Construction or Modification Notices**

The permittee must notify DEQ in writing using a DEQ “Notice of Intent to Construct Form,” or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

### **8.6. Air Toxics Emission Inventory**

The permittee must submit an air toxics emission inventory every three years. DEQ will notify the permittee in writing and provide a reporting form. [OAR 340-245-0040]

## **9.0 ADMINISTRATIVE REQUIREMENTS**

### **9.1. Permit Renewal Application**

The permittee must submit the completed application package for renewal of this permit **180 days prior to the expiration date**. Two (2) paper copies and one (1) electronic copy of the application must be submitted to the DEQ Permit Coordinator listed in Condition 10.2. [OAR 340-216-0040]

### **9.2. Permit Modifications**

Application for a modification of this permit must be submitted within 60 days prior to the source modification. When preparing an application, the applicant should also consider submitting the application 180 days prior to allow DEQ adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office.

### **9.3. Annual Compliance Fee**

The permittee must pay the annual fees specified in OAR 340-216-8020, Table 2, Parts 2 and 3 for a Standard ACDP on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

### **9.4. Change of Ownership or Company Name Fee**

The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 4 with an application for changing the ownership or the name of the company.

### **9.5. Special Activity Fees**

The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, Part 4 with an application to modify the permit.

## **10.0 DEQ CONTACTS / ADDRESSES**

### **10.1. Business Office**

The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

Oregon Dept. of Environmental Quality  
Financial Services – Revenue Section  
700 NE Multnomah St., Suite 600  
Portland, OR 97232-4100

### **10.2. Permit Coordinator**

The permittee must submit all notices, reports (annual reports, source test plans and reports, etc.), and applications that do not include payment to the Permit Coordinator.

Oregon Dept. of Environmental Quality  
Northwest Region Air Quality  
Permit Coordinator  
700 NE Multnomah St., Suite 600  
Portland, OR 97232-4100  
[nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

### **10.3. Report Submittals**

Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Region. If you know the name of the Air Quality staff member responsible for your permit, please include it:

Oregon Dept. of Environmental Quality  
Northwest Region Air Quality  
700 NE Multnomah St., Suite 600  
Portland, OR 97232-4100

### **10.4. Web Site**

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at [www.oregon.gov/deq/](http://www.oregon.gov/deq/).

## **11.0 GENERAL CONDITIONS AND DISCLAIMERS**

### **11.1. Permitted Activities**

- a. Until this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from the following:
  - i. Processes and activities directly related to or associated with the devices/processes listed in Condition 1.0 of this permit;
  - ii. Any categorically insignificant activities, as defined in OAR 340-200-0020, at the source; and
  - iii. Construction or modification changes that are Type 1 or Type 2 changes under OAR 340-210-0225 that are approved by DEQ in accordance with OAR 340-210-0215 through 0250, if the permittee complies with all of the conditions of DEQ's approval to construct and all of the conditions of this permit.
- b. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

### **11.2. Other Regulations**

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

### **11.3. Conflicting Conditions**

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. [OAR 340-200-0010]

### **11.4. Masking of Emissions**

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400]

**11.5. DEQ Access**

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.

**11.6. Permit Availability**

The permittee must have a copy of the permit available at the facility at all times. [OAR 340-216-0020(3)]

**11.7. Open Burning**

The permittee may not conduct any open burning except as allowed by OAR 340, division 264.

**11.8. Asbestos**

The permittee must comply with the asbestos abatement requirements in OAR 340, division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

**11.9. Property Rights**

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

**11.10. Permit Expiration**

- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit: [OAR 340-216-0082]
  - i. A timely and complete application for renewal of this permit or for a different ACDP has been submitted; or
  - ii. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
  - iii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit,

a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

### 11.11. Permit Termination, Revocation, or Modification

DEQ may terminate, revoke, or modify this permit pursuant to OAR chapter 340 division 216. [OAR 340-216-0082].

## 12.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Natural Gas Combustion Sources	PM	2.5	lb / MMcf natural gas	DEQ AQ-EF05 for natural gas fired medium boilers (<100 MMBTU/hr) uncontrolled
	PM <sub>10</sub>	2.5		
	PM <sub>2.5</sub>	2.5		
	NO <sub>x</sub>	100		
	CO	84		
	VOC	5.5		
Abrasive Blasting	PM	0.69	Lb / 1000 lb abrasive used	Facility data
	PM <sub>10</sub>			
	PM <sub>2.5</sub>			
Welding Operations (Main Manufacturing Building)	PM	0.0021	Lb / lb electrode used	Facility data (assuming 86% control)
	PM <sub>10</sub>			
	PM <sub>2.5</sub>			
Welding Operations (PDC Area)	PM	0.02	Lb / lb electrode used	Facility data (without control)
	PM <sub>10</sub>			
	PM <sub>2.5</sub>			
Non-emergency operation of the Emergency Generator (EG-1)	PM	0.46	Lb / hour of operation	EPA AP-42 Table 3.3-1 at 211 horsepower
	PM <sub>10</sub>	0.46		
	PM <sub>2.5</sub>	0.46		
	NO <sub>x</sub>	6.54		
	CO	1.41		

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
	VOC	0.52		
All	Greenhouse Gases	Use DEQ EZ Filer		

### 13.0 PROCESS/PRODUCTION RECORDS

Emissions device or activity	Process or production parameter	Frequency
Painting and Coating	Gallons, density, and VOC fraction	Daily for RACT if required or monthly for monthly VOC calculations
Painting and Coating	Gallons, density, and solid fraction	Monthly for PM/PM <sub>10</sub> /PM <sub>2.5</sub> calculations
Small Quantity Material Use	Gallons, density, and VOC fraction	Monthly or short period for monthly calculations
Natural Gas Combustion Sources	MMcf of natural gas combusted	Monthly
Abrasive Blasting	Pounds of abrasive used	Monthly
Welding Operations	Pounds electrode used	Monthly
Non-emergency operation of the Emergency Generator (EG-1)	Hours of non-emergency operation	Monthly

## 14.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O <sub>2</sub>	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31 <sup>st</sup>	O&M	operation and maintenance
CAO	Cleaner Air Oregon	Pb	lead
CFR	Code of Federal Regulations	PCD	pollution control device
CO	carbon monoxide	PM	particulate matter
CO <sub>2e</sub>	carbon dioxide equivalent	PM <sub>10</sub>	particulate matter less than 10 microns in size
DEQ	Oregon Department of Environmental Quality	PM <sub>2.5</sub>	particulate matter less than 2.5 microns in size
dscf	dry standard cubic foot	ppm	part per million
EPA	US Environmental Protection Agency	PSD	Prevention of Significant Deterioration
FCAA	Federal Clean Air Act	PSEL	Plant Site Emission Limit
Gal	gallon(s)	PTE	Potential to Emit
GHG	greenhouse gas	RACT	Reasonably Available Control Technology
gr/dscf	grains per dry standard cubic foot	scf	standard cubic foot
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SER	Significant Emission Rate
I&M	inspection and maintenance	SIC	Standard Industrial Code
lb	pound(s)	SIP	State Implementation Plan
MMBtu	million British thermal units	SO <sub>2</sub>	sulfur dioxide
NA	not applicable	Special Control Area	as defined in OAR 340-204-0070
NESHAP	National Emissions Standards for Hazardous Air Pollutants	TACT	Typically Achievable Control Technology
NO <sub>x</sub>	nitrogen oxides	VE	visible emissions
NSPS	New Source Performance Standard	VOC	volatile organic compound
NSR	New Source Review	year	A period consisting of any 12-consecutive calendar months



State of Oregon  
Department of  
Environmental  
Quality

## STANDARD AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Cascade Corporation  
2201 NE 201<sup>st</sup> Ave  
Fairview, OR 97024

### Source Information:

SIC	3537
NAICS	333924

Source Categories (Table 1 Part, code)	Part B, #78 Part C, #3
Public Notice Category	II

### Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	

Source test	
COMS	
CEMS	
Ambient monitoring	

### Reporting Requirements

Annual report (Feb 15)	X
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	
Other (specify)	

### Air Programs

Synthetic Minor (SM)	
SM -80	
NSPS	
NESHAP (list subparts)	<i>ZZZZ</i>
CAO	
NSR	

PSD	
GHG	
RACT	X
TACT	
Other (specify)	

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## PERMITTING

### PERMITTEE IDENTIFICATION

1. Cascade Corporation is located in Fairview, Oregon at 2201 NE 201st Avenue.

### PERMITTING ACTION

2. The proposed permit is a renewal of an existing Standard Air Contaminant Discharge Permit (ACDP) that was issued on 10/10/2007 and was originally scheduled to expire on 6/1/2012. The permittee is on a Standard permit because the permittee wishes to maintain their baseline emission rate and the permittee is subject to surface coating in manufacturing RACT under OAR 340 Division 232. The existing ACDP remains in effect until final action is been taken on the renewal application because the permittee submitted a timely and complete application for renewal.

### OTHER PERMITS

3. Other permit issued or required by the DEQ for this source include: WQ permit No. 11126 for Stormwater GEN12Z (file #: 100491).
4. Two underground storage tanks were removed in 1989, LUST ID: 6614. Soil Vapor Extraction was employed to cleanup solvents, ECSI Site ID: 635. Site was closed in 2014 and Notice of Completion issued 1/15/2015.

### ATTAINMENT STATUS

5. The source is located in a maintenance area for ozone and carbon monoxide. The area is in attainment for all other criteria pollutants. The facility's emissions of particulate matter (PM/PM10/PM2.5), CO, NOx, and sulfur dioxide (SO2) are negligible.
6. The source is not located within 10 kilometers of a Class I Air Quality Protection Area.

## SOURCE DESCRIPTION

### OVERVIEW

7. The permittee operates a main manufacturing building producing hydraulic lift truck attachments and a Process Development Center (PDC) with engineering design and prototyping capabilities. The processes in the main manufacturing building include welding, machining, parts washing, shot blasting, painting and assembly. The PDC is used for engineering offices and testing of prototype product including: welding, machining and assembly of tools and fixtures plus hydraulic/mechanical operations testing. The facility operations began in 1955.

8. Minor changes have been made to the facility since the last permit renewal. The two Small Paint Booths, M4 and M5, have been decommissioned. An emergency generator (diesel, 211 maximum bhp) was installed in 1997 ~ 1998 to supply emergency electrical power to the PDC offices and computer systems only.

#### PROCESS AND CONTROL DEVICES

9. Existing air contaminant sources at the facility consist of the following:

Device/ Process ID	Device/Process Description	Construction / Installation Date	Mfr./Model	Pollution Control Device Description	Construction / Installation Date
1B	Spray Booth	1996	Binks	Binks filters	1996
2B	Spray Booth	1997	Binks	Binks filters	1997
M3	Small Paint Booth	Pre-1990	unknown	Dry Filters	Pre-1990
BH-1	Pangborn Rotoblast	Pre-1990	Pangborn	Baghouse	1982
Welding	Welding Operations	1955	Various	Dust collectors	1955
Grinding	Grinding Operations	1955	Various	Dust collectors	1955
WE-1	Samco Water Evaporator	Pre-1990	Samco	None	NA
EG-1	Kohler Emergency Generator Model 135 Diesel	1998	Kohler	None	NA

#### COMPLIANCE HISTORY

10. The facility was inspected on 10/31/2018 and found to be in compliance with all permit conditions.
11. During the prior permit period there were no complaints recorded for this facility.
12. No enforcement actions have been taken against this source since the last permit renewal.

**EMISSIONS**

## 13. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
PM	0	0	0	-	24	24
PM <sub>10</sub>	0	0	0	-	14	14
PM <sub>2.5</sub>	NA	0	0	-	9	9
NO <sub>x</sub>	0	0	0	-	39	39
CO	0	0	0	-	99	99
VOC	15	15	15	54	54	0
GHG (CO <sub>2e</sub> )	0	0	0	-	74,000	74,000

- a. The VOC baseline emission rate for was established in previous permitting actions and there is no new information that affects the previous determination.
- b. For Standard ACDPs, the netting basis is equal to the baseline emission rate minus emission reductions required by rule plus emission increases approved in accordance with OAR 340, division 224 (NSR rules). [Refer to the definition of netting basis in OAR 340-222-0046.]
- c. The previous PSEL is the PSEL in the last permit issued in 2007.
- d. The capacity to emit PM, PM<sub>10</sub> and PM<sub>2.5</sub> is estimated to be 3.83 tons/year. Because this is at or above the de minimis level of 1 ton/year but below the generic PSEL levels, PSELs for PM, PM<sub>10</sub> and PM<sub>2.5</sub> have been set at the generic PSEL levels (24 tons/year, 14 tons/year, and 9 tons/year respectively). This does not represent emission increases.
- e. The capacity to emit SO<sub>2</sub> is estimated to be 0.16 tons/year. Because this is below the de minimis level of 1 ton/year, a PSEL for SO<sub>2</sub> is not set.
- f. The capacity to emit NO<sub>x</sub> is estimated to be 11.18 tons/year. Because this is at or above the de minimis level of 1 ton/year but below the generic PSEL levels, the NO<sub>x</sub> PSEL has been set at the 39 tons/year generic PSEL level. This does not represent emission increases.
- g. The capacity to emit CO is estimated to be 8.42 tons/year. Because this is at or above the de minimis level of 1 ton/year but below the generic PSEL levels, the CO PSEL has been set at the 99 tons/year generic PSEL level. This does not represent emission increases.

- h. No PSELS for HAPs were added. PSELS for HAPs are only created if requested by the source, for example in order to create an enforceable limit below major source levels (10 tons/year of an individual HAP, or 25 tons/year of combined HAPs. [OAR 340-222-0060] The maximum PTE for any individual Hazardous Air Pollutant (HAP) was estimated to be 0.75 tons/year, and the PTE for all HAPs combined was estimated to be 1.83 tons/year.
- i. The PTE for GHGs at this facility was calculated as 11,693 short tons of CO<sub>2</sub> equivalent per year. This is less than the generic PSEL level of 74,000 tons CO<sub>2e</sub>/year, so the GHG PSEL has been set at the generic PSEL level. [OAR 340-200-0020(72)(a)] This does not represent emission increases.
- j. The PSEL is a federally enforceable limit on the potential to emit.

#### HISTORY OF ORIGINAL PLANT BASELINE

- 14. The operating schedule for plant boiler in the baseline year 1977 was 16 hrs/day x 5 days/wk x 50 wks/yr = 4000 hrs/yr.
- 15. The estimated amount of Bunker-C oil (TT-6175) burned during the baseline year 1977 was 18,000 gallons. The boiler was taken out of service in 1988.
- 16. Cascade had a baseline emission rate of 18.8 tons VOC/yr. The surface coating RACT rules (formerly OAR 340-22-0170) required Cascade to reduce their coating line emissions from 9.7 tons/yr to 5.8 tons/yr, a reduction of 3.9 tons. The remaining baseline (non-coating line) VOC emissions that were not subject to the RACT rules equal to 9.1 tons/yr. Combined, the adjusted baseline is 14.9 tons/yr.

#### SIGNIFICANT EMISSION RATE ANALYSIS

- 17. For each pollutant, the proposed Plant Site Emission Limit is less than the sum of the Netting Basis and the significant emission rate, thus no further air quality analysis is required at this time.

#### **TITLE V MAJOR SOURCE APPLICABILITY**

- 18. A major source is a facility that has the potential to emit 100 tons/year or more of any criteria pollutant or 10 tons/year or more of any single HAP or 25 tons/year or more of combined HAPs. This facility is not a major source of emissions.

## CRITERIA POLLUTANTS

19. This facility is not a major source of criteria pollutant emissions.
  - a. Permittee estimated the maximum VOC emission is 14.99 tons; however, actual emissions from last 5 years have been less than 2 tons VOC per year.
  - b. The process includes associated small dryers and heaters. Permittee has calculated NO<sub>x</sub> and CO emissions from natural gas combustion in all dryers and heaters (23.1 MMBtu/hr total) at 9.63 and 8.09 tons/yr, respectively, based on 8,760 hours of operation, and estimated maximum GHG emissions at 11,693 tons/yr.
  - c. The facility's PTE for SO<sub>2</sub> is less than a ton (0.16) tons.
  - d. PM from welding operations is in an enclosed area and can emit up to 1.29 tons per year PM/PM<sub>10</sub>/PM<sub>2.5</sub>.
  - e. The source's potential to emit other pollutant is less than a ton a year.

## HAZARDOUS AIR POLLUTANTS/TOXIC AIR CONTAMINANTS

20. Under the Cleaner Air Oregon program, only existing sources that have been notified by DEQ and new sources are required to perform risk assessments. This source has not been notified by DEQ and is therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants.
21. DEQ required reporting of approximately 600 toxic air contaminants in 2016. DEQ regulates approximately 260 of those toxic air contaminants because they have Risk Based Concentrations established in rule, meaning those toxic air contaminants must be included in any risk assessment. The emissions of toxic air contaminants that do not have Risk Based Concentrations are required for reporting purposes only. The Cleaner Air Oregon Toxics Air Contaminant emissions inventory for this source can be found on this website <https://www.deq.state.or.us/aq/aqpermitsonline/SearchFilter.asp>.
22. All 187 hazardous air pollutants are on the list of toxic air contaminants. The hazardous air pollutants and toxic air contaminants listed below were reported by the source in a 2016 toxics emissions inventory and verified by DEQ. After the source is notified by DEQ, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.
23. This source is not a major source of hazardous air pollutants. Provided below is a summary of the HAP and toxic air contaminant emissions.

Hazardous Air Pollutant	Potential to Emit (tons/year)
Glycol Ether	0.75
Xylenes	0.62
Hexane	0.21
Total HAPs	1.83

## TOXICS RELEASE INVENTORY

24. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which DEQ has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, [chemicals covered by the TRI Program](#) are those that cause:
  - a. Cancer or other chronic human health effects;
  - b. Significant adverse acute human health effects; or
  - c. Significant adverse environmental effects.
25. There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.
26. Cascade reported the release of 120 lbs. of manganese in TRI-listed chemicals for the year 2018.
27. DEQ has copied this information from EPA's TRI website and does not guarantee the accuracy of this information.

## ADDITIONAL REQUIREMENTS

### NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

28. 40 CFR Part 60, Subpart IIII for compression ignition reciprocating internal combustion engines is not applicable to the source because the diesel emergency generator (211 maximum bhp, installed 1997 ~ 1998) was constructed before 2005 and manufactured before 2006.

### NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS APPLICABILITY

29. 40 CFR Part 63, Subpart ZZZZ is applicable to the source because it has a RICE engine. It is a diesel generator set manufactured by Kohler Power System. The maximum rated power is 211 bhp and it was installed in 1997 – 1998.
30. 40 CFR Part 63, Subpart XXXXXX – Area Source NESHAP for Nine Metal Fabrication and Finishing Facilities is not applicable to the source because the facility's SIC and NAICS codes are not one of the code categories listed in the applicability table for the rule. This means the facility is not primarily engaged in operations in one of the nine metal fabrication and finishing source categories listed in the rule.

31. 40 CFR Part 63, Subpart HHHHHH – Area Source NESHAP for Miscellaneous Surface Coating is not applicable to the source because the target metal HAPs identified in the rule are not contained in coatings used by the permittee in sufficient concentration level (0.1% by mass for cadmium, chromium, lead, and nickel, and 1% by mass for manganese). Should the facility use coatings with any of these HAPs at the facility in the future in a sufficient concentration level, it will immediately become subject to Subpart 6-H requirements.

#### GREENHOUSE GAS REPORTING APPLICABILITY

32. The source is not subject to greenhouse gas reporting under division 215 because actual greenhouse gas emissions are less than 2,500 metric tons (2,756 short tons) of CO<sub>2</sub> equivalents per year. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

#### REASONABLY AVAILABLE CONTROL TECHNOLOGY APPLICABILITY

The facility is located in the Portland AQMA and the following RACT requirements apply:

33. Spray booth 1B and 2B: VOC emissions from the air dried coating of metal parts are required to meet 3.5 lb VOC/gal, excluding water, under 340-232-160. When the temperature of the oven is 194°F and below, the coated metal part is considered air dried and the coating material must meet the 3.5 lb VOC/gal RACT standard using a daily average.

VOC emissions from the oven dried surface coating of metal parts are required to meet the 3.0 lb VOC/gal RACT limits of OAR 340-232-160. When the temperature of the oven is greater than 194°F the coated metal part is oven dried and the coating material must meet the 3.0 lb VOC/gal RACT standards using a daily average.

34. Small Quantity Material Use: Federal guidance in Appendix D – “Approvable Averaging Times for VOC Trades”/Federal Register Vol. 51 No. 233/December 4, 1986, acknowledges that daily averaging may not be feasible in all cases. When it is not technically feasible to determine VOC emissions on a daily basis, longer averaging periods may be considered. In the case of the small quantity material use, Cascade meets this criteria because it is not technically feasible to determine the small quantity of material use on a daily basis.

The compliance with RACT for the small quantity material use, such as, aerosol cans, slip plate coating, ink roll on coating, and the spray booth M3 is monitored on a monthly basis and averaged to demonstrate compliance with the 3.5 lb VOC/gal RACT limit on a daily basis.

The above referenced Federal guidelines set forth the following criteria:

- a. Real reductions in actual emissions must be achieved, consistent with RACT. Cascade Corporation will balance the use of compliant and non-compliant coatings to comply with the RACT limit on a daily basis as required by the permit.

The coating material which is used in small quantity will be monitored on a monthly basis and still be required to meet the daily RACT limits.

- b. The averaging period must be as short as practicable and in no case longer than 30 days. The proposed averaging is 30 days for small quantity material. The quantity of material can be tracked more accurately on a monthly basis.
- c. A demonstration must be made that the use of long-term averaging will not jeopardize either ambient standards, attainment or the reasonable further progress plan for the area. The monthly monitoring will only be used in calculating the daily RACT limits for the small quantity material. The facility is still required to stay within the 3.5 lb VOC/gal RACT limit for this small quantity material, therefore the monthly monitoring will not result in greater emissions to the atmosphere.

### **TYPICALLY ACHIEVABLE CONTROL TECHNOLOGY APPLICABILITY**

35. The source is likely meeting OAR 340-226-0130 Highest and Best Practicable Treatment and Control: Typically Achievable Control Technology (TACT) by:
  - a. Conducting pollution control activities such as stationary and portable welding fume controls,
  - b. Using automated coating application for small parts.

### **SOURCE TESTING**

36. There are no source testing requirements for this facility.

### **PUBLIC NOTICE**

37. Pursuant to OAR 340-216-0066(4)(a)(A), issuance of Standard Air Contaminant Discharge Permits requires public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on 9/23/20 and the comment period will end on 10/23/20.**

GBD:WL

**ATTACHMENT A – DETAIL SHEETS**

Cascade Corporation						
Potential to Emit (PTE) Summary						
Pollutant	Coating PTE (tons/year)	Combustion PTE (tons/year)	Abrasive Blasting PTE (tons/year)	Welding PTE (tons/year)	E. Gen PTE (tons/year)	PTE Total
PM/PM10/PM2.5	1.69	0.73	0.01	1.29	0.11	<b>3.83</b>
Nitrogen Oxides (NOx)		9.63			1.55	<b>11.18</b>
Carbon Monoxide (CO)		8.09			0.33	<b>8.42</b>
Sulfur Dioxide (SO2)		0.06			0.10	<b>0.16</b>
Volatile Organic Compounds (VOC)	13.80	1.06			0.13	<b>14.99</b>
Total GHG Emissions (CO2e)		11,693				<b>11,693</b>
<b>Total HAPs</b>						<b>1.83</b>
<b>Single HAPs</b>						
Glycol Ether	7.50E-01					<b>0.75</b>
Xylenes	6.20E-01				1.00E-04	<b>0.62</b>
Hexane	3.70E-02	1.70E-01				<b>0.21</b>
Ethylbenzene	9.80E-02					<b>0.10</b>
Triethylamine	8.50E-02					<b>0.09</b>
Toluene	3.50E-02	3.30E-04			1.40E-04	<b>0.04</b>
Manganese		3.70E-05	5.40E-06	2.00E-02		<b>0.02</b>
Formaldehyde		7.00E-03			4.10E-04	<b>0.01</b>
Nickel Compounds	5.00E-03					<b>0.01</b>