

May 16, 2016

Greg Grunow
Oregon Department of Environmental Quality
700 NE Multnomah Street
Portland, OR 97232

**Re: PCC Deer Creek Air Discharge Permit 03-0020-ST-01
NC 028539 Completion Notice--Dust Collection System Enhancements**

Dear Greg:

On 2/19/2016, PCC Structurals, Inc. (PCC) Deer Creek Campus (DC) notified the state of PCC's intent to proceed with upgrades to DC's particulate emission control systems that would provide significant reductions in plant site emissions. The projects included installation of new high performance baghouse controls on the DC torch burnoff booth exhaust and the addition of HEPA after-filters on the DC TiAl baghouse. These projects have now been completed, and, as such, we are submitting the attached AQ104C Completion Notice. As previously stated, adding these controls is beyond anything required by the DEQ air permitting program but is consistent with our goal of continuous improvement.

As we discussed, the actual equipment installed at DC was modified from the original application, and, as agreed, we are submitting revised AQ304 forms to describe the equipment modifications. The two changes from the initial submittal are as follows:

1. In the February 19 submittal, we identified our intent to install a baghouse to control the exhaust from the torch burnoff booth. We have carried through on that commitment and installed a Donaldson Torit baghouse, rated at 99.9% removal efficiency, on this exhaust. However, we have added HEPA filters on the baghouse exhaust that were not identified in the initial submittal. The HEPA filters will provide an additional 99% or greater removal efficiency as compared to what was originally described in the application. This will even further decrease our emissions from what was described in our original notice.
2. In the February 19 submittal, we identified our intent to install HEPA after-filter units made by Donaldson Torit on the exhaust of the TiAl baghouse. The TiAl baghouse was manufactured by Carothers and Sons. After further investigation by our engineers we determined that Carothers and Sons custom made HEPA after-filter units would be a better match to the existing baghouse than after-filter units made by Donaldson Torit.

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Nothing about the expected performance has changed from what we identified. The only change is the manufacturer of the HEPA after-filter units installed on the TiAl baghouse.

Please call me or Sherry Uchytel if you have any questions about this notification or any of the attached documents.

Sincerely,

For PCC STRUCTURALS, INC. by:


A handwritten signature in black ink, appearing to be "Chris Myers", written over a horizontal line.

Chris Myers
Director EHS

NOTICE OF APPROVED CONSTRUCTION COMPLETION

Return this form within 30 days of completion of approved construction

NC Application Number:	028539
Permit Number (if applicable):	03-0200
Company Name:	PCC Structurals, Inc. - Deer Creek
Street Address:	Mail: 4600 SE Harney Drive Physical: *13350 Johnson Rd *NO MAIL
City, State, Zip Code:	Mail: Portland OR 97206 Physical: *Milwaukie OR 97222 *NO MAIL
Contact Person:	Sherry Uchytel
Phone Number:	503-777-7683
Brief description of installed facility/equipment:	Redirect exhaust from Torch Burnoff booth from roof to Baghouse 7677 fitted with HEPA filter. Install HEPA filter on TiAl baghouse 8511. Revised AQ304 forms attached.
Date construction completed:	5/3/2016
Date placed into operation:	5/3/2016
Do you wish to apply for tax credits (yes/no):	No

Signature	
<i>I certify that the information contained in this notice, including any schedules and exhibits attached to the notice, are true and correct to the best of my knowledge and belief.</i>	
Name of official:	Chris Myers
Title of official:	Division EHS Director
Phone number of official:	503-777-3881
Date	5/16/16
Signature of official	

SUBMIT THE COMPLETED NOTICE OF APPROVED CONSTRUCTION COMPLETION FORM TO THE DEPARTMENT REGIONAL OFFICE SHOWN BELOW FOR THE AREA THAT THE SOURCE IS LOCATED:

Oregon Department of Environmental Quality		
Eastern region, Air Quality 475 NE Bellevue Drive, Suite 110 Bend, OR 97701	Northwest Region, Air Quality 700 NE Multnomah Street, Suite 600 Portland, OR 97232	Western Region, Air Quality 4026 Fairview Industrial Drive Salem, OR 97302

**BAGHOUSE
CONTROL DEVICE INFORMATION**

**AQ304
ANSWER SHEET**

Facility Name: PCC Structurals, Inc. TiAl Permit Number: 03-0020

1.	Control Device ID	TiAl Baghouse #8511 HEPA After Filter
2.	Process/Device(s) Controlled	TiAl Metal and Silica from Grinding, Furnace, Cutting and Knock Out Operations
3.	Year installed	2016
4.	Manufacturer/ Model No.	Carothers and Sons, LTD PN7986
5.	Control Efficiency in %	99.97% @ 0.03 micron
6.	Type of cleaning mechanism and frequency	Static
7.	Design inlet gas flow rate (acfm)	27,772 ACFM
8.	Number of bags	15 HEPA filters
9.	Design air-to-cloth ratio	NA
10.	Design pressure drop (inches of water)	1.45 " WC
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	Yes, existing TiAl Baghouse #8511 DEQ NC 27118

1. Enter the control device identification label.
2. Enter the processes and/ or devices controlled by this unit. May use ID labels or descriptions.
3. Enter the year the control device was, or will be installed.
4. Enter the manufacturer and model number of the control device.
5. Enter the rated control efficiency, in percent, for the control device.
6. Describe the baghouse cleaning mechanism (shaker, pulse jet, reverse air, etc.).
Specify the frequency with which cleaning is performed.
7. Enter the design inlet gas flow rate (actual cubic feet per minute).
8. Enter the number of bags that make up the baghouse.
9. Enter the design air to cloth ratio (square feet of total bag surface area divided by air flow).
10. Enter the design pressure drop across the baghouse (inches of water).
11. Describe/List any inlet gas pretreatment systems/devices. If the pretreatment systems are separate control devices, complete the appropriate control device description form for each device.

**BAGHOUSE
CONTROL DEVICE INFORMATION**

**AQ304
ANSWER SHEET**

Facility Name: PCC Structurals, Inc. Deer Creek

Permit Number: 03-0020

1.	Control Device ID	Deer Creek Torch Burn Off Booth Baghouse #7677 with HEPA filter
2.	Process/Device(s) Controlled	Metals from torch cutting
3.	Year installed	2016
4.	Manufacturer/ Model No.	Baghouse: Donaldson Torit / Model DFT2-4 HEPA: PCC custom unit
5.	Control Efficiency in %	Baghouse: minimum 99.9% @ 10.0 micron HEPA: 99.97% @ 0.3 micron
6.	Type of cleaning mechanism and frequency	Baghouse: Pulse Jet – 10 Sec HEPA: Static
7.	Design inlet gas flow rate (acfm)	Baghouse: 10,500 ACFM
8.	Number of bags	Baghouse: 4 filter cartridges HEPA: 4 filters
9.	Design air-to-cloth ratio	7.64 : 1
10.	Design pressure drop (inches of water)	Baghouse: 2-4" WC HEPA: 1-4" WC
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	No

1. Enter the control device identification label.
2. Enter the processes and/ or devices controlled by this unit. May use ID labels or descriptions.
3. Enter the year the control device was, or will be installed.
4. Enter the manufacturer and model number of the control device.
5. Enter the rated control efficiency, in percent, for the control device.
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