



Invitation for Public Comment

Re-notification of the public notice for the Proposed Renewal of an Air Permit for Northwest Pipe Company Public Comments Accepted: Comments accepted until February 7, 2007, 5pm

Reason for re-notification: On December 22, 2006 a legal ad appeared in the Oregonian newspaper, but the display ad was not published as is our standard practice. Therefore the agency is re-noticing this public notice and extending the public comment period until February 7, 2007, 5pm.

Permit # 26-2492

What is being proposed?

DEQ is planning on renewing an air permit for Northwest Pipe Company 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. Industrial sources of air pollution such as Northwest Pipe Company 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. 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 coating 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. The only changes to the emission limits in the renewal permit are adjusting the emission limits for Carbon Monoxide and Sulfur Dioxide to zero based on current regulation.

Where is the facility located?

The facility is located at 12005 N. Burgard; Portland, Oregon 97203.

What does Northwest Pipe Company do that affects air quality?

Northwest Pipe Company manufactures spiral and straight seam metal pipe. Steel sheets are formed into pipe, fluxed and welded, cleaned by blasting, and coated. Each job is specific to customer needs. Air pollution sources at the facility includes emissions from solvents in the pipe coatings, smoke/fume from coal tar application, particulate matter from blasting and cement handling, and fugitive dust from vehicle traffic. The facility has the following air pollution control devices on site: six baghouses, three cyclones, three demisters, and one UV filter unit. The criteria pollutants (Particulate Matter, Small Particulate Matter, Nitrogen Oxides, Sulfur Dioxide, Carbon Monoxide, and Volatile Organic Compounds) 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.

DEQ Office location and mailing address:

2020 SW Fourth Ave.,
Suite 400
Portland, Oregon 97201

Toll Free: 1-800-452-4011

Web Site:

<http://www.deq.state.or.us/news/public/index.asp>

Technical Contact:

Patricia Huback
503-229-5534
huback.patricia@deq.state.or.us

Permit Coordinator:

Catherine Blaine
(503) 229-5582
blaine.catherine@deq.state.or.us

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

St. Johns Branch Library
7510 N Charleston Ave.
Portland, Oregon 97203
(503) 988-5397

Mail to:

DEQ – Northwest Region
AQ Permit Coordinator
2020 SW Fourth Ave.,
Suite 400
Portland, Oregon 97201

E-Mail to

Blaine.catherine@deq.state.or.us

FAX: (503) 229-6945

Comments due by:

February 7, 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.

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 Northwest Pipe Company 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.

Criteria Pollutants	Current Emission Limit (t/yr)	Proposed Emission Limit (t/yr)
Particulate Matter (PM)	73	73
Small Particulate Matter (PM ₁₀)	28	28
Nitrogen Oxides (NO _x)	39	39
Sulfur Dioxide (SO ₂)	39	---
Carbon Monoxide (CO)	99	---
Volatile Organic Compounds (VOC)	247	247

Permit emission limits

The table above 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 limit.

What other DEQ permits are required?

Other permits issued to this source by the Department include a stormwater discharge general permit and a permit for the discharge of non-contact cooling water.

What is Northwest Pipe Company's compliance history?

DEQ inspects this facility on a regular schedule and have found them to be out of compliance with various permit conditions in the past. An inspection on September 15, 2004 found the facility to be out of compliance with the recordkeeping requirement for visual inspections of fugitive emissions. A Notice of Noncompliance was issued to Northwest Pipe Company for failure to maintain proper visual emission records. The inspection found the facility was operating in compliance with other requirements. The Department conducted another inspection of the facility on September 12, 2006 and found the facility to be operating out of compliance with recordkeeping permit conditions. On September 20, 2006, the Department issued Northwest Pipe Company a warning letter for the recordkeeping violations that was discovered during the September 12, 2006 inspection. The facility was in compliance with all other requirements. Currently, there are no active enforcement actions on record for Northwest Pipe Company. There are no air quality complaints on record for Northwest Pipe Company.

In addition, the permittee failed to submit their Title V renewal application in a timely manner. On July 12, 2006, the Department issued Northwest Pipe Company a Warning letter for failure to file a timely application for an Oregon Title V Operating Permit. An application was subsequently received.

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: ethylbenzene, 1.0 tons per year (tpy); methylene chloride, 9.0 tpy; carbon tetrachloride, 0.01 tpy; xylene, 4.8 tpy; toluene, 0.9 tpy;



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formaldehyde, 0.01 tpy; 4,4'-methylene diphenyl diisocyanate (MDI), 0.1 tpy; powered activated carbon (PAC), 0.03 tpy; methyl ethyl ketone, 3.4 tpy; phenanthrene, 0.03 tpy; manganese, 0.9 tpy.

- (ii) This source is located in a maintenance area for ozone, and is a significant source of VOCs and NO_x, which are both precursors of ozone. The source is also located in a maintenance area for carbon monoxide and is a significant source of that pollutant.

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 and the St. Johns Library, 7510 N. Charleston Avenue, Portland, OR. or online at <http://www.deq.state.or.us/news/public/index.asp>. You may also contact us directly. See contact information at right on first page, for more information. Written comments are due by 5:00 p.m. on February 7, 2007, 5pm.. We accept comments in writing, by e-mail, or in person during the scheduled public hearing. Please take into account any delays between servers so that e-mails are received before the deadline.

You may also review the proposed draft permit and review report by clicking on the links below

[Draft Permit](#)

[Draft Review Report](#)

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.**