

# Request for Comments – Notice of Public Hearing

## Proposed issuance of Air Quality Permit and Scheduled Public Hearing for Waste Management of Oregon, Inc.



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 Waste Management of Oregon, Inc., 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.

### Comments due:

Written comments are due by: 5 p.m., March 12<sup>th</sup>, 2012.

### Hearing details and location:

Hearing date: March 6, 2012

Location: **St. Johns Community Center  
Room - Auditorium  
8427 North Central Street  
Portland, OR 97203**

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

### Where can I send my comments?

ODEQ

Attn: Greg Grunow

1550 NW Eastman Pkwy., Suite 290

Gresham, OR 97030

Fax: (503)674-5148

grunow.greg@deq.state.or.us

### Where can I get technical information?

Greg Grunow – Permit Writer

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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 Kenton Library located at 8226 North Denver Avenue in Portland, and the DEQ Northwest Regional Office in Portland. For a review appointment at DEQ, contact Susan Curry at (503)229-6736.

### What is proposed?

DEQ proposes to issue an air permit to Waste Management of Oregon, Inc. The company will do business as WM Agilyx Wastech. DEQ 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 Standard Air Contaminant Discharge Permit to renew that permit every five years. Upon issuance, this permit will be effective for five years, expiring on January 1<sup>st</sup>, 2017.

### Who is the applicant?

Waste Management of Oregon, Inc.

dba WM Agilyx Wastech

Permit No. 26-0170-ST-01

### Where will the facility be located?

701 N. Hunt Street

Portland, OR 97218

### Who might have an interest?

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

### What will WM Agilyx Wastech do that affects air quality?

The company 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 plastic feedstock. The feedstock will consist of plastics not feasible for recycling. Prior to receipt, mixed plastic feed stock materials will have been pre-processed with equipment designed to remove at

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Notice Issued: 01/31/12

By: pah

least 90% of entrained polyvinyl chloride (PVC) plastic. The synthetic crude oil product will be sold to off-site customers.

The process includes sixteen sealed plastics reclamation units (PRUs) configured in four “pods” of four PRUs each. Feedstock is loaded into a processing cartridge and inserted into a PRU chamber. The chamber is heated and feedstock is gasified in the absence of oxygen. Each PRU is constantly under vacuum and process gases are evacuated to a condensing system to be liquefied into final product. A fraction of process gases are noncondensable at ambient temperatures and pressure and therefore remain as gases. Noncondensable gases (gaseous emissions) are ducted to a pollution control device for combustion and destruction.

The finished product is a solid to gel-like substance at room temperature and will be stored in two tanks capable of being heated. The tanks will be operated at ambient temperature and then heated prior to product shipment to allow the product to be pumped. The truck loading process will include a vapor recovery system to capture displaced vapors and return them to the storage tanks. The vapor space of each storage tank will be plumbed back into the facility’s process gas system to allow the gaseous hydrocarbon emissions that might otherwise vent to atmosphere, to be captured and returned for reprocessing in the condensing system of the production process. After each process cycle the cartridges are removed from the PRUs, cooled under vacuum and then cleaned of carbon deposits. The collected carbon is stored in super sacks and later shipped to end users (e.g., asphalt plants, steel makers, landfill).

The combustion of natural gas and noncondensable gases in process heating equipment releases Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxides (NO<sub>x</sub>), Sulfur Dioxide (SO<sub>2</sub>), Volatile Organic Compounds (VOCs) and Greenhouse Gases (GHG) to the air as products of combustion. Some of the emitted pollutants 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 may 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 Portland Metro area meets the National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (EPA) to protect public health. DEQ is responsible for establishing permit emissions limits that ensure these air quality standards are not violated. DEQ has determined the air emissions from the WM Agilyx Wastech operation will not result in a violation of the NAAQS standards.

### **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 such as 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.

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 requirements 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 allowed 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 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 (see Table 2). The facility was estimated to have combined HAP emissions of less than 3 tons per year. EPA has not developed specific HAP limiting regulations for this type of source.

**Compliance history:**

After the facility achieves normal operation, it will be inspected by DEQ personnel to ensure compliance with the permit conditions.

**What other DEQ permits are required?**

Other permits issued or required by the Department of Environmental Quality for this source include: Stormwater 1200-COLS, File No. 105744.

**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 hearing as well as those received throughout the comment period. As a result of the comments DEQ may modify provisions in the proposed permit, but permit writers can only modify conditions of the permit in accordance with the rules and statutes under DEQ’s authority. 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).

Criteria Pollutant	Current Emission Limit (tons/yr)	Proposed Emission Limit (tons/yr)	Estimated Maximum Actual Emissions(tons/yr)
Particulate Matter (PM/PM <sub>10</sub> /PM <sub>2.5</sub> )	NA	9	5
Nitrogen Oxides (NO <sub>x</sub> )	NA	39	25
Sulfur Dioxide (SO <sub>2</sub> )	NA	39	4
Carbon Monoxide (CO)	NA	99	4
Volatile Organic Compounds (VOC)	NA	39	<1
Greenhouse Gas (CO <sub>2</sub> e)*	NA	74,000	8,868

\* Greenhouse Gases are not a criteria air pollutant, but they are a regulated air pollutant. The facility will have GHG emissions above the de minimis level, so an emission limit has been included in the permit.

Hazardous Air Pollutants	Proposed Emission Limit (tons/yr)	Potential Emissions (tons/yr)	Estimated Maximum Actual Emissions (tons/yr)
Single HAP*	9	1.1	<1
Combined HAPs	24	<3	2

\* HCl is the only HAP the facility has potential to emit above the de minimis emission rate (1 ton/yr).

