REGION 10
SEATTLE, WA 98101

May 1, 2024

Mr. Paul Fujii
Officer
Neucor, Inc.
1203 South Nevada Street
Seattle, Washington 98108

Mr. Ed Surdyk
Operations Manager
Neucor, Inc.
2045 NE Hollowtree Lane
Bend, Oregon 97701

Dear Messrs. Fujii and Surdyk:

The U.S. Environmental Protection Agency is writing with respect to a Clean Air Act title V application filed by Neucor, Inc. ("Neucor") in May 2017, regarding the facility located at 3592 Wesley Road in White Swan, Washington. Additional information as explained herein is necessary to evaluate the application. If the EPA does not receive the additional information within 60 days of your receipt of this request, Neucor may no longer operate the facility without a title V permit.[1]

Wood-Fired Boiler #1 & Production Line 2

A title V permit must include all applicable requirements, including any term or condition of a preconstruction permit. The EPA issued preconstruction minor NSR permit R10TNSR00200 to Neucor on April 19, 2016, authorizing the re-start of a shutdown facility. Neucor indicated in its title V application that the facility commenced operations on May 5, 2016. The minor NSR permit contains several requirements including those applicable to Wood-Fired Boiler #1 (BLR1) and five emission units operating exclusively in support of Production Line 2. These emission units include Dryer #2 (D2) controlled by baghouse D2, Blender/Former #2 (LF2) controlled by baghouse F2, Press #2 (P2), Board Cooler #2 (C2), and Material Recycling Line 2 (MR2S) controlled by baghouse BH2. Since issuance of the minor NSR permit, Neucor reported no emissions for the six emission units noted above in its annual emission reports, indicating that none of the six emission units have been operated by Neucor.

[1] See 40 CFR 71.5(a)(2) and 71.7(b).

Pursuant to minor NSR permit Condition 3.1, "The Permittee shall not operate production line 2 unless the exhaust from line 1 dryer cyclone and line 2 dryer cyclone are controlled by baghouses designed to meet the emission limits in Table 3-3." Pursuant to minor NSR permit Condition 3.2.1, Neucor is prohibited from operating BLR1 unless "[t]he exhaust from any operating dryer cyclone is controlled by a baghouse designed to meet the emission limits in Table 3-3." The EPA has not received notice from Neucor that baghouses have been installed on D1 and D2 dryer cyclones exhausts. See minor NSR permit Condition 5.1.

Condition 2.9 of the minor NSR permit states:

> This permit becomes invalid if construction is not commenced within 18 months after the effective date of this permit, if construction is discontinued for 18 months or more, or if construction is not completed within a reasonable time. The EPA may extend the 18-month period upon a satisfactory showing that an extension is justified. This provision does not apply to the time period between the approved phases of a phased construction project; you must commence construction of each such phase within 18 months of the projected and approved commencement date.

For the EPA to determine whether the minor NSR permit remains valid for any of the six emission units (BLR1, D2, LF2, P2, C2, and MR2S), and whether the terms are applicable requirements to include in the title V permit, please provide responses to the following questions for each of the emission units:

1. Has Neucor operated the emission unit?
2. If the answer to Question 1 is "yes", fully explain the circumstances of each operation event (e.g., purpose, date, duration, and estimated cost).
3. Has Neucor conducted activities to prepare the emission unit for operation?
4. If the answer to Question 3 is "yes", fully explain the circumstances of each activity (e.g., purpose, date, duration, and estimated cost).
5. Question specific to D1 & D2: Has Neucor installed baghouses on D1 and D2 dryer cyclones exhausts?

<u>Source Test Reports</u>

Minor NSR permit Conditions 4.10, 4.11, and 4.12 require Neucor to conduct source testing within 180 days of beginning operation of Production Line 1. Based on information presented in Neucor's title V application and annual emission reports, Production Line 1 re-started in 2016. Minor NSR permit Condition 5.4 states, "Emission test reports shall be submitted to EPA within 60 days of completing any emission test required by this permit along with items required to be recorded during the test." The EPA's review of emission measurements and associated operating records will enable the EPA to evaluate whether applicable requirements are sufficient to assure compliance with emission limitations.[2]

The EPA has reviewed our repository of files for Neucor, and we cannot locate any emission test reports submitted by Neucor. If the source testing has been conducted and reports generated, please provide a digital copy of the reports to the EPA in response to this request. If the reports were

[2] See 40 CFR 71.6(c)(1).

previously submitted to the EPA, please specify the date(s) and the manner (i.e., hard copy to a mailing address, digitally to CEDRI, digitally to an e-mail address) in which those reports were submitted. If the source testing has not been conducted, please fully explain why not.

Email responsive information requested herein to Dan Meyer of my staff at meyer.dan@epa.gov within 60 days of your receipt of this request. When submitting the information, please certify that the information being provided is true, accurate and complete using the Certification of Truth, Accuracy and Completeness (CTAC) form prepared by the EPA and available online for download in either Microsoft Word (https://www.epa.gov/system/files/documents/2024-03/certification-of-truth-accuracy-and-completeness_5900-02_0.doc) or Adobe Acrobat (https://www.epa.gov/system/files/documents/2024-03/certification-of-truth-accuracy-and-completeness_5900-02.pdf) format. Email the completed CTAC form with the responsive information.

If you have any questions regarding this request for information needed to process Neucor's title V application, please contact Mr. Meyer at (206) 553-4150 or meyer.dan@epa.gov.

Sincerely,

DAVID BRAY Digitally signed by DAVID BRAY Date: 2024.05.01 11:51:05 -07'00'

David Bray
Acting Manager
Air Permits, Toxics, Transportation
and Communities Branch
Air and Radiation Division

cc: Ms. Elizabeth Sanchey
Manager, Yakama Nation Environmental Management Program

Ms. Katie Swan
Air Quality Specialist, Yakama Nation Environmental Management Program