

Request for Comments

Proposed renewal of Air Quality Permit for Pierce Pacific Manufacturing

The purpose of this notice is to invite you to provide written comments on a 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., February 6, 2012

Where can I get technical information or send my comments?

Kathy Amidon, Permit Writer
(503) 667-8414, ext. 55010
1550 NW Eastman Parkway, Suite 290
Gresham, OR 97030
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Where can I get background information?

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

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

You can review hard copies of the draft permit and related documents at the Rockwood library located at 17917 SE Stark Street and the DEQ office in Gresham. For a review appointment, call Kathy Amidon at (503) 667-8414, ext 55010.

What is proposed?

DEQ proposes to renew an air permit for the facility 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 any changes to the emission limits in the renewal permit.

Permit expiration

Oregon law requires facilities with a Simple Permit to renew that permit every five years. Upon renewal, this permit will be effective for five years, expiring on 2/1/2016.

What is the permit number?

26-0143-SI-01

Who is the applicant?

Pierce Pacific Manufacturing, Inc.

Where is the facility located?

4424 NE 158th Avenue
Portland, OR 97230

Who might have an interest?

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

What does the facility do that affects air quality?

The permittee manufactures material handling accessories for heavy-duty tractors, such as boom end devices. The parts are shaped and attached to the tractor base. Some parts are cleaned in a shot-blast booth and some are cleaned in a cold solvent bath prior to assembly. The assembled tractor is steam cleaned then spot cleaned with solvent by hand. A coat of primer and a topcoat are applied. A vapor injected catalyst system allows the use of lower VOC (Volatile Organic Compounds) coatings in the process. The coatings are allowed to air dry

Total VOC emissions in 2010 were 2.7 tons.

What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200 - 268 contain 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 appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.



State of Oregon
Department of
Environmental
Quality

Northwest Region Air Quality

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

Notice Issued: 01/04/12
By: pah

Meeting air quality standards

Air quality in the Tillamook area meets the National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (EPA) to protect public health. DEQ has determined the air emissions from the facility 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?

All criteria pollutants, as listed above, are considered when setting permit limits. A limit is set for each criteria pollutant and HAPs that are emitted above the de minimis level listed in OAR 340-200-0020, Table 4.

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.

The facility’s potential to emit HAPs: 5.8 tons toluene, 6.2 tons xylene, and one ton other HAPs for a total of 13 tons /year from paints and solvent usage. Actual emissions in 2010 were 105 pounds toluene and 649 pounds xylene.

For more information about criteria pollutants: <http://www.deq.state.or.us/aq/forms/annrpt.htm>

For more information about hazardous air pollutants: www.epa.gov/ttn/atw/hlthef/hapindex.html

How are permitted substances measured?

The facility uses a mass balance method to determine emissions.

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 the existing 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:

No complaints against the facility have been recorded by the Department. The facility was inspected in 2009 and found to be out of compliance with the permit condition requiring rolling 12-month calculations of emissions. Record keeping systems at the facility were changed and the facility was brought into compliance.

Are there special conditions of this permit?

The steel used to make the parts produced at the facility contains very small amounts of metal HAPs that are released during machining, welding, and dry abrasive operations. The US EPA has promulgated rules to ensure best work practices to minimize HAP emissions. DEQ has adopted the rule and included the work practices in the proposed permit.

VOC from coatings applied to metal surfaces are limited to 9 tons/year. The permittee must apply for a higher lever permit prior to exceeding this limit.

What other DEQ permits are required?

The facility has a general storm water permit.

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

A facility that manufactures polyurethane foam is located in the same small industrial area. It is also a source of VOC.

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 happens next?

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.

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 and Outreach in Portland at 503-229-5696 or call toll-free in Oregon at 800-452-4011; fax to 503-229-6762; or email deqinfo@deq.state.or.us.

People with hearing impairments may call 711.

Criteria Pollutant	Current Limit <u>(tons/yr)</u>	Proposed Limit <u>(tons/yr)</u>
Volatile Organic Compounds (VOC)	39	39

