



February 19, 2016

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

**Re: PCC Small Structural Business Operation Air Discharge Permit 03-2674
Notice of Intent to Construct--Dust Collection System Enhancements**

Dear Greg:

PCC Structural, Inc. (PCC) Small Structural Business Operation (SSBO) is notifying the state of our intent to proceed with upgrades to our particulate emission controls system. Consistent with our discussions last fall related to Large Parts Campus (LPC), PCC has been working on the engineering associated with improving our particulate controls systems at SSBO and SSBO Satellite #1 (SSB1). The following three projects covered by this construction approval application: (1) install new high performance baghouse controls on the SSBO torch burnoff booth exhaust, (2) route the existing swing grind booth cyclone to existing baghouse #1680, and (3) install new high performance baghouse controls on the SSB1 torch burnoff booth exhaust. We expect these projects to commence construction in the upcoming weeks.

The addition of these baghouse controls will decrease the amount of metal dust emitted from our processes at SSBO and SSB1. We believe that the new baghouse controls will achieve a 99.9% or greater reduction particulate metal emissions. Similar control will occur on the swing grind booth cyclone exhaust as it is routed to the existing baghouse #1680. 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 these 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 I changes.

We have included an AQ104 form for the upgrades as well as the related control device forms. We have not identified any reductions on page 3 of the AQ104 form as the emission factors in our permit have yet to be changed. However, as noted above, the actual reduction in particulate

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(e.g., metal dust) emissions will be significant. 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 "Chris Myers", 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 03-2674</u>	
2. Company	3. Facility Location
Legal Name: <u>PCC Structural, Inc.</u>	Name: <u>SSBO</u>
Mailing Address: <u>4600 SE Harney Drive</u>	Street Address: <u>13340 SE 84th Ave</u>
City, State, Zip Code: <u>Portland OR 97206</u>	City, County, Zip Code: <u>Clackamas OR 97015</u>
Number of Employees: <u>1050</u>	Physical Address: <u>13340 SE 84th Avenue Clackamas Oregon 97015 and</u> <u>13521 Johnson Rd. Milwaukie OR 97222</u>
4. Site Contact Person	5. Standard Industrial Classification Code(s)
Name: <u>Sherry Uchtyl</u>	Primary: <u>3369</u>
Title: <u>Environmental Affairs Technician V</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>suchtyl@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>	
Chris Myers _____	Director of Environmental, Health and Safety 503-777-7494
Name of official (Printed or Typed)	Title of official and phone number
 _____	<u>2/19/16</u> _____
Signature of official	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:

SSBO

1. Redirect Swing Grind Booth Cyclone exhaust from roof to existing baghouse ##1680.
2. Install a new high performance baghouse to capture exhaust from SSBO Torch Burnoff Booth operations.

SSB1

3. Install Torch Burnoff Booth(s) and a high performance baghouse to capture exhaust from SSB1 Torch Burnoff Booth operations.
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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)? <NA
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: 02/19/2016
 - b. Begin date: 03/07/2016
 - c. Completion date: expected to be completed by 03/31/2016
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 (2) attached AQ304 forms for new baghouses
16. Attach process flow diagram. Process description on file
17. Attach a city map or drawing showing the facility location. On file
18. If applicable, attach a Land Use Compatibility Statement. NA

Emissions Data

19. Pre-and Post-Construction emissions summary data

a. Emissions Point	b. Pollutant	c. Pre-Construction Emissions		d. Post-Construction Emissions	
		short-term (specify unit)	Annual (tons/year)	short-term (specify unit)	Annual (tons/year)
SSBO	NO _x	NA	39	NA	39
SSBO	CO	NA	99	NA	99
SSBO	VOC	NA	39	NA	39
SSBO	PM	NA	24	NA	24
SSBO	PM ₁₀	NA	14	NA	14
SSBO	HAPS-Ind	NA	9	NA	9
SSBO	HAPS-Agg	NA	24	NA	24

**BAGHOUSE
CONTROL DEVICE INFORMATION**

**AQ304
ANSWER SHEET**

Facility Name: PCC Structurals, Inc. SSBO Permit Number: 03-2674

1.	Control Device ID	SSBO Torch Burnoff Booth Baghouse #TBD
2.	Process/Device(s) Controlled	Metals from torch burnoff operation.
3.	Year installed	2016
4.	Manufacturer/ Model No.	Carothers 100TR-10-HEI
5.	Control Efficiency in %	99.99% Removal Efficiency PM10, 99.9% Removal Efficiency PM 2.5
6.	Type of cleaning mechanism and frequency	Reverse Pulse Jet – 30 seconds
7.	Design inlet gas flow rate (acfm)	12,000 ACFM
8.	Number of bags	100 Bags @ 99.99% Removal Efficiency PM10, 99.9% Removal Efficiency PM 2.5
9.	Design air-to-cloth ratio	7.64:1
10.	Design pressure drop (inches of water)	Flange to Flange 2-4"WC Max -20"WC Max differential 4"
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	NO

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.

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