

# Public Notice - Request for Comments

## PECO Aerospace Fasteners Proposed Air Quality Permit

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

### 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. Under Oregon law, DEQ has no authority over land use issues and cannot affect the siting of any facility.

### Comments due:

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

### Where can I send my comments?

Catherine Blaine, AQ Permit Coordinator  
(503) 229-5554 or 1-800-452-4011  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201  
Fax: (503) 229-6945  
[nwraqpermits@deq.state.or.us](mailto:nwraqpermits@deq.state.or.us)

### Where can I get technical information?

Kathy Amidon, Permit Writer  
(503) 667-8414, ext. 55010  
1550 NW Eastman Parkway, Suite 290  
Gresham, OR 97030  
Fax: (503) 674-5148  
[amidon.kathy@deq.state.or.us](mailto:amidon.kathy@deq.state.or.us)

### How can I review documents?

You can review electronic versions of the draft permit, review report and application in the online version by clicking on the links below:

[Draft Permit](#)

[Draft Review Report](#)

You can review hard copies of the draft permit and related documents at the Canby City Library located at 292 N. Holly, Canby, Oregon. The draft permit, draft review report and application can be seen at the 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 PECO Aerospace Fasteners 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.

### Permit expiration:

Oregon law requires facilities with a Simple Air Contaminant Discharge Permit to renew that permit every five years. When issued, this permit will be effective for five years, expiring on 4/1/2015.

### Who is the applicant?

PECO Aerospace Fasteners  
4720 SE 17<sup>th</sup> Avenue  
Portland, OR 97282

### Where is the facility located?

361 S. Sequoia Pkwy  
Canby, OR 97013

### What is the permit number?

03-9516-SI-01

### Who might have an interest?

People who work, live, and recreate near the plant site.

### What does the facility do that affects air quality?

PECO proposes to manufacture fasteners of various sizes for the aerospace industry. The process includes coating the fasteners for corrosion protection. The fasteners will be coated with cadmium, nickel, and some will be treated in a chromium conversion tank. Identifying marks will be painted on the manufactured parts. Natural gas fired curing ovens and small space heaters are included in the facility.

### What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216 and 218 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200 through 268 contains all pertinent rules that govern the air quality program.



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Notice Issued: 06/23/2010  
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 the Portland metro 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 Peco Aerospace Fasteners 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, 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, 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.

For more information about criteria pollutants, go to:

[www.deq.state.or.us/aq/forms/2005ar/2005ar.pdf](http://www.deq.state.or.us/aq/forms/2005ar/2005ar.pdf)

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?**

Emissions are calculated using a mass balance method.

### **Emissions and permit limits**

Table 1 below presents the maximum allowable emissions for the facility. 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.

The proposed facility does not have the potential to be a major source of HAPs.

### **Compliance history:**

The facility will be inspected by Department staff to ensure compliance with permit conditions.

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

The facility is subject to regulation as an area source of hazardous air pollutants associated with plating and polishing operations. The permit includes notification requirements, operating standards, and reporting requirements to ensure compliance. The permit also contains a limit on the amount of VOC emitted from paint as applied to metal parts.

### **What other DEQ permits are required?**

No other DEQ permits are required. The applicant may need to register as a hazardous waste generator in the future.

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

There are no other facilities in the immediate area that have an air discharge permit.

EPA and DEQ split up the sources into three 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 other information about this company is related to this permit?**

The company also operates a facility that manufactures and coats die-cast aluminum parts in Portland.



**What happens next?**

After the comment period closes, DEQ will consider and provide responses to all comments received. DEQ may modify provisions in the proposed permit, but the permit writer can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. 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 at our hearings. 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 number 1-800-735-2900.

**Table 1**

<b>Criteria Pollutant</b>	<b>Proposed Limit <u>(tons/yr)</u></b>	<b>Estimated Actuals <u>(tons/yr)</u></b>
Volatile Organic Compounds(VOC)	39	4