

# Request for Comments

## Proposed Renewal of Simple Air Contaminant Discharge Permit for Les Schwab Warehouse Center, Inc.



State of Oregon  
Department of  
Environmental  
Quality

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., **March 9, 2012**

### Where can I send comments?

Nancy Swofford, Permit Coordinator  
475 NE Bellevue Dr., Suite 110  
Bend, OR 97701  
(541) 633-2021 or 866-863-6668 (Toll Free)  
Fax: (541) 388-8283  
Email: [Nancy Swofford](mailto:Nancy.Swofford@deq.state.or.us)

### Where can I get technical information?

Tom Hack, Permit Writer  
700 SE Emigrant, Suite 330  
Pendleton, OR 97801  
(541) 278-4626 or 800-304-3513 (Toll Free)  
Fax: (541) 278-0168  
Email: [Tom Hack](mailto:Tom.Hack@deq.state.or.us)

### Where can I get background information?

You can review electronic versions of the draft permit and review report by clicking on the links below:

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

You can review hard copies of the draft permit and related documents at the Crook County Library located at 175 NW Meadow Lakes Dr. in Prineville and the DEQ office in Bend. For a review appointment, call Nancy Swofford at (541) 633-2021.

### What is proposed?

DEQ proposes to renew an air permit for Les Schwab Warehouse Center 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 DEQ is adding emission limits for PM<sub>2.5</sub> and Greenhouse Gases because these are newly regulated pollutants. The emission limits for all other pollutants remain unchanged.

### Permit expiration

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 03/01/2017

### Who is the applicant?

Les Schwab Warehouse Center, Inc.  
PO Box 5350  
Bend, OR 97708

### Where is the facility located?

Les Schwab Production Center  
717 NW Madras Highway  
Prineville, OR 97754

The source is not located within 10 kilometers of any Class I Air Quality Protection Areas.

### Who might have an interest?

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

### What does Les Schwab Warehouse Center do that affects air quality?

The facility processes three types of tires; passenger/light truck tires, truck tires, and off the road (OTR/heavy equipment) tires. All processed used-tires originate from Les Schwab facilities.

Les Schwab Warehouse Center releases Particulate Matter, Carbon Monoxide, Nitrogen Oxide, Sulfur Dioxide, Volatile Organic Compounds, Greenhouse Gases, and Hazardous Air Pollutants to the air.

### What legal requirements apply?

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216 give DEQ the authority to

### Eastern Region Air Quality

475 NE Bellevue Dr., # 110  
Bend, OR 97701  
Phone: (541) 388-6146  
(866) 863-6668  
Fax: (541) 388-8283  
Contact: Tom Hack,  
Permit Writer  
(541) 278-4626

E-mail:  
[hack.tom@deq.state.or.us](mailto:hack.tom@deq.state.or.us)

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

If you received a hard copy of this notice in the mail, please consider receiving updates via email instead. Send your request to:  
[subscriptions@deq.state.or.us](mailto:subscriptions@deq.state.or.us)

Please include your full name, email address and mailing address so that we can purge you from our print mailing list, thus saving trees and taxpayer dollars.

Notice Issued: Feb. 7, 2012  
By: Nancy Swofford

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

### **Meeting air quality standards**

Air quality in Crook County 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 Les Schwab Warehouse Center 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.

For more information about criteria pollutants: ["What are the Six Common Air Pollutants?" \(US EPA\)](#)

For more information about hazardous air pollutants: [Health Effects Notebook for Hazardous Air Pollutants \(US EPA\)](#)

### **How are permitted substances measured?**

The facility is required to keep annual records of the highest percent sulfur (by weight) of each ASTM grade of fuel oil combusted in the Cleaver Brooks boiler, and process and production records of all emissions devices or activities.

### **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 their existing permit. The Proposed Emission Limit reflects 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 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 regulation for HAPs. In the past calendar year, Les Schwab Warehouse Center estimated total HAP emissions of 0.64 tons per year and 0.19 tons per year of Ethane.

### **Compliance history:**

The facility was inspected in August 2011 and was found to be in compliance with permit conditions. No complaints or enforcement actions have been taken against this source since the last permit renewal.

### **Are there special conditions of this permit?**

The source is required to provide the DEQ with written notification of all nuisance complaints received within 5 days.

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

Other permits issued or required by the DEQ for this source include a Stormwater 1200-Z 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 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](mailto:deqinfo@deq.state.or.us).

People with hearing impairments may call 711.

**Table 1**

<b>Criteria Pollutant</b>	<b>Current Limit (<u>tons/yr</u>)</b>	<b>Proposed Limit (<u>tons/yr</u>)</b>
Particulate Matter (PM)	24	24
Small Particulate Matter (PM <sub>10</sub> )	14	14
Fine Particulate Matter (PM <sub>2.5</sub> )	NA	9
Nitrogen Oxides (NO <sub>x</sub> )	39	39
Sulfur Dioxide (SO <sub>2</sub> )	39	39
Carbon Monoxide (CO)	99	99
Volatile Organic Compounds (VOC)	39	39
Greenhouse Gases (GHG) (CO <sub>2</sub> e)	NA	74,000