

# Public Notice-Request for Comments

## Proposed renewal of Air Quality Permits for Four Fiberglass Facilities: Miles Fiberglass, Oregon City; Miles Fiberglass, Happy Valley; Shaw's Fiberglass, Damascus; and S.R. Smith, Canby



State of Oregon  
Department of  
Environmental  
Quality

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

### 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 23, 2010

### Where can I send my comments?

Catherine Blaine, Permit Coordinator  
(503) 229-5582 or 1-800-452-4011  
2020 SW Fourth Avenue, Suite 400  
Portland, Oregon 97201  
Fax: 503-229-6945 Phone: 503-229-5582  
E-Mail: [NWRAQPermits@deq.state.or.us](mailto:NWRAQPermits@deq.state.or.us)

### Where can I get technical information?

Dave Kauth, Environmental Engineer  
503-667-8414 ext. 55003 or 1-800-452-4011  
1550 NW Eastman Parkway, Suite 290  
Gresham, OR 97030  
Fax: 503674-5148  
Email: [kauth.dave@deq.state.or.us](mailto:kauth.dave@deq.state.or.us)

### Where can I get more information?

Information about these projects are viewable online by clicking the following link(s):

#### Miles Fiberglass and Plastics, Inc.

##### Otty Road Facility:

[Draft Permit](#)  
[Draft Review Report](#)  
[Data Sheet](#)

#### Miles Fiberglass and Plastics, Inc.

##### Oregon City Facility:

[Draft Permit](#)  
[Draft Review Report](#)  
[Data Sheet](#)

#### Shaw's Fiberglass and Plastics, Inc.

[Draft Permit](#)  
[Draft Review Report](#)  
[Data Sheet](#)

#### S.R. Smith, LLC

[Draft Permit](#)  
[Draft Review Report](#)  
[Data Sheet](#)

You can review hard copies of the draft permits and review reports at the following libraries: S.R. Smith draft permit information is available at Canby Public Library, 292 N Holly Street, Canby, Oregon.

Miles Fiberglass and Plastics, Inc. (Otty Road facility) and Shaw's Fiberglass and Plastics draft permit information can be viewed at the Clackamas Corner Library, 11750 SE 82<sup>nd</sup> Avenue, Suite D (northeast corner of the Clackamas Town Center complex), Portland, OR Miles Fiberglass and Plastics, Inc. (Oregon City facility) is available at the Oregon City Public Library, 362 Warner Milne Road, Oregon City, OR.

The draft permits, draft review reports and the applications are available for viewing at the DEQ Northwest Region Office, located at 2020 SW Fourth Avenue, Portland, 4th floor. For a review appointment, call Susan Curry 503-229-6736.

### What is proposed?

DEQ proposes to renew the air permits for the four facilities identified above and is inviting public comment on the proposed permitting action. During the comment period the public is

### Northwest Region Air Quality

2020 SW Fourth Avenue  
Portland, OR 97201

Phone: (503) 229-5263  
(800) 452-4011

Fax: (503) 229-6945

Contact: George Davis

E-mail:

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

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

If you received a hard copy of this notice in the mail, please consider receiving updates via e-mail instead. Send your request to:  
[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.

Date: 07/15/2010

By: C. Blaine

invited to make comments related to specific conditions within the proposed permits.

DEQ is proposing only minor changes to all of these permits. The changes involve updating some of the general monitoring, recordkeeping and reporting conditions in the permits, as well as the General Conditions. No changes to the emission limits are proposed. The changes are described in the review reports for the permits.

### **Permit expiration**

Oregon law requires facilities with a Title V Permit to renew that permit every five years. Upon issuance, this permit will be effective for five years, expiring on August 1, 2016.

### **Who are the applicants?**

Miles Fiberglass (2 facilities), Shaw's Fiberglass, and S.R. Smith.

### **Where are the facilities located?**

Miles Fiberglass, 8855 SE Otty Rd, Happy Valley;  
Miles Fiberglass, 1516 Main St., Oregon City;  
Shaw's Fiberglass, 19402 SE Foster Rd, Damascus; and  
S.R. Smith, 1017 SW Berg Parkway, Canby

### **Who might have an interest?**

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

### **What do these facilities do that affects air quality?**

All four of these facilities manufacture products from fiberglass reinforced plastic resin, commonly known as fiberglass.

Fiberglass parts are manufactured from styrene resin reinforced with fiberglass strands. The styrene resin is a liquid which polymerizes and forms solid polystyrene plastic. Styrene is emitted during the production process.

### **What legal requirements apply?**

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 218 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200-268 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.

### **Meeting air quality standards**

Air quality in the Portland Metropolitan 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 these facilities 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:

<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?**

Permitted emissions are estimated using calculations specified in the permit.

### **Emissions and permit limits**

The proposed Plant Site Emission Limits (PSELs) for all four of these facilities are the same as the current PSELs.



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

All four of these facilities are major sources of HAPs. As major sources, they are all subject to the following National Emission Standards for Hazardous Air Pollutants (NESHAPs): Subpart WWW. In addition, Shaw's Fiberglass is subject to Subpart VVVV which applies to boat manufacturers. Table 2 summarizes the significant HAPs which the facilities emit. More detailed information can be found in the review report.

#### **Compliance history:**

S.R. Smith was issued a Warning Letter in August, 2007, for recordkeeping and reporting violations. These violations were corrected. The facility was inspected on 09/25/09 and found to be in compliance with all permit requirements.

Both Miles Fiberglass facilities and the Shaw's Fiberglass facility have had no enforcement actions since issuance of their current permits.

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

There are no special conditions in the permit.

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

Miles Fiberglass in Happy Valley is a Small Quantity Generator of hazardous waste, and has a Gen12Z Industrial Stormwater permit. Miles Fiberglass in Oregon City is a Small Quantity Generator of hazardous waste, and has a Gen12Z Industrial Stormwater permit. Shaw's Fiberglass in Damascus is a Small Quantity Generator of hazardous waste. S.R. Smith in Canby is a Small Quantity Generator of hazardous waste, and has a Gen12Z Industrial Stormwater permit.

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

There are many industrial and commercial facilities in the Portland Metropolitan Area that emit air pollutants.

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 for any of these permits if one is requested by 10 or more people, or by an authorized person representing an organization of at least 10 people. An additional 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. 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 following EPA review.

After the public comment period, DEQ will send the proposed permits to EPA. EPA will have 45 days to review the proposed permits and submit any objections to DEQ in writing. If EPA has no formal objections, any person may petition EPA with an objection during the following 60 days. A petition may only be based on objections already raised during the public comment period, unless the person submitting the petition can demonstrate it was impossible or impractical to do so, or that new information is now available to justify a new objection.

#### **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>
Miles Fiberglass, Happy Valley Volatile Organic Compounds (VOC)	46	46
Miles Fiberglass, Oregon City Volatile Organic Compounds (VOC)	39	39
Shaw's Fiberglass, Damascus Volatile Organic Compounds (VOC)	39	39
S.R. Smith, Canby Volatile Organic Compounds (VOC)	39	39

**Table 2**

<b>Hazardous Air Pollutants</b>	<b>Highest individual HAP (tons/yr)</b>	<b>Total HAPs (tons/yr)</b>
Miles Fiberglass, Happy Valley	styrene 45	46
Miles Fiberglass, Oregon City	styrene 37	39
Shaw's Fiberglass, Damascus	styrene 27	27
S.R. Smith, Canby	styrene 36	37