

AIR CONTAMINANT DISCHARGE PERMIT ADDENDUM

Department of Environmental Quality
Northwest Region
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Portland, Oregon 97201-4987
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Issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

PCC Structural, Inc.
4600 S.E. Harney Drive
Portland, OR 97206

PLANT SITE LOCATION:

Johnson Creek Complex
4600 S.E. Harney Drive
Portland, Oregon

INFORMATION RELIED UPON:

VOC RACT Analysis
Submitted: May, 1993

Supplementary Information
Submitted: May, 1994

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY:

Tom Bispham

Tom Bispham, Northwest Region Administrator

APR 04 1997

Dated

ADDENDUM NO. 2

RACT Requirements

19. By no later than one year after notification by the Department of approval by the EPA of the source specific RACT determination, the permittee shall provide controls to reduce the VOC emissions from the Large Parts Campus Steel and Titanium (LPC-S and LPC-T) investment casting operations by a minimum of 90 percent.

(This condition is included in the Oregon State Implementation Plan (SIP). Any changes to this condition must be submitted as SIP revisions.)

20. By no later than 90 days after the notification of EPA approval, the permittee shall submit to the Department a final control strategy concerning the VOC emissions from the investment casting operations. The plan shall include a schedule and dates of the project interim steps leading up to the compliance date specified in Condition 19. above. The emission reductions may be demonstrated by the source testing required by Conditions 16. and 17. in the existing permit, or an alternative plan that is approved by the Department.

(This condition is included in the Oregon State Implementation Plan (SIP). Any changes to this condition must be submitted as SIP revisions.)

21. In order to calculate compliance with Condition 19., the permittee may average the destruction and removal efficiency of all its investing rooms using VOC containing slurries. Any investing room for which the VOC content of the slurries used is less than 2% (not including water) VOC on a weighted average basis shall be exempt from RACT and this condition's compliance calculation.

(This condition is included in the Oregon State Implementation Plan (SIP). Any changes to this condition must be submitted as SIP revisions.)

Department of Environmental Quality
 Air Quality Division

AIR CONTAMINANT DISCHARGE PERMIT APPLICATION REVIEW REPORT

Dura Industries, Inc.
 P.O. Box 10762
 Portland, OR 97210

PSEL CRED	SOURCE TEST	CMS	AMB MON	COMPL SCHED	SPEC COND	REPORT A Q M	EXCESS R N	NSPS	NSR	PSD	NESHAPS	SIZE A1 A2	PUBL NOTE
				X	X	X	X					X	X

This permit review is conducted in two parts. First (I), the facility and its emissions sources are evaluated. The key emission points are identified and the appropriate regulatory standards are determined. The second part (II) consists of the alternate RACT determination.

I. THE FACILITY REVIEW

GENERAL BACKGROUND INFORMATION

1. Dura Industries, Inc. operates a surface coating facility located at 4466 NW Yeon, Portland, Oregon, 97210. Dura paints aluminum extrusion parts used in the construction of commercial buildings, and the coatings applied to these extrusion parts are subject to the high performance architectural coatings (HPAC) standard (OAR 340-22-170 (5)(j)(E)) of 3.5 lbs VOC per gallon of coating, less water. The coatings applied to other miscellaneous parts are subject to OAR 340-22-170 (5)(j)(A) through (D).
2. The source is located in a nonattainment area for ozone, and is a minor source (< 40 tons/yr) of ozone precursor Volatile Organic Compounds (VOC). All other criteria pollutants are emitted from this source in insignificant amounts.
3. A Land Use Compatibility Statement signed by City of Portland on 11/14/88 granted unconditional approval.
4. Other permits issued or required by the Department of Environmental Quality for this source include a registration as a hazardous waste generator.

(Pages 2+3 completely
crossed out.)

Crossed out or here not to be included

OTHER CONDITIONS

13. The source is required to submit reports to the Department annually as specified in the permit.
14. The source is not subject to immediate (within one hour) reporting of excess emissions, except when the emissions may endanger public health.
15. This source is not subject to federal regulations for New Source Performance Standards (NSPS), Prevention of Significant Deterioration (PSD), National Emissions Standards for Hazardous Air Pollutants (NESHAPS), or New Source Review (NSR).

II. THE ALTERNATE RACT DETERMINATION

Pursuant to a source-specific State Implementation Plan (SIP) revision criteria cited in OAR 340-22-170 (3), this permit proposes to exempt Dura Industries Inc. from meeting the high performance architectural coatings (HPAC) standard (OAR 340-22-170 (5) (j) (E)) of 3.5 lbs VOC per gallon of coating, less water, and in its place establishes the alternative emission limit. The exception to the Reasonably Available Control Technology (RACT) standard is proposed in this permit mainly because (1) high performance architectural coatings are not currently available and (2) the cost of control is considered to be excessive for this source.

The proposed alternative RACT limit need not be adopted by the Oregon Environmental Quality Commission (EQC) prior to EPA approval as the provision is a part of the RACT coating rule. The alternative RACT limit in this permit is submitted directly to EPA, and it will not become effective until approved by EPA. The permit issuance will follow the procedural requirements of 40 CFR Part 51.102, which covers the public hearing processes.

BACKGROUND INFORMATION

16. OREGON - RACT SURFACE COATING STANDARDS: The surface coating RACT standards (OAR 340-22-170) in Oregon are currently divided into 20 categories to cover a wide range of industrial coating applications; from (a) automobile to (z) zinc coating operations, except the aerospace coating applications. The primary intent behind the surface coating rules is to reduce the pollutants from the front-end by restricting the solvent (VOC) contents in coatings. The concept has worked for the most part, but in certain coating categories such as the architectural coatings, the compliant coating remains unavailable.
17. THE ARCHITECTURAL COATING UNIQUENESS: Dura Industries, Inc. coats exterior aluminum panels and extrusion parts for (highrise) commercial buildings. The paint finish must meet the America Architectural Manufacturing Association (AAMA) specification 605.2, which requires