PCC Structurals, Inc.

February 19, 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
Notice of Intent to Construct--Dust Collection System Enhancements

Dear Greg:

PCC Structurals, Inc. (PCC) Deer Creek Campus (DC) is notifying the state of our intent to proceed with upgrades to our particulate emission controls system. Consistent with our discussions last fall related to Large Parts Campus (LPC), PCC has been working on the engineering associated with improving our particulate controls systems at DC. The following two projects covered by this construction approval application: (1) install new high performance baghouse controls on the DC torch burnoff booth exhaust, (2) add HEPA after-filters on the DC TiAl baghouse. We expect these projects to commence construction in the upcoming weeks.

The addition of these baghouse controls will decrease the amount of metal dust emitted from our processes at DC. We believe that the new baghouse controls will achieve a 99.9% or greater reduction particulate metal emissions. Adding the HEPA after-filters to the existing TiAl baghouse will offer an additional 99% or greater collection efficiency on top of that already achieved. 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 upgrades as well as the related control device forms. 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 actual reduction in particulate (e.g., metal dust) emissions will be significant. We anticipate that this will be reflected in our air

permit as part of the ongoing renewal process. We will submit a revised emission inventory to you under separate cover that reflects the new devices and the associated emission factors.

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

Print Form

NOTICE OF INTENT TO CONSTRUCT

FORM AQ104
ANSWER SHEET

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

1. Source Number: ACDP 03 0020	
2. Company Legal Name: PCC Structurals Inc Ownership type: Corporation	**3. Facility Location** Name: Deer Creek Plant start date: 1997
Mailing Address: 4600 SE Harney Drive	Street Address: 13350 SE Johnson Rd (NO MAIL RECEIVED HERE)
City, State, Zip Code: Portland OR 97206	City, County, Zip Code: Milwaukie OR 97222 (NO MAIL RECEIVED HERE
Number of Employees (corporate): 45	Number of Employees (plant site): 310

4. Site Contact Person Name: Sherry Uchytil	**5. Industrial Classification Code(s)** SIC: 3369 NAICS:
Title: Environmental Specialist 2	
Phone number: 503-777-7683	**6. Type of construction/change:** (see instructions)
Fax number: 503-777-7682	Type 1
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	Division EHS Director 503-777-7494
Name of official (Printed or Typed)	Title of official and phone number
	2/19/2016
Signature of official	Date

SUBMIT TWO COPIES OF THE COMPLETED NOTICE OF INTENT TO CONSTRUCT TO THE DEPARTMENT REGIONAL OFFICE SHOWN BELOW:

Oregon Department of Environmental Quality
Western Region
750 Front Street NE, Suite 120
Salem, OR 97301

Construction Information

8. Description of proposed construction:

1. Redirect the current unabated exhaust from the Deer Creek Torch Burnoff Booth from the roof into a new baghouse.

2. Install HEPA filters to existing TiAluminide Baghouse #8511

Baghouses provide a minimum 99.9% PM10 removal efficiency.
HEPA filters provide a minimum 99.97% PM 10, PM 0.3 removal efficiency.

9. Will the construction increase the capacity of the facility? N If yes, how much?

10. Will the construction increase pollutant emissions? N If yes, how much (see question 18)?

11. Will the construction cause new pollutant emissions? N If yes, which pollutants and how much?

12. Estimated timing of construction.

a. Commence date: 2/19/2016
b. Begin date: 3/7/2016
c. Completion date: 4/30/2016

13. Will tax credits be requested once construction is completed? N

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

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

16. Attach process flow diagram.

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

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

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)
	PM	NA	24	NA	24
	PM10	NA	14	NA	14
	CO	NA	99	NA	99
	NOx	NA	39	NA	39
	VOC	NA	39	NA	39
	VOC HAP	NA	9	NA	9
	Other HAP	NA	9	NA	9
	PM HAP	NA	9	NA	9
	Aggregate HAP	NA	24	NA	24

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.	Donaldson Torit (2) Ultralock 2HX4W
5.	Control Efficiency in %	99.97% @ PM 10, PM 0.03
6.	Type of cleaning mechanism and frequency	Static
7.	Design inlet gas flow rate (acfm)	27.772 ACFM
8.	Number of bags	16 HEPA filters
9.	Design air-to-cloth ratio	NA
10.	Design pressure drop (inches of water)	2-3"WC
11.	Inlet gas pretreatment? (yes/no) If yes, list control device ID and complete a separate control device form	Yes, existing Baghouse #8511 See DEQ NC 27118, 11/2012

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
2.	Process/Device(s) Controlled	Metals from torch cutting
3.	Year installed	2016
4.	Manufacturer/ Model No.	Donaldson Torrit / Model DFT2-4
5.	Control Efficiency in %	99.9 % @ PM 10
6.	Type of cleaning mechanism and frequency	Pulse Jet – 10 Sec
7.	Design inlet gas flow rate (acfm)	10,500 ACFM
8.	Number of bags	4 Ultra Web Cartridges
9.	Design air-to-cloth ratio	7.64 : 1
10.	Design pressure drop (inches of water)	2-4"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.
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).
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