

Request for Comments

Proposed Renewal of Air Contaminant Discharge Permit for ConAgra Foods Lamb Weston, Inc.



State of Oregon
Department of
Environmental
Quality

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., **Feb. 17, 2012**

Where can I send comments?

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

Where can I get technical information?

Tom Hack, Permit Writer
700 SE Emigrant, Suite 330
Pendleton, OR 97801
(541) 278-4626 or 800-304-3513
(541) 278-0168
Email: [Tom Hack](mailto:Tom.Hack@deq.state.or.us)

Where can I get background information?

You can review 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 Boardman Public Library located at 200 S Main Street and the nearest DEQ office in Pendleton. For a review appointment, call Bobbi DeMauro at (541) 278-4614.

What is proposed?

DEQ proposes to renew an air permit for ConAgra Foods Lamb Weston, Inc. 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 DEQ is adding emission limits for PM_{2.5} and Greenhouse Gases because these are newly regulated pollutants. The emission limits for all other pollutants remain unchanged.

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 Feb. 01, 2017.

Who is the applicant?

ConAgra Foods Lamb Weston, Inc.
PO Box 379
Boardman, OR 97818

Where is the facility located?

750 NE Columbia Ave.
Boardman, OR 97818

The source is not located within 10 kilometers of any Class I Air Quality Protection Areas.

Who might have an interest?

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

What does ConAgra Foods Lamb Weston, Inc. do that affects air quality?

ConAgra Foods Lamb Weston, Inc. operates a potato processing plant consisting of one processing line for producing french fries from raw potatoes.

ConAgra Foods Lamb Weston, Inc. releases Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NO_x), Sulfur Dioxide (SO₂), Volatile Organic Compounds (VOC), Greenhouse Gases, and Hazardous Air Pollutants, to the air.

What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216 give DEQ the authority to

Eastern Region Air Quality

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Website:
www.oregon.gov/DEQ

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By: Nancy Swofford

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 appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

Meeting air quality standards

Air quality in Morrow County 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 ConAgra Foods Lamb Weston, 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: [Air Quality Annual Report and Data Summaries](#)

For more information about hazardous air pollutants: [Health Effects Notebook for Hazardous Air Pollutants \(US EPA\)](#)

How are permitted substances measured?

The facility is required to keep annual records of the volume of natural gas burned in the boiler and dryer, volume, by type, of each alternative fuel burned in the boiler, and weight of finished product processed at the plant. If greenhouse gas emissions equal or exceed 2,756 tons, the permittee must submit a report to the Department.

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.

This 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. The maximum estimated HAP emissions are 1.8 tons per year.

Compliance history:

The facility was issued a Warning Letter in March 2011 for failing to submit their renewal application at least 60 days prior to the expiration date of their existing ACDP. The violation has since been resolved.

What other DEQ permits are required?

No other permits have been issued or are required by the Department of Environmental Quality for this source.

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 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 (tons/yr)	Proposed Limit (tons/yr)
Particulate Matter (PM)	24	24
Small Particulate Matter (PM ₁₀)	14	14
Fine Particulate Matter (PM _{2.5})	N/A	9.0
Nitrogen Oxides (NO _x)	39	39
Sulfur Dioxide (SO ₂)	39	39
Carbon Monoxide (CO)	99	99
Volatile Organic Compounds (VOC)	39	39
Greenhouse Gas – (GHG) (CO ₂ e)	N/A	74,000

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Natural Gas Combustion (Organics & Metals)	1.71
Diesel Oil Combustion (POMs, Organics, Metals)	.09
TOTAL	1.80