PCC Structurals, Inc.

October 25, 2016

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

Re: PCC Large Parts Campus Air Discharge Permit 26-1867-ST-01
Notice of Intent to Construct--Foundry Dust Collection System Enhancements

Dear Greg:

PCC Structurals, Inc. (PCC) Large Parts Campus (LPC) is notifying the state of our intent to proceed with additional upgrades to our particulate emission controls system. PCC has a deep commitment to continuous improvement of our pollution control systems. Consistent with that commitment, we have assessed the LPC Steel foundry building and determined that it would be possible to control particulate emissions from our air casting operations. Therefore, we are adding a new baghouse with HEPA filtration to filter 80,000 cubic feet per minute of air from this production area. We expect this project to commence construction in the upcoming weeks.

The addition of baghouse controls with HEPA after filters to the foundry operations will decrease the amount of metal dust emitted from our processes. As the June 2016 testing of the new Burn-Off baghouse with HEPA demonstrated, the proposed controls have the potential to decrease particulate emissions below the level of detection. While we do not believe that the foundry area was ever a large source of particulate, we still see a material environmental benefit to decreasing the emissions to the negligible level. These improvements are also consistent with the decrease in our particulate Plant Site Emission Limits (PSELs) that we requested of you in November 2015. Adding these controls is beyond anything required by the DEQ air permitting program, but is consistent with our goal of continuous improvement.

Because there are no new emissions generated from the installation of these new control devices, we do not believe that there is any need for a permit modification before the controls are installed and brought on line. Therefore, we believe that these changes may be accomplished through the NOC process and be classified as Type 1 changes.

We have included an AQ104 form for the new foundry controls as well as the related control device form. We have not identified any reductions on page 3 of the AQ104 form as the

emission factors in our permit have yet to be changed. However, as noted above, the new controls should reduce particulate (e.g., metal dust) emissions from this process area to nearly nothing. We anticipate that this will be reflected in our air permit as part of the ongoing renewal process.

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

Sincerely,
For PCC STRUCTURALS, INC. by:

Chris Myers
Director EHS

FOR DEQ USE ONLY	
Permit Number:	Regional Office:
Application No:	Date Received :

1. Permit Number: ACDP 26-1867	
2. Company	**3. Facility Location**
Legal Name: PCC Structurals, Inc.	Name: LPC
Mailing Address: 4600 SE Harney Drive	Street Address: 4600 SE Harney Drive
City, State, Zip Code: Portland OR 97206	City, County, Zip Code: Portland OR 97206
Number of Employees (Corp): 165	Number of Employees: 675
4. Site Contact Person	**5. Standard Industrial Classification Code(s)**
Name: Sherry Uchytil	Primary: 3369
Title: Environmental Specialist II	Secondary: NA
Phone number: 503-777-7683	**6. Type of construction/modification change:** (see instructions) Type 1
Fax number: 503-777-7682	
e-mail address: suchytil@pccstructurals.com	

7. Signature

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.

Chris Myers
Name of official (Printed or Typed)

Director of Environmental, Health and Safety 503-777-7494
Title of official and phone number

Sheryll Uchytil for Chris Myers
Signature of official

10/26/2016
Date

SUBMIT TWO COPIES OF THE COMPLETED NOTICE OF INTENT TO CONSTRUCT TO THE DEPARTMENT REGIONAL OFFICE SHOWN BELOW:
Oregon Department of Environmental Quality
Northwest Region
2020 SW 4th St, #400
Portland, OR 97201

Construction Information

8. Description of proposed construction:

Install foundry dust collection system.

9. Will the construction increase the capacity of the facility? No If yes, how much? NA

10. Will the construction increase pollutant emissions? No

If yes, how much (see question 18)?

11. Will the construction cause new pollutant emissions? No If yes, which pollutants and how much? NA

12. Estimated timing of construction.

a. Commence date: 08/2016
b. Begin date: expect to begin by 11/01/2016
c. Completion date: expect to complete by 12/30/2016

13. Will tax credits be requested once construction is completed? No

14. Attach relevant forms from Form Series AQ200, Device/Process Forms. NA

15. Attach relevant forms from Form Series AQ300, Control Device Description Forms. AQ304

16. Attach process flow diagram. On file

17. Attach a city map or drawing showing the facility location. On file

18. If applicable, attach a Land Use Compatibility Statement. NA

Emissions Data

19. Pre-and Post-Construction emissions summary data

a. Emissions Point	b. Pollutant	c. Pre-Construction Emissions		d. Post-Construction Emissions	
		short-term (specify unit)	Annual (tons/year)	short-term (specify unit)	Annual (tons/year)
LPC	NO_x	NA	59	NA	59
LPC	CO	NA	99	NA	99
LPC	VOC	NA	99	NA	99
LPC	PM	NA	83	NA	83
LPC	PM10	NA	54	NA	54

BAGHOUSE
CONTROL DEVICE INFORMATION

AQ304
ANSWER SHEET

Facility Name: PCC Structurals, Inc. LPC Permit Number: 26-1867

1.	Control Device ID	LPCS Foundry Baghouse with HEPA filtration #9256
2.	Process/Device(s) Controlled	Metals from foundry
3.	Year installed	2016
4.	Manufacturer/ Model No.	Primary: Donaldson DFE 4-192 HEPA: Filtration Group #41638HC with Donaldson ULTRA-LOK HEPA filters, (4) 3X4, (1) 2X4
5.	Control Efficiency in %	Primary Cartridges: 99.9% @ PM 10 HEPA filters: 99.97% @ PM 10, PM 0.3
6.	Type of cleaning mechanism and frequency	Primary: Reverse Pulse HEPA: Static
7.	Design inlet gas flow rate (acfm)	80,000 ACFM
8.	Number of bags	Primary: 192 each HEPA: 56 each
9.	Design air-to-cloth ratio	Primary: 1.64:1 HEPA: 1,428 each
10.	Design pressure drop (inches of water)	Primary: 6" WC HEPA: 2" WC
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	N/A

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.