



February 15, 2023

Mr. David Graiver
Oregon DEQ Air Quality
Northwest Region
700 NE Multnomah St., Ste #600
Portland Oregon 97232

RE: PCC Structural, Inc SSBO 2022 Annual Air Report, ACDP 03-2674-ST-01

Dear Mr. Graiver,

Attached is the annual report for PCC Structural, Inc. SSBO facility. Our air permit is currently in the process of being renewed. The calculations in this report are based on the emissions factors specified in the facility's permit, currently in effect. This approach to completing the annual report is required by the terms of the permit. As you know, PCC has developed new emission factors for use in the renewed permit. These new emission factors reflect our improved process understanding and the additional controls which PCC installed in order to further reduce the emission rates for this facility.

The emission rates included in the annual report accurately reflect the emission factors in the current permit. However, they do not accurately reflect past or current emission rates for the facility; we believe that they significantly overstate the actual emissions from certain processes. We understand that revised emission factors will be added to the permit upon renewal.

Condition 6.2.a.

PCC believes it was in compliance with all requirements of the permit with the exception of notification to the state of the SSBO Thermal Oxidizer downtimes exceeding one hour. Whenever environmental was notified in a timely manner, this obligation was met. However, new staffing has led to lack of communication between the staff inspecting the downtime and the environmental department. For the 2023 year, PCC is pursuing establishing an electronic reporting system with the intent of improving the downtime reporting process. Currently, engineers have backordered the required computer components to enact this change.

Condition 6.2.b.i-xiv.

A summary page is provided for usage of required parameters in specified units for the calendar year. Also provided is the incinerator downtime log and the annual alloy report.

Mr. David Graiver
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Condition 6.2.c.

Please refer to the attached summary report.

Condition 6.2.d.

Please refer to the attached summary report.

Condition 6.2.e.

Please refer to the attached summary report.

Condition 6.2.f.

Please refer to the attached downtime log.

Please contact me at (503)-724-3036 if you have any questions regarding this report.

Sincerely,
For PCC Structural Inc. by

A handwritten signature in blue ink that reads "Brandon Hadzinsky". The signature is written in a cursive style with a large, looping flourish at the end.

Brandon Hadzinsky
PCC Structural, Inc.
Environmental Affairs

Attachments: Operating and Emissions Summary Report
 Thermal Oxidizer Downtime Log
 Alloy Report- HAPs Summary

SSBO ACDP 032674

Annual Air Permit Report for Calendar 2022

Condition 6.2. a. Compliance status with permit conditions, violations, exceedance explanation **See cover letter**

Condition 6.2. b.i-xiv Usage for calendar year **See below**

- b. i MM cf Natural Gas Used 166.4 MM cf
- b. ii other fuels used -
- b. iii tons metal cast 1,692.1 tons
- b.iv tons metal air cast 375.5 tons
- b. v tons individual HAP metal cast 1,085.3 tons
- b. vi tons individual HAP metal air cast 240.8 tons
- b. vii tons combined HAP metal cast 1,295.3 tons
- b. viii tons combined HAP metal air cast 287.4 tons
- b. ix tons metal poured using filled wax 1,385.3 tons
- b. x tons baghouse dust collected 162.1 tons
- tons cyclone dust collected - tons
- b. xi tons Investing and misc VOC used 192.3 tons
- b. xii Revision of pollutant capture efficiency function used for compliance emission calculations Condition
- b. xiii. tons VOC/HAP waste collected 0.3 tons
- b. xiv Emissions for calendar year **See below**

SSBO 12-month Rolling Emissions 2021-2022										
Emissions Time Frame		PM tons	PM10 tons	CO tons	NOx tons	VOC tons	Combined HAP tons	Individual VOC HAP tons	Individual PM HAP tons	Individual Other HAP tons
January	02/2021-01/2022	3.7	2.7	6.3	7.5	10.2	3.9	2.6	1.0	0.0
February	03/2021-02/2022	3.9	2.8	6.3	7.5	10.2	3.9	2.6	1.0	0.0
March	04/2021-03/2022	4.0	2.9	6.3	7.5	12.0	4.1	2.7	1.1	0.0
April	05/2021-04/2022	4.1	3.0	6.4	7.6	11.9	4.0	2.7	1.1	0.0
May	06/2021-05/2022	4.1	3.0	6.5	7.8	11.9	4.1	2.8	1.1	0.0
June	07/2021-06/2022	4.2	3.0	6.6	7.8	11.9	4.2	2.8	1.1	0.0
July	08/2021-07/2022	4.2	3.1	6.6	7.9	11.9	4.2	2.7	1.2	0.0
August	09/2021-08/2022	4.2	3.0	6.7	8.0	12.0	4.3	2.8	1.2	0.0
September	10/2021-09/2022	4.3	3.1	6.8	8.0	12.4	4.1	2.7	1.2	0.0
October	11/2021-10/2022	4.3	3.1	6.8	8.1	12.1	4.2	2.7	1.2	0.0
November	12/2021-11/2022	4.3	3.1	6.9	8.2	12.3	4.2	2.7	1.2	0.0
December	01/2022-12/2022	4.3	3.1	7.0	8.3	12.5	4.1	2.7	1.2	0.0
Highest 12-month total		4.3	3.1	7.0	8.3	12.5	4.3	2.8	1.2	0.0
12-month limit (tpy)		24.0	14.0	99.0	39.0	39.0	24	9.0	9.0	9.0
Percent of Limit		18%	22%	7%	21%	32%	18%	31%	13%	0%

Condition 6.2. c Records of planned, unplanned emissions events See SSBO Thermal Oxidizer Downtime Log

Condition 6.2. d Summary of complaints relating to air quality received by permittee during year. None

Condition 6.2. e Permanent changes in process, production levels, pollution control equipment.

NC# 34017	Baghouse 4897 Removed from service at SSBO
NC# 32681	Replacement of BH 2019 & 4718 with 10499 & 10498
NC# 030832	Installation of FF#2 (BO# 36)

Condition 6.2. f Major maintenance performed on pollution control equipment See SSBO Thermal Oxidizer Downtime Log

Additional Information See SSBO Alloy Report

SSBO Thermal Oxidizer Downtime

2022	Downtime			Monthly Emissions			Reason for Incinerator Downtime
	Date	Hours	Min	VOC (lbs)	HAP (lbs)	VOC/HAP (lbs)	
January	No Downtime						
February	No Downtime						
March	3/21/2022	14	0	569.1	0.1	0.0	Planned Shutdown for VOC cooling.
	3/22/2022	24	0	975.6	0.2	0.0	Planned Shutdown. Contractors in house for maintenance.
	3/23/2022	24	0	975.6	0.2	0.0	Planned Shutdown. Contractors in house for maintenance.
	3/24/2022	19	0	772.4	0.1	0.0	Planned Shutdown end of maintenance and powered on.
Mo. Totals		81	0	3292.8	0.6	0.0	
April	No Downtime						
May	No Downtime						
June	No Downtime						
July	No Downtime						
August	8/31/2022	1	50	73.3	0.00	0.0	Flame out due to combustion air pressure
Mo. Totals		1	50	73.3	0.0	0.0	
September	9/10/2022	22	30	883.2	0.20	0.0	DT from clogged combustion filter.
Mo. Totals		22	30	883.2	0.2	0.0	
October	10/22/2022	17	40	781.2	0.20	0	Planned electrical shutdown
Mo. Totals		17	40	781.2	0.2	0.0	
November	11/5/2022	3	30	141.1	0.03	0.0	Power bump due to weather, VOC was restarted
	11/17/2022	9	8	368.2	0.09	0.0	Unplanned outage, relit
	11/28/2022	8	0	322.5	0.08	0.0	Power outage, relit
Mo. Totals		20	38	831.9	0.2	0.0	
December	12/24/2022	16	30	598.5	0.15	0.0	Downtime not ledgible due to water damage, will over-report to include from the start of the day until the second downtime at 4:30pm that day.
	12/24/2022	5	56	215.2	0.05	0.0	Burners out. Relit.
Mo. Totals		21	86	813.7	0.2	0.0	

2022 SSBO Average Alloy Summary

PCC Structurals Air Contaminant Discharge Permit 03-2674

The following table summarizes the requirements of Conditions 5.5 and 6.2 for calculating and reporting HAP metal poured and associated PM HAP emissions.

Alloy	Average Total HAP Concentration (%)	Average PM HAP Concentration (%)
SSBO Parts	76.55	64.14