

Request for Comments

Proposed renewal of Air Quality Permit for Wolf Steel Foundry, Inc.

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., February 27, 2012

Where can I get technical information or send my comments?

Kathy Amidon, Permit Writer
(503) 667-8414, ext. 55010
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Gresham, OR 97030
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Where can I get background information?

Information about this project is viewable online by clicking the following link(s):

[Draft Permit Review Report](#)

You can review hard copies of the draft permit and related documents at the Rockwood library located at 17917 SE Stark Street and the DEQ office in Gresham. For a review appointment, call Kathy Amidon at (503) 667-8414, ext 55010.

What is proposed?

DEQ proposes to renew an air permit for the 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.

The permittee is not proposing any changes to the emission limits in the renewal permit.

Permit expiration

Revised 11/11

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 10/1/2016.

What is the permit number?

03-0016-SI-01

Who is the applicant?

Wolf Steel Foundry, Inc.

Where is the facility located?

6160 S. Whiskey Hill Road
Hubbard, OR 97032

Who might have an interest?

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

What does the facility do that affects air quality?

The permittee operates a steel foundry in a rural location. Metal pieces are melted, poured into molds. Parts are removed from the molds, cleaned and finished. The sand is reclaimed and reused. The facility does not use vehicle scrap which might contain mercury switches. The melting furnaces are fired on natural gas and electricity.

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 - 268 contain 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 the area 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 the facility



State of Oregon
Department of
Environmental
Quality

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By: pah

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?

All criteria pollutants, as listed above, are considered when setting permit limits. A limit is set for each criteria pollutant and HAPs that are emitted above the de minimis level listed in OAR 340-200-0020, Table 4.

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.

The facility’s potential to emit HAPs: 3.4 tons methyl ethyl ketone (MEK), 2.4 tons xylene, a total of 3.8 tons HAP from binder constituents and less than one ton other HAPs for a total of 10 tons /year. Individual and total HAP are below levels that would require permit conditions under the current rules.

For more information about criteria pollutants: <http://www.deq.state.or.us/aq/forms/annrpt.htm>

For more information about hazardous air pollutants: www.epa.gov/ttn/atw/hlthef/hapindex.html

How are permitted substances measured?

The facility uses a mass balance method to determine VOC emissions from the molding process and standard emission factors to determine particulate matter (PM) emissions.

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 the existing 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.

Compliance history:

No complaints against the facility have been recorded by the Department. The facility was inspected in 2010 and found to be in compliance with the permit conditions. One Warning Letter was issued to the facility in 2011 for failure to submit the notification of size required under federal rule in a timely manner. The information was submitted and the violation resolved.

Are there special conditions of this permit?

Metal used to make the steel produced at the facility contains very small amounts of metal HAPs that are released during machining, and dry abrasive operations. The US EPA has promulgated rules to ensure best work practices to minimize HAP emissions. DEQ has adopted the rule and included the work practices in the proposed permit.

VOC is released during the molding/unmolding process. Particulate matter is emitted during machining and dry abrasive blasting. The sand reclamation process and abrasive blasting are controlled by baghouses.

What other sources of air pollutants are in the vicinity of the facility?

Two other facilities are located at this site, Ulven Forging and Skookum, a metal finishing shop. These facilities are small sources of VOC and PM emissions.

EPA and DEQ split up the sources into three 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.

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)
Particulate Matter (PM)	14	9
Volatile Organic Compounds (VOC)	39	39

