

Public Notice - Request for Comments

Proposed Air Quality Permit for Kraft Foods Global, Inc.

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 11, 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: 229-4569
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

How can I review documents?

You can review electronic versions of the draft permit and review report in the online version of this document located at:

[Draft Permit](#)

[Draft Review Report](#)

You can review hard copies of the draft permit and related documents at the North Portland Library located at 512 N. Killingsworth Street, Portland, OR. The draft permit, review report, and application can be seen at DEQ's Northwest Region Office, located at 2020 @W 4th Ave., Suite 400, Portland, OR. 97201. For a review appointment, call Susan Curry at (503) 229-6736.

What is proposed?

DEQ proposes to renew an air permit for Kraft 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 5/1/2015.

Who is the applicant?

Kraft Foods Global, Inc.
Nabisco Bakery
100 NE Columbia Blvd.
Portland, OR 97211

What is the permit number?

26-2968-ST-01

Who might have an interest?

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

What does the District do that affects air quality?

Kraft operates a commercial bakery. The baking of various doughs produces VOC. Combustion of natural gas produces NO_x and CO and a small amount of SO₂. Combustion of fuel oil in the large boiler (back-up fuel) produces these same pollutants.

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.

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.



State of Oregon
Department of
Environmental
Quality

Northwest Region
Air Quality
2020 SW Fourth Avenue
Portland, OR 97201
Phone: (503) 229-5554
(800) 452-4011
Fax: (503) 229-6945

www.oregon.gov/DEQ

Notice Issued: 07/09/2010
By: Catherine Blaine

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 the source 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

For more information about hazardous air pollutants, go to:

www.epa.gov/ttn/atw/hlthef/hapindex.html

How are the permitted substances measured?

Emissions from fuel combustion are calculated using established emission factors. Specific emission factors for different dough types have been calculated. For any new dough type, a specific emission factor must be calculated.

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. In addition, EPA has determined that these types of sources do not warrant regulation for HAPs.

Compliance history:

The facility was inspected on 9/15/08 and found to be out of compliance with record keeping and reporting requirements for a new, large boiler. A Warning Letter was issued. Kraft submitted the necessary report and made changes to the daily log to ensure that record keeping would be done properly in the future. No further action was deemed necessary. No complaints have been taken against this source since the last permit renewal.

What are the special conditions of this permit?

The Miura boiler, rated at 11.8 MM Btu/hr, is subject to New Source Performance Standards. Fuel usage must be monitored and a semi-annual report submitted.

What other DEQ permits are required?

This facility also has a storm water discharge permit.

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

Located in the same area are a ready-mix plant, a tire retreading operation, a chrome plater, and a crematorium.

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 operates no other facilities in the area.

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.

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.

Accessibility information

DEQ is committed to accommodating people with disabilities at our hearings. Please notify

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

Criteria Pollutant	Proposed Limit (tons/yr)	Estimated Actuals (tons/yr)
Volatile Organic Compounds(VOC)	39	10
Sulfur Dioxide (SO ₂)	39	<1
Carbon Monoxide (CO)	99	3
Nitrogen Oxides (NO _x)	39	11

