

February 19, 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--Dust Collection System Enhancements**

Dear Greg:

PCC Structurals, Inc. (PCC) Large Parts Campus (LPC) is notifying the state of our intent to proceed with upgrades to our particulate emission controls system. As we discussed in relation to the permit renewal documents that we submitted to you in November 2015, PCC has been working on the engineering associated with improving our particulate controls systems at LPC. We are now proceeding with the installation of baghouse controls on the Cheetah saw and burnoff operations at the LPC steel operations (LPCS). We are also proceeding with the addition of HEPA after-filters on the two LPCS ASC baghouses (ingot grinding cell and ingot robot cell), the LPCS Donaldson Day baghouse and the LPCS grinding baghouse. Finally, we are adding a cyclone upstream of the gritblast baghouse to reduce inlet load and enhance baghouse filtration performance. We expect these projects to commence construction in the upcoming weeks.

The addition of baghouse controls to the LPCS burnoff and Cheetah saw operations and addition of HEPA after-filters on the four existing baghouses will decrease the amount of metal dust emitted from our processes. We believe that the new baghouse controls will achieve a 99.9% or greater reduction particulate metal emissions from the LPCS burnoff and Cheetah saw processes. Adding the cyclone at the inlet to the gritblast baghouse will improve that baghouse's already strong performance and filter life. Adding the HEPA after-filters to the two ASC baghouses, the LPCS Donaldson Day baghouse and the LPCS grinding baghouse will offer an additional 99% or more collection efficiency on top of that provided by the four existing baghouses. We anticipate that the HEPA after-filters will reduce emissions of metal dust from these baghouses to a few pounds per year. These actions are consistent with the decrease in our particulate Plant Site Emission Limits (PSELs) that we requested of you in November. 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

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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 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

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

<b>1. Permit Number:</b> <u>ACDP 26-1867</u>	
<b>2. Company</b>	<b>3. Facility Location</b>
Legal Name: <u>PCC Structurals, Inc.</u>	Name: <u>Large Parts Campus (LPC)</u>
Mailing Address: <u>4600 SE Harney Drive</u>	Street Address: <u>4600 SE Harney Drive</u>
City, State, Zip Code: <u>Portland OR 97206</u>	City, County, Zip Code: <u>Portland OR 97206</u>
Number of Employees: <u>967</u>	
<b>4. Site Contact Person</b>	<b>5. Standard Industrial Classification Code(s)</b>
Name: <u>Sherry Uchytıl</u>	Primary: <u>3369</u>
Title: <u>Environmental Specialist 2</u>	Secondary: <u>NA</u>
Phone number: <u>503-777-7683</u>	<b>6. Type of construction/modification change:</b> (see instructions) <u>Type I</u>
Fax number: <u>503-777-7682</u>	
e-mail address: <u>suchytıl@pccstructurals.com</u>	

<b>7. Signature</b>	
<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>	
Chris Myers _____	EHS Director <u>503-777-7494</u>
Name of official (Printed or Typed)	Title of official and phone number
 _____	<u>2/19/14</u> _____
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  
Northwest Region  
2020 SW 4<sup>th</sup> St, #400  
Portland, OR 97201

**Construction Information**

## 8. Description of proposed construction:

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Install a new baghouse equipped with HEPA filters to control emissions from LPCS Torch Burnoff Booths and Cheetah Saw exhausts.

Install HEPA filters on 4 existing baghouses that service metal cutting, grinding, and shotblasting operations.

Install a cyclone upstream of LPC Gritblast Baghouse #8687 (NC 027482, 7/2013).

Baghouses provide a minimum 99.9% removal efficiency for PM 10.

HEPA filters provide a minimum 99.97% removal efficiency for PM 10, PM 0.3

The cyclone will reduce inlet loading to the existing Gritblast baghouse which will reduce the amount of dust collected at the baghouse.

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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: 02/8/2016
  - b. Begin date: 03/01/2016 (approximate)
  - c. Completion date: expect to complete installations from 03/31/2016 through 7/1/2016 (approximate)
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. See attached AQ304 forms
16. Attach process flow diagram. On file at DEQ
17. Attach a city map or drawing showing the facility location. On file at DEQ
18. If applicable, attach a Land Use Compatibility Statement. NA



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

1.	Control Device ID	LPCS Torch Burnoff Booths & Cheetah Saw Baghouse with HEPA filter #TBD
2.	Process/Device(s) Controlled	Metals from torch cutting and saw cutting metal castings
3.	Year installed	2016
4.	Manufacturer/ Model No.	Donaldson Torit Baghouse: (Qty-2) Model DFE 5-180 Donaldson Torit HEPA filters (Qty-6) 3HX4W Ultra-Lok HEPA after filters
5.	Control Efficiency in %	Baghouse Cartridges: 99.9% @ PM 10 HEPA filters: 99.97% @ PM 10, PM 0.3
6.	Type of cleaning mechanism and frequency	Baghouse: Pulse Jet cartridges HEPA filter: Static
7.	Design inlet gas flow rate (acfm)	130,000 ACFM each
8.	Number of bags	Baghouse: 360 cartridges. HEPA Filters: 72 filters
9.	Design air-to-cloth ratio	Baghouse: 1.42 : 1 HEPA filters: NA
10.	Design pressure drop (inches of water)	Baghouse cartridges: 6 " WC, HEPA filters: 2" 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).
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. LPC Permit Number: 26-1867

1.	Control Device ID	ASC Baghouse #8901 HEPA Afterfilter
2.	Process/Device(s) Controlled	Metals from ingot grinding
3.	Year installed	2016
4.	Manufacturer/ Model No.	Donaldson Torit / Model 1HX2W Ultra-Lok HEPA housing with filters
5.	Control Efficiency in %	99.97% @ PM 10, PM 0.3
6.	Type of cleaning mechanism and frequency	Static
7.	Design inlet gas flow rate (acfm)	3000 ACFM
8.	Number of bags	2 HEPA Filters
9.	Design air-to-cloth ratio	N/A
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 #8901 See DEQ NC 27785 6/2014

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. LPC Permit Number: 26-1867

1.	Control Device ID	ASC Baghouse #6532 HEPA Afterfilter
2.	Process/Device(s) Controlled	Metals from ASC Robot ingot grinding and shotblasting
3.	Year installed	2016
4.	Manufacturer/ Model No.	Donaldson Torit / Model IHX3W Ultra-Lok HEPA housing with filters
5.	Control Efficiency in %	99.97% @ PM 10, PM 0.3
6.	Type of cleaning mechanism and frequency	Static
7.	Design inlet gas flow rate (acfm)	6000 ACFM
8.	Number of bags	3 HEPA Filters
9.	Design air-to-cloth ratio	N/A
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 #6532 See DEQ NC 020286 7/2003

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. LPC Permit Number: 26-1867

1.	Control Device ID	LPCS Grinding Baghouse #6417 HEPA Afterfilter
2.	Process/Device(s) Controlled	Metals from grinding castings
3.	Year installed	2016
4.	Manufacturer/ Model No.	Donaldson Torit / Model 3HX4W Ultra-Lok HEPA housing with filters
5.	Control Efficiency in %	99.97% @ PM 10, PM 0.3
6.	Type of cleaning mechanism and frequency	Static
7.	Design inlet gas flow rate (acfm)	20,000 ACFM
8.	Number of bags	12 HEPA Filters
9.	Design air-to-cloth ratio	N/A
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 #6417 See DEQ NC 018273 11/2000

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. LPC Permit Number: 26-1867

1.	Control Device ID	LPCS Donaldson Day Baghouse #5549 HEPA Afterfilter
2.	Process/Device(s) Controlled	Metals from grinding castings
3.	Year installed	2016
4.	Manufacturer/ Model No.	Donaldson Torit / Model 2HX4W Ultra-Lok HEPA housing with filters
5.	Control Efficiency in %	99.97% @ PM 10, PM 0.3
6.	Type of cleaning mechanism and frequency	Static
7.	Design inlet gas flow rate (acfm)	12,000 ACFM
8.	Number of bags	8 HEPA Filters
9.	Design air-to-cloth ratio	N/A
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 #5549 See DEQ NC 027518 11/2013

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.