

Request for Comments – Notice of Public Hearing

Proposed Issuance of Air Quality Permit and Scheduled Public Hearing for Plas2Fuel Corporation's Energy Reclamation Facility



State of Oregon
Department of
Environmental
Quality

The purpose of this notice is to invite you to provide written or oral comments on an air quality permit proposed for issuance to Plas2Fuel Corporation for operation of an energy reclamation facility. You may provide oral as well as written comments at the scheduled public hearing. Also, you may provide written comments to DEQ at any time throughout the public comment period.

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.

Hearing details:

Place: Tigard City Hall
Town Hall Room

Address:
13125 SW Hall Blvd, Tigard Oregon

Date: February 25, 2010

Time: Information session begins at 6:30 p.m. with formal hearing to follow:

Comments due:

Written comments due: 5 p.m., February 26, 2010, 5pm

Where can I send my comments?

Catherine Blaine, Permit Coordinator
(503)229-5582 or (800)452-4011 (Toll Free)
2020 SW 4th Ave., Suite 400
Portland, OR 97201
(503)674-5148 (Fax)
nwraqpermits@deq.state.or.us

Where can I get technical information?

Greg Grunow – Permit Writer
(503)667-8414, x55015 or (800)452-4011
1550 NW Eastman Pkwy., Suite 290
Gresham, OR 97030

(503)674-5148 (Fax)
grunow.greg@deq.state.or.us

Where can I get information?

The draft permit and Review report are viewable online by clicking the following link(s):

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

You can review hard copies of the draft permit and related documents at Tigard Public Library, located at 13500 SW Hall Blvd in Tigard, Oregon, and the DEQ Northwest Regional Office in Portland. For a review appointment at DEQ, call Susan Curry at (503)229-6736.

What is proposed?

DEQ proposes to issue an air permit for Plas2Fuel Corporation's proposed energy reclamation 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.

Since this will be a new permit, all conditions are new to this facility.

Permit expiration

Oregon law requires facilities with a Simple Permit to renew that permit every five years. Upon issuance, this permit will be effective for five years, expiring on January 1, 2015.

Who is the applicant?

Plas2Fuel Corporation
Permit number 34-9514-SI-01

Where is the facility located?

7904 SW Hunziker Rd
Tigard, OR

Who might have an interest?

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

What does Plas2Fuel Corporation do that affects air quality?

Plas2Fuel Corporation proposes to construct and operate an energy reclamation facility at the

Northwest Region Air Quality

2020 SW 4th Ave., Suite 400
Portland, OR 97201

Phone: (503) 229-5554
(800) 452-4011

Fax: (503) 229-6945

Contact: Greg Grunow

E-mail:

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www.oregon.gov/DEQ

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subscriptions@deq.state.or.us

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Notice Issued: 01/21/10
By: Catherine Blaine

identified address. The proposed facility will produce a synthetic crude oil-like product from scrap plastics. The product will be sold to off-site customers. The process includes four sealed reclamation chambers where the scrap plastic material is gasified in the absence of oxygen (combustion cannot occur). The gases that are produced are condensed and converted into the liquefied final product. During the process, a fraction of the gases produced are noncondensable and therefore remain as gases. The noncondensable gases (gaseous emissions) are captured and ducted to a thermal oxidizer air pollution control device for combustion. The finished product is a gel-like substance at normal room temperature and is to be stored in a tank capable of being heated. The tank is normally operated at ambient temperature, but will be heated immediately prior to product shipment to allow the product to be pumped.

The combustion of natural gas and noncondensable gases in heating equipment releases small amounts of Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NOx), and Volatile Organic Compounds (VOCs) to the air as products of incomplete combustion. VOCs are also emitted from the product storage tank when the tank vapor space is displaced from filling or thermal expansion (breathing losses). Some of the VOCs are classified as hazardous air pollutants (HAPs).

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

Meeting air quality standards

Air quality in the Portland/Metro 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 permittee's air emissions will not result in a violation of those standards. DEQ establishes permit

emission limits to 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 may cause environmental damage or if inhaled in sufficient quantity and for sufficient duration, 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 in sufficient quantity and for sufficient duration, may pose a threat of adverse health 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.

Plas2Fuel Corporation has operated a smaller version of the proposed facility as a pilot project in Brooks, Oregon, with a company called Agriplas. The pilot operation allowed the permittee to demonstrate the technology, optimize the system and obtain associated emissions data.

While some of the VOCs that will be emitted by the facility are classified as HAPs, the facility was evaluated to be a minor source of such emissions with total HAP emissions estimated to be less than one ton per year.

For more information about criteria pollutants, go to:

<http://www.deq.state.or.us/air/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?

Pollutant emissions are calculated using established emission factors (pounds of pollutants emitted per unit of production). The



permit includes a requirement for the permittee to perform source testing for emission factor verification.

Emissions and permit limits

Table 1 below presents the maximum allowable emissions for the facility in the Proposed Emission Limits column. These limits reflect 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 proposed limits established in a permit. While Oregon rules would allow actual emissions to increase up to the permitted limit, Table 1 includes a column with estimates of the maximum actual emissions the facility would be able to achieve based on its operational design.

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 specific regulation for HAP emissions. The facility was estimated to have aggregate HAP emission of less than 1 ton per year.

What other DEQ permits are required?

At the time of this public notice the need of other Department permits is still being evaluated.

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 after the hearing?

DEQ will consider and provide responses to all public comments received at the close of the comment period. As a result of the comments 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 the Oregon Telecommunications Relay Service for assistance(800-735-2900).

Criteria Pollutant	Proposed Emission Limit (tons/yr)	Estimated Maximum Emission Rates (tons/yr)
Particulate Matter (PM/PM ₁₀)	Neg.*	< 1
Nitrogen Oxides (NO _x)	39	2.8
Sulfur Dioxide (SO ₂)	Neg.*	< 1
Carbon Monoxide (CO)	99	2.0
Volatile Organic Compounds (VOC)	39	8.9

*emissions are below de minimis level and considered negligible

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Individual HAPs	<1
Total HAPs	<1

