

Request for Comments

Proposed Renewal of an Air Quality Permit for Wastequip Manufacturing Company LLC



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., February 13, 2012

Where can I send my comments?

Patty Hamman, Regional Permit Coordinator
(503) 378-5305 or Toll Free (800) 349-7677
750 Front Street NE, Suite 120
Salem, OR 97301-1039
(503) 378-4196 (Fax)
hamman.patricia@deq.state.or.us

Where can I get technical information?

Karen White-Fallon, Permit Writer
(503) 378-5315 or (800) 349-7677
750 Front Street NE, Suite 120
Salem, OR 97301-1039
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white-fallon.karen@deq.state.or.us

Where can I get background information?

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

- [Draft Permit](#)
- [Evaluation Report](#)

You can review hard copies of the draft permit and related documents at the Albany Public Library located at 2450 14th Avenue SE, Albany, Oregon and the nearest DEQ office in Salem, OR. For a review appointment, call Patty Hamman at (503) 378-5305.

What is proposed?

DEQ proposes to renew an air permit for Wastequip Manufacturing Company LLC 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 changes to the current plant site emission limits. This permitting action is establishing a netting basis and plant site emission limit for PM_{2.5} for the first time.

Permit expiration

Oregon law requires facilities with a Standard Air Contaminant Discharge Permit to renew that permit every five years. Upon renewal, this permit will be effective for five years, expiring on 10/01/16.

Who is the applicant?

Wastequip Manufacturing Company, LLC
dba Wastequip Oregon
Permit No. 22-0010

Where is the facility located?

33719 Oakville Road
Albany, OR

Who might have an interest?

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

What does Wastequip do that affects air quality?

The facility manufactures a wide variety of metal containers, primarily drop boxes and dumpsters.

The production processes release Particulate Matter (PM), Fine Particulate Matter (PM₁₀ and PM_{2.5}), Volatile Organic Compounds (VOC), and Hazardous Air Pollutants (HAPs) to the air.

What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340, Division 216 gives DEQ the authority to issue Air Contaminant Discharge Permits. OAR Chapter 340 Divisions 200 through 268 contain all pertinent rules that govern the air quality program.

Western Region Air Quality

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www.oregon.gov/DEQ

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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: 01/16/12
By: pah

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 Albany 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 Wastequip 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

How are the permitted substances measured?

The facility uses production usage, material balance and site specific emission calculations to calculate 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 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.

Compliance history:

During the last permit term the facility was inspected on 6/14/06 and 06/22/09 and found to be in compliance with all permit conditions.

What other DEQ permits are required?

The facility has a NPDES storm water permit. The source’s hazardous waste ID# is ORD027620848.

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 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 & 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 DEQ's TTY number, (800) 735-2900.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Particulate Matter (PM)	24	24
Fine Particulate Matter (PM ₁₀)	14	14
Fine Particulate Matter (PM _{2.5})	NA	12
Volatile Organic Compounds (VOC)	80	80
Individual HAP	9	9
Combined HAPs	24	24

Table 2

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Xylene	7.3
Ethyl Benzene	1.6
Toluene	1.1
Glycol Ether	1.8
Welding HAPs (Cr, Co, Mn, Ni)	<u>0.01</u>
TOTAL	11.8

