

Request for Comments

Proposed Renewal of Title V Air Operating Permit for Northwest Aluminum Specialties, Inc.



State of Oregon
Department of
Environmental
Quality

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., **Sept. 10, 2010**

Where can I send my comments?

Nancy Swofford, Permit Coordinator
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
(541) 633-2021 or 866-863-6668 (Toll Free)
Fax: (541) 388-8283
Email: [Nancy Swofford](mailto:Nancy.Swofford@deq.state.or.us)

Where can I get technical information?

Mark Fisher, Permit Writer
475 NE Bellevue Dr., Suite 110
Bend, OR 97701
(541) 633-2022 or 866-863-6668 (Toll Free)
Fax: (541) 388-8283
Email: [Mark Fisher](mailto:Mark.Fisher@deq.state.or.us)

Where can I get background information?

You can access electronic versions of the draft permit and review report by clicking on the links below:

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

You can review hard copies of the draft permit and related documents at The Dalles-Wasco County Public Library located at 722 Court Street and the DEQ office in Bend. For a review appointment, call Nancy Swofford at (541) 633-2021.

What is proposed?

DEQ proposes to renew the Title V Air Operating Permit for Northwest Aluminum Specialties, Inc. (NWAS) 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 proposing changes to the emission limits in the renewal permit.

The current Plant Site Emission Limit (PSEL) is being reduced to the Generic PSEL because the NWAS facility does not have the capacity to emit more than a significant emission rate for each pollutant. The fluoride PSEL is reduced to zero because fluoride is not used or emitted in the process.

Permit expiration

Oregon law requires facilities with a Title V Permit to renew that permit every five years. Upon renewal, this permit will be effective for five years, expiring in 2015.

Who is the applicant?

Northwest Aluminum Specialties, Inc.

Where is the facility located?

2929 West Second Street
The Dalles, OR 97058

The source is located within 200 kilometers of the Mount Hood and Mount Adams Wilderness Areas, which are Class I air quality protection areas. The source is also located in the Columbia River Gorge National Scenic Area.

Who might have an interest?

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

What does Northwest Aluminum Specialties, Inc. (NWAS) do that affects air quality?

Northwest Aluminum Specialties, Inc. releases Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NOx), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Hazardous Air Pollutants, etc. to the air.

Eastern Region Air Quality

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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: 08/06/2010
By: Nancy Swofford

What legal requirements apply?

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

The general provisions of subpart A of 40 CFR Part 63 apply to this source because it is subject to RRR for secondary aluminum production facilities.

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 Dalles 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 Northwest Aluminum Specialties, 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, 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:

[Air Quality Annual Report and Data Summaries](#)

For more information about hazardous air pollutants, go to:

[Health Effects Notebook for Hazardous Air pollutants \(US EPA\)](#)

How are the permitted substances measured?

This facility is required to keep annual records of the amount of: secondary aluminum produced; pre-processed aluminum used; aluminum fluxed; reactive flux used; fuels used by type; dross handled; painted scrap used; chips and shaving with cutting fluid residue used; hours of operation; and annual pollutant emissions calculated each month for each 12-consecutive month period.

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.

Northwest Aluminum Specialties, Inc. (NWS) is not a major source of HAPs. However, since the facility was co-located with the primary aluminum production facility, the entire source was considered a major source of HAPs when the MACT standard for secondary aluminum productions was promulgated.

Compliance history:

During the last permit term, the facility was inspected in August 2007 and September 2009. Two violations were identified during the inspection in 2007 and a Warning Letter was issued for failure to conduct testing on the shredder and missing or incorrect labels. NWS requested EPA waive the test requirement for the shredder and the labels for the process equipment have been updated. The facility was found to be in compliance with permit conditions during the inspection in 2009.

What other DEQ permits are required?

Other permits issued or required by the Department for this source include a NPDES permit #0001708.



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 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 permit to EPA. EPA will have 45 days to review the proposed permit 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 .

People with hearing impairments may call 711.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Particulate Matter (PM)	435	14
Small Particulate Matter (PM ₁₀)	435	14
Nitrogen Oxides (NO _x)	96	39
Sulfur Dioxide (SO ₂)	519	39
Carbon Monoxide (CO)	17413	99
Volatile Organic Compounds (VOC)	235	39
Flouride	98	0