



Invitation for Public Comment

Proposed Renewal of an Oregon Title V Operating Permit for Gunderson LLC

Public Comments Accepted:

March 23, 2007 until 5pm April 30, 2007

Permit # 26-2944

What is being proposed?

DEQ is planning to renew an air permit for Gunderson LLC and is inviting public comment on the proposed permitting action. During the comment period the public is invited to make comments related to specific conditions within the proposed permit. Large industrial sources of air pollution such as Gunderson LLC are required to have an air quality permit issued by DEQ, which is referred to as a Title V permit. Permits are issued by DEQ to regulate the type and amount of air emissions at a regulated facility. Oregon law requires facilities with a Title V permit to renew that permit every five years. Upon renewal, this permit will be effective for five years. Changes to the emission limits in the renewal permit include eliminating the emission limits for Carbon Monoxide and Sulfur Dioxide based on current regulation; as well as adjusting the VOC emissions from 641 tons to 460 tons per year based on current unassigned emissions regulation. As well, the NO_x emission limit is being set at the generic PSEL level based on current regulation. The only significant change to the permit is the addition of new conditions to implement the federal regulations for National Emissions Standards for Hazardous Air Pollutants (NESHAPS) for surface coaters of miscellaneous metal parts and products, 40 CFR Part 63 Subpart M, which was promulgated in 2004. This facility is subject to the NESHAP because it is an existing major source of Hazardous Air Pollutants (HAP), which conducts general use coating operations that emit less than 100 tons per year of HAP emissions.

Where is the facility located?

The facility is located **4350 NW Front Avenue; Portland, OR 97210**

What does Gunderson LLC do that affects air quality?

Gunderson LLC manufactures railroad cars and marine barges. The primary processes occurring at this facility include cutting steel with plasma and gas flame burning machines; sandblasting steel with steel shot and grit blast media; welding using flux core, gas metal and shielded arc welding types; and painting and stenciling railcars using high-solids Volatile Organic Compounds (VOC) compliant coatings. The primary emissions from the facility are VOCs from surface coating. The facility currently has four baghouses on site, which function as air pollution control devices. The criteria pollutants (Particulate Matter, Small Particulate Matter, and VOCs) emissions are in such quantities that Oregon law requires the emissions to be regulated and monitored. There are specific permit conditions that limit what is emitted into the air, including Hazardous Air Pollutants.

Meeting Air Quality Standards

Air quality in Portland meets the standards established by the US Environmental Protection Agency (EPA) to protect public health. DEQ has determined that the air emissions from the Gunderson LLC facility will not result in a violation of those standards. DEQ is responsible for ensuring that the emission limits established by the facility's permit are not exceeded.

What pollutants are measured to determine limits?

EPA and DEQ use six key pollutants as indicators of air quality. These are known as "criteria pollutants" and are pollutants for which emission limits are established if emissions are greater than a regulated minimum level.



State of Oregon
Department of
Environmental
Quality

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Documents may be viewed at the DEQ office listed above, and at:

Northwest Branch Library
2300 NW Thurman Street
Portland, OR 97210
(503) 988-5560

To schedule a review appointment:

Susan Curry at (503) 229-5554

To View the public notice and draft permit on line, click on the links below:

[Draft Permit](#)

[Draft Review Report](#)

Comments due by: April 30, 2007, 5pm

DEQ is committed to accommodating people with disabilities. Please notify us with any specific needs, including alternate formats, to assist your review or to make comments.

Permit emission limits

The table below presents the maximum allowable emissions for the facility. The Current Emission Limit reflects the maximum amount of emissions the facility can currently emit under their existing permit. The Proposed Emission Limit reflects the maximum amount of emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than the maximum limits established in a permit; however, actual emissions can increase up to the permitted limited.

Criteria Pollutants	Current Emission Limit (tons/yr)	Proposed Emission Limit (tons/yr)
Particulate Matter (PM)	148	148
Small Particulate Matter (PM ₁₀)	112	112
Nitrogen Oxides (NO _x)	4	39
Sulfur Dioxide (SO ₂)	1	---
Carbon Monoxide (CO)	1	---
Volatile Organic Compounds (VOC)	641	460

What other DEQ permits are required?

This facility is registered as a generator of hazardous waste and also has a NPDES storm water pollution control permit.

What is Gunderson LLC's compliance history?

DEQ inspects this facility on a regular schedule, with the most recent inspection occurring on September 26, 2006, and have found them to be in compliance with all permit conditions. The facility was also inspected on April 30, 2004 and July 16, 2002 and found them to be in compliance with all permit conditions at that time as well. A violation occurred on September 15, 2000 when the Department issued Gunderson LLC a Notice of Noncompliance for failure to submit their Title V renewal application in a timely manner. These violations were referred to the Department's Enforcement Section with a recommendation for civil penalty. A civil penalty was assessed. The most recent violation, which occurred during the July – December 2006 reporting period, was confirmed by the Department on March 6, 2007 for using a paint during that time which exceeded the VOHAP limit of a coating under the federal NESHAP Marine MACT standard, Subpart II. A warning letter was sent on March 9, 2007 and will be referred to the Department's Enforcement Section. There are no other active enforcement actions or air quality complaints on record for Gunderson LLC.

Are there any special considerations associated with this permit?

- (i) The facility has estimated emissions of Hazardous Air Pollutants for the current normal year as follows: acetaldehyde, 0.012 tons per year (tpy); acrolein, 0.005 tpy; benzene, 0.006 tpy; chromium compounds, 0.01 tpy; cobalt compounds, 0.003 tpy; ethyl benzene, 3.03 tpy; formaldehyde, 0.014 tpy; glycol ethers, 0.94 tpy; manganese compounds, 3.4 tpy; methyl isobutyl ketone, 0.08 tpy; methanol, 3.26 tpy; naphthalene, 0.084 tpy; nickel compounds, 0.01 tpy; polycyclic organic matter, 0.092 tpy; toluene, 66.8 tpy; xylene, 81 tpy.
- (ii) This facility is located in a maintenance area for carbon monoxide and ozone; it is also classified as an area that is in attainment for PM, PM₁₀, SO₂, and NO_x. This facility is a significant source VOCs and a minor source of NO_x, which are both precursors of ozone. This facility is also a significant source of PM, and PM₁₀, but is a minor source of SO₂ and CO.



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How do I participate?

DEQ welcomes your questions and comments. A copy of the proposed permit, permit application, and related documents are available at our Northwest Region office, the draft permit may be viewed at the Multnomah County Library, Northwest Branch or online at <http://www.oregon.gov/deq/>. You may also contact us directly. See contact information, mailing address, e-mail address, fax number and library location in the side bar on first page. A contact person and phone number are available for making an appointment for viewing the application and draft permit. Written comments are due by 5:00 p.m. on April 30, 2007. We accept comments in writing, by e-mail, or in person during the scheduled public hearing. If there is a delay between servers and e-mails and the e-mails are not received before the deadline, they cannot be accepted.

DEQ will schedule a public hearing if requested by 10 or more people, or by an authorized person representing an organization of at least 10 people.

What happens next? After the comment period closes, DEQ will consider all comments received. DEQ may modify provisions in the proposed permit based upon comments received. **Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit following EPA review.**