

# Request for Comments

## Proposed Issuance of an Air Quality Permit for Agri-Plas2Crude, Inc.



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 issuance.

### 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., March 5, 2010.

### 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  
(503) 378-4196 (Fax)  
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):

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

You can review hard copies of the draft permit and related documents at the Salem Public Library located at 585 Liberty Street Southeast Salem, OR 97301-3591 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 issue an air permit for Agri-Plas2Crude, 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.

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?

Agri-Plas2Crude, Inc.  
Permit Number 24-9208-SI-01

### Where is the facility located?

5016 Waconda Rd NE  
Brooks, Oregon 97305

### Who might have an interest?

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

### What does Agri-Plas2Crude, Inc. do that affects air quality?

Agri-Plas2Crude proposes to construct and operate an energy reclamation facility at the identified address. The proposed facility will produce a synthetic crude oil-like product from waste plastics. The product will be sold to off-site customers. The process includes four sealed reclamation chambers where waste 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 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 Particulate Matter (PM), small particulate matter (PM<sub>10</sub>) Carbon Monoxide (CO), Nitrogen Oxide (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>), and Volatile Organic

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[www.oregon.gov/DEQ](http://www.oregon.gov/DEQ)

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Notice Issued: 02/02/10  
By: [pah](#)

Compounds (VOCs) to the air as part 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).

### **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 Brooks 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 Agri-Plas2Crude, 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.

In a pilot venture business operation, another company, Plas2Fuel Corporation, is proposing to operate a similar facility in Tigard, Oregon. The Plas2Fuel air permitting is being conducted concurrently with this proposed Agri-Plas2Fuel facility.

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 emission estimated to be less than one ton per year.

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](http://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 permit. These limits reflect the maximum amount of emission 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 specific regulation for HAP emissions. The facility is estimated to have aggregated HAP emissions of less than 1 ton per year.

### **Compliance history:**

This is a new facility and will be inspected on a routine basis.

### **What other DEQ permits are required?**

The facility currently has a Solid Waste Treatment permit and is in the process of applying for a storm water permit.

### **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 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](mailto:deqinfo@deq.state.or.us).

People with hearing impairments may call the Oregon Telecommunications Relay Service for assistance (800) 735-2900.

<b>Criteria Pollutant</b>	<b>Proposed Emission Limit (tons/yr)</b>	<b>Maximum Estimated Emissions (tons/yr)</b>
Particulate Matter (PM/ PM <sub>10</sub> )	NA	<1
Nitrogen Oxides (NO <sub>x</sub> )	39	2.8
Sulfur Dioxide (SO <sub>2</sub> )	NA	<1
Carbon Monoxide (CO)	99	2.0
Volatile Organic Compounds (VOC)	39	8.9