

# Public Notice - Request for Comments

## Proposed renewal of Air Quality Permit for BioOregon Protein, Inc.

The purpose of this notice is to invite you to provide written comments on this proposed air quality permit renewal.

### DEQ's Role:

The Oregon Department of Environmental Quality (DEQ) is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, and for managing the proper disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities. DEQ issues permits to regulate the type and amount of air emissions at a regulated facility.

### Comments due:

Written comments due: 5 p.m., August 9, 2010

### Where can I send my comments?

Catherine Blaine, Permit Coordinator  
(503) 229-5582 or (800) 452-4011  
2020 SW Avenue, Suite 400  
Portland, Oregon 97201  
Fax (503) 229-6945  
[nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

### Where can I get technical information?

Tina Leppaluoto, Permit Writer  
(503) 667-8414 x55020 or (800) 452-4011  
1550 NW Eastman Parkway, Suite 290  
Gresham, Oregon 97030  
Fax (503) 674-5148  
[leppaluoto.tina@deq.state.or.us](mailto:leppaluoto.tina@deq.state.or.us)

### Where can I get background information?

Information about this project is viewable online by clicking the following link(s):

[Draft Permit](#)

[Draft Review Report](#)

You can review hard copies of the draft permit and related documents at the Warrenton Community Library located at 225 S Main Avenue, Warrenton, Oregon 97146, (503) 861-3919. The draft permit, draft review report and application can be seen at DEQ's Northwest Region office. Located at 2020 SW 4<sup>th</sup> Avenue, Suite 400, Portland, Oregon, 97201. For a review appointment, call Susan Curry at (503) 229-6736.

### What is proposed?

DEQ proposes to renew an air permit for BioOregon Protein, Inc. (permit #04-0006) and is inviting public comment on the proposed permitting action. During the comment period the public is invited to make comments related to specific conditions within the proposed permit.

The permittee is not proposing changes to the emission limits in the renewal permit. However, the permittee has made significant changes to its facility, products and markets into which it sells its products. These changes have resulted in reduced emissions.

### Permit expiration

Oregon law requires facilities with a Simple Air Contaminant Discharge Permit to renew that permit every five years. Upon renewal, this permit will be effective for five years, expiring on 06/01/2015.

### Who is the applicant?

BioOregon Protein, Inc.  
PO Box 419  
Warrenton, Oregon 97146

### Where is the facility located?

BioOregon Protein, Inc.  
1935 NW Warrenton Drive  
Warrenton, Oregon 97146

### Who might have an interest?

People who work, live, and recreate in the area.

### What does BioOregon Protein, Inc. do that affects air quality?

BioOregon Protein, Inc. operates a fish products manufacturing facility which releases (Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NO<sub>x</sub>), Volatile Organic Compounds (VOC), to the air.

### What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216-0020 Part B give DEQ the authority to issue permits for fish processing facilities. OAR Chapter 340 Divisions 200 through 268 contains all pertinent rules that govern the air quality program.



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### Northwest Region Air Quality

1550 NW Eastman Parkway,  
Suite 290  
Gresham, OR 97030  
Phone: (503) 667-8414  
x55020  
(800) 452-4011  
Fax: (503) 674-5148  
Contact: Tina Leppaluoto,  
Permit Writer  
E-mail:  
[leppaluoto.tina.l@deq.state.or.us](mailto:leppaluoto.tina.l@deq.state.or.us)  
us

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

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[subscriptions@deq.state.or.us](mailto:subscriptions@deq.state.or.us)

Please include your full name, e-mail address and mailing address so that we can purge you from our print mailing list, thus saving trees and taxpayer dollars.

Notice Issued: 06/30/10  
By: Catherine Blaine

### **How does DEQ determine what requirements go in the permit?**

Various federal and state regulations apply to a facility depending on the type of industry, the type and amount of pollutants emitted, and the location of the facility. All applicable regulations must be contained in the permit, including the appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

### **Meeting air quality standards**

Air quality in Warrenton geographical area meets the National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (EPA) to protect public health. DEQ has determined that the air emissions from BioOregon Protein, Inc. will not result in a violation of those standards. DEQ is responsible for establishing permit emissions limits that ensure air quality standards are not violated.

### **What pollutants are considered in determining permitted limits?**

EPA and DEQ use six key pollutants as indicators of air quality. These are known as "criteria pollutants" and are compounds that, if inhaled in sufficient quantity and for sufficient duration, may lead to health effects that generally aggravate cardiovascular and respiratory disease. If the amount of criteria pollutants emitted is greater than a regulated minimum, then emission limits are established.

Hazardous air pollutants (HAPs) are compounds that, if inhaled in sufficient quantity and for sufficient duration, may pose a threat of adverse human health or environmental effects, including, for example, acute or chronic toxicity, cancer, birth defects, or reproductive dysfunction. The mere presence of these pollutants in the air does not necessarily mean that a health risk exists. EPA has established a list of 187 compounds that are classified and regulated as HAPs. If the amount of HAPs released is greater than a regulated minimum level, then additional requirements may also apply. HAP emissions from Bio-Oregon Protein are considered negligible.

For more information about criteria pollutants, go to:

<http://www.deq.state.or.us/aq/forms/annrpt.htm>

For more information about hazardous air pollutants, go to:

[www.epa.gov/ttn/atw/hlthef/hapindex.html](http://www.epa.gov/ttn/atw/hlthef/hapindex.html)

### **How are the permitted substances measured?**

The permittee must determine compliance with the annual plant site emission limit by monitoring monthly production and calculating each 12 month rolling total. The permittee must retain records for all parameters used to determine compliance for at least two years.

### **Emissions and permit limits**

Table 1 below presents the maximum allowable emissions for the facility. The Current Emission Limit reflects the maximum amount of emissions the facility can currently emit under their existing permit. The Proposed Emission Limit reflects the maximum amount of emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than the maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

### **Compliance history:**

The facility was inspected on 6/30/2009 and found to be in compliance with the permit conditions. During the last two years the permittee has received odor complaints concerning the plant operations. The permittee has done significant changes to the plant operations to reduce the odors and to mitigate the number of complaints. No enforcement actions have been taken against the facility.

### **What are the special conditions of this permit?**

Odor Mitigation - The permittee must take reasonable precautions to minimize fugitive odorous emissions. Such reasonable precautions include; the plant facilities and premises shall be kept clean and free of waste fish material, exposed products, or semi-processed materials as much as practicable. Outside storage of all raw feed materials is prohibited. This also includes what is referred to as the "bone truck" which is used to remove the fish bone material offsite. Equipment, facilities and building interiors that come in contact with raw or partially processed material must be washed down at least once each working day with steam or hot water and detergent/disinfectant. All solid waste must be stored in covered containers inside the facility until disposed of offsite. The bone truck will be stored and loaded in the vented room.

Work Practices - Total volatile nitrogen content of fish by-product raw materials accepted for processing must not exceed 55 mg N/100 g sample. Material not meeting this standard must be promptly disposed of in accordance with the O, T & M plan approved by the Department. Raw material receipts must be tested for total



volatile nitrogen at least twice weekly on separate days. Apart from the testing requirement above, each raw material receipt that is of suspect freshness quality at time of receipt must be tested for total volatile nitrogen content.

**What other DEQ permits are required?**

Other permits issued or required by the Department of Environmental Quality for this source include a NPDES 101804 water discharge permit.

**What other sources of air pollutants are in the vicinity of the facility?**

Various sources emit similar air pollutants. EPA and DEQ split up the sources into 3 categories: point, area, and mobile sources. Point sources are primarily large industrial facilities. Area sources are smaller than point sources and include backyard burning, woodstoves, consumer products, gasoline stations, etc. Mobile sources include cars, trucks, airplanes, ships, railroads, and construction equipment.

**What happens next?**

DEQ will schedule a public hearing if one is requested by 10 or more people, or by an authorized person representing an organization

of at least 10 people. An additional 30 day public notice will be published to advertise the public hearing.

If a public hearing is not requested, DEQ will consider and provide responses to all comments received at the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. . Ultimately, if a facility meets all legal requirements, DEQ will issue the facility’s air quality permit

**Accessibility information**

DEQ is committed to accommodating people with disabilities. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format. To make these arrangements, contact DEQ Communications & Outreach (503) 229-5696 or toll free in Oregon at (800) 452-4011; fax to (503) 229-6762; or e-mail to [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us) .

People with hearing impairments may call DEQ’s OTRS 1-800-735-2900.

**Table 1**

<b>Criteria Pollutant</b>	<b>Current Limit (tons/yr)</b>	<b>Proposed Limit (tons/yr)</b>
Particulate Matter (PM/PM <sub>10</sub> )	(14)	(14)
Nitrogen Oxides (NO <sub>x</sub> )	(39)	(39)
Volatile Organic Compounds (VOC)	(39)	(39)

