

June 1, 2016

Greg Grunow
Oregon Department of Environmental Quality
700 NE Multnomah Street
Portland, OR 97232

**Re: PCC Large Parts Campus Air Discharge Permit 26-1867-ST-01
Notice of Intent to Construct--Dust Collection System Enhancements at MAP**

Dear Greg:

PCC Structurals, Inc. (PCC) is notifying the state of our intent to proceed with upgrades to our particulate emission controls system at our Milwaukie Alloys Processing (MAP) facility located in Milwaukie, Oregon. As we discussed in relation to the permit renewal documents that we submitted to you in November 2015, PCC has been working on the engineering associated with improving our particulate controls systems. We currently use two baghouses to control dust generated by our nickel torch burnoff process. We are going to replace those two existing baghouses on the nickel burnoff operations with a dedicated baghouse equipped with HEPA after-filters. The two existing baghouses currently servicing the nickel burnoff operations will be used to improve ventilation at the titanium burnoff operations which currently exhausts into one baghouse.

The addition of a new, dedicated nickel burnoff baghouse with HEPA filtration will decrease the amount of metal dust emitted from our processes. We believe that adding the HEPA after-filters to the nickel burnoff baghouse will offer an additional 99% or more collection efficiency on top of that provided by the existing baghouses. We anticipate that the HEPA after-filters will reduce emissions of metal dust from this baghouse to a few pounds per year. These actions are consistent with the decrease in our particulate Plant Site Emission Limits (PSELs) that we requested of you in November. Adding these controls is beyond anything required by the DEQ air permitting program, but is consistent with our goal of continuous improvement.

Because there are no new emissions generated from the installation of the new control devices, we do not believe that there is any need for a permit modification before the controls are installed and brought on line. Therefore, we believe that these changes may be accomplished through the NOC process and be classified as Type 1 changes.

We have included an AQ104 form for the upgrade as well as the related control device form. We have not identified any reductions on page 3 of the AQ104 form as the emission factors in

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our permit have yet to be changed. However, as noted above, we anticipate seeing a reduction in the already low levels of emissions from the MAP nickel burnoff operations as a result of the new HEPA filter. We anticipate that this will be reflected in our air permit as part of the ongoing renewal process. We will submit a revised emission inventory to you under separate cover that reflects the new devices and the associated emission factors.

Please call me or Sherry Uchytel if you have any questions about this notification or any of the attached documents.


Sincerely,
For PCC STRUCTURALS, INC. by:

A handwritten signature in black ink, appearing to be 'CM' or similar initials, written in a cursive style.

Chris Myers
Director EHS

FOR DEQ USE ONLY	
Permit Number:	Regional Office:
Application No:	Date Received :

1. Permit Number: <u>ACDP 26-1867</u>	
2. Company	3. Facility Location
Legal Name: <u>PCC Structural, Inc.</u>	Name: <u>Large Parts Campus - Milwaukie Alloy Processing (MAP)</u>
Mailing Address: <u>4600 SE Harney Drive</u>	Street Address: <u>9800 SE McBrod Avenue * NO MAIL*</u>
City, State, Zip Code: <u>Portland OR 97206</u>	City, County, Zip Code: <u>Milwaukie OR 97222 *NO MAIL*</u>
Number of Employees: <u>45</u>	
4. Site Contact Person	5. Standard Industrial Classification Code(s)
Name: <u>Sherry Uchytel</u>	Primary: <u>3369</u>
Title: <u>Environmental Specialist 2</u>	Secondary: <u>NA</u>
Phone number: <u>503-777-7683</u>	6. Type of construction/modification change: (see instructions) <u>Type I</u>
Fax number: <u>503-777-7682</u>	
e-mail address: <u>suchytel@pccstructurals.com</u>	

7. Signature	
<i>I certify that the information contained in this notice, including any schedules and exhibits attached to the notice, are true and correct to the best of my knowledge and belief.</i>	
<u>Chris Myers</u> Name of official (Printed or Typed)	<u>EHS Director 503-777-7494</u> Title of official and phone number
 _____ Signature of official	<u>6/1/14</u> _____ Date

SUBMIT TWO COPIES OF THE COMPLETED NOTICE OF INTENT TO CONSTRUCT TO THE DEPARTMENT REGIONAL OFFICE SHOWN BELOW:

Oregon Department of Environmental Quality
 Northwest Region
 2020 SW 4th St, #400
 Portland, OR 97201

Construction Information

8. Description of proposed construction:

Install a new Baghouse #9031 equipped with high performance HEPA filters to control emissions from Nickel Torch Burnoff Booths.

Baghouses #0803 and #0807, currently servicing nickel torch burnoff booths, will be rerouted to control emissions from the titanium torch burnoff booths.

Baghouses provide a minimum 99.9% removal efficiency for PM @ 10 micron.
HEPA filters provide a minimum 99.97% removal efficiency for PM @ 0.3 micron.

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9. Will the construction increase the capacity of the facility? No If yes, how much? NA
10. Will the construction increase pollutant emissions? No If yes, how much (see question 18)?
11. Will the construction cause new pollutant emissions? No If yes, which pollutants and how much? NA
12. Estimated timing of construction.
- a. Commence date: 04/2016
 - b. Begin date: 06/2016
 - c. Completion date: expect to complete installation early July, 2016
13. Will tax credits be requested once construction is completed? No
14. Attach relevant forms from Form Series AQ200, Device/Process Forms. NA
15. Attach relevant forms from Form Series AQ300, Control Device Description Forms. See attached AQ304
16. Attach process flow diagram. On file at DEQ
17. Attach a city map or drawing showing the facility location. On file at DEQ
18. If applicable, attach a Land Use Compatibility Statement. NA

Facility Name: PCC Structurals, Inc. LPC

Permit Number: 26-1867

1.	Control Device ID	MAP Nickel Torch Burnoff Baghouse with HEPA filter #9031
2.	Process/Device(s) Controlled	Metals from torch cutting nickel-based metal revert
3.	Year installed	2016
4.	Manufacturer/ Model No.	Baghouse: DONALDSON DFT 4-160 HEPA: CAMFIL GLIDE PAK
5.	Control Efficiency in %	Baghouse Cartridges: 99.9% @ 10 micron HEPA filters: 99.97% @ at 0.3 micron
6.	Type of cleaning mechanism and frequency	Baghouse: REVERSE PULSE W/ DP TIMER HEPA filter: Static
7.	Design inlet gas flow rate (acfm)	ACFM: 50,000 SCFM
8.	Number of bags	Baghouse: 160 cartridges HEPA Filters: 32 filters
9.	Design air-to-cloth ratio	Baghouse: 1.64 : 1 HEPA filters: NA
10.	Design pressure drop (inches of water)	Baghouse cartridges: 6" WC, HEPA filters: 4" WC
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	HEPA inlet is treated with exhaust from upstream baghouse described on this form.

1. Enter the control device identification label.
2. Enter the processes and/ or devices controlled by this unit. May use ID labels or descriptions.
3. Enter the year the control device was, or will be installed.
4. Enter the manufacturer and model number of the control device.
5. Enter the rated control efficiency, in percent, for the control device.
6. Describe the baghouse cleaning mechanism (shaker, pulse jet, reverse air, etc.).
Specify the frequency with which cleaning is performed.
7. Enter the design inlet gas flow rate (actual cubic feet per minute).
8. Enter the number of bags that make up the baghouse.
9. Enter the design air to cloth ratio (square feet of total bag surface area divided by air flow).
10. Enter the design pressure drop across the baghouse (inches of water).
11. Describe/List any inlet gas pretreatment systems/devices. If the pretreatment systems are separate control devices, complete the appropriate control device description form for each device.