

# Notice of Public Hearing – Dec. 13, 2007

## Public Comment Period begins Nov. 12, ends Dec. 21, 2007



State of Oregon  
Department of  
Environmental  
Quality

# Proposed Air Quality Permit for Owens Corning Foam Plant

The purpose of this notice is to invite you to make oral comments on this proposed air quality permit issuance at a public hearing. You may also comment in writing.

### DEQ's role:

The Oregon Department of Environmental Quality (DEQ) is responsible for protecting and enhancing Oregon's water and air quality, for cleaning up spills and releases of hazardous materials, and for managing the proper disposal of hazardous and solid wastes. One way DEQ does this is by requiring permits for certain activities. DEQ issues permits to regulate the type and amount of air emissions at a regulated facility.

### Public hearing details:

Information session begins at 6:30 p.m. with formal hearing to follow:

Centennial High School  
Community Room  
3505 S.E. 182<sup>nd</sup> Ave.  
Gresham, Oregon

### Written Comments due:

Written comments are due by 5 p.m., Friday, Dec. 21, 2007.

### Where can I send my comments?

Catherine Blaine, Permits Coordinator  
503-229-5582 or 1-800-452-4011  
DEQ Northwest Region Office  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987  
Fax: 503-229-6945  
E-mail: [blaine.catherine@deq.state.or.us](mailto:blaine.catherine@deq.state.or.us)

### Where can I get technical information?

George Davis, Environmental Engineer  
503-229-5534 or 1-800-452-4011  
DEQ-Northwest Region  
2020 SW Fourth Avenue, Suite 400  
Portland, OR 97201-4987  
Fax: 503-229-6945  
E-mail: [davis.george@deq.state.or.us](mailto:davis.george@deq.state.or.us)

### Where can I get background information?

Information about this permit action is viewable on-line by clicking the following links:

[Application](#)  
[Draft Permit](#)  
[Draft Review Report](#)  
[Draft Detail Sheet](#)

You can review hard copies of the draft permit and related documents at the Gresham Public Library located at 385 NW Miller Avenue, Gresham, and DEQ offices in Portland and Gresham. For an appointment, call Susan Curry at (503) 229-5554 in Portland or Susan Patterson at (503) 667-8414 x55022 in Gresham.

### What is proposed?

DEQ proposes to issue a Standard Air Contaminant Discharge Permit for Owens Corning 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. Since this will be a new permit, all conditions are new to this facility.

### Permit expiration

Oregon law requires facilities with a Standard Air Contaminant Discharge Permit to renew that permit every five years. Upon issuance, this permit will be effective for five years, expiring on January 1, 2013.

### Who is the applicant?

Owens Corning Insulation Systems, LLC

### Where is the facility located?

18456 N.E. Wilkes Road  
Gresham, Oregon 97230

### Who might have an interest?

People who work, live, and recreate in the area.

### Northwest Region Air Quality

2020 S.W. Fourth Ave.  
Suite 400

Portland, OR 97201-4987

Phone: (503) 229-5263

(800) 452-4011

Fax: (503) 229-6945

Contact: George Davis

E-mail:

[davis.george@deq.state.or.us](mailto:davis.george@deq.state.or.us)

[www.oregon.gov/DEQ](http://www.oregon.gov/DEQ)

### **What does Owens Corning do that affects air quality?**

Owens Corning proposes to manufacture rigid polystyrene foam insulation boards, known as XPS (extruded polystyrene) foam. The foam boards are made by mixing molten polystyrene plastic with a liquid “blowing agent”, and then extruding the mixture (forcing it through an opening of a specific size). During extrusion, the blowing agent changes from liquid to gas, which forms the cells (bubbles) in the foam.

After the foam hardens, it is cut into boards. Foam boards that do not meet quality standards and other foam scraps are ground up and recycled. Cutting and grinding of the foam creates foam dust and releases some of the blowing agent as the cells are crushed. Most of the foam dust is captured and recycled into the process. The dust that is not captured and recycled is largely controlled by a baghouse filter, but a small amount is emitted. The blowing agent is emitted.

Owens-Corning also proposes to recycle polystyrene foam made by other manufacturers. Some of this foam is made using blowing agents that are classified as VOCs, so the foam recycling process may release VOCs into the air.

Owens Corning will release Particulate Matter (PM), Carbon Monoxide (CO), Nitrogen Oxide (NOx), Sulfur Dioxide (SO<sub>2</sub>), and Volatile Organic Compounds (VOCs) to the air.

### **What legal requirements apply?**

Oregon Administrative Rule 340-216-0020, Table 1, requires facilities that have emissions of 10 or more tons per year of any single criteria air pollutant before control to obtain a permit.

Oregon Revised Statutes (ORS) 468A.040 and Oregon Administrative Rules (OAR) Chapter 340 Division 216 and 218 give DEQ the authority to issue permits. OAR Chapter 340 Divisions 200 through 268 contains all pertinent rules that govern the air quality program.

### **How does DEQ determine what requirements go in the permit?**

Various federal and state regulations apply to a facility depending on the type of industry, the type and amount of pollutants emitted, and the location of the facility. All applicable regulations must be contained in the permit, including the appropriate recordkeeping, monitoring, and reporting requirements to ensure compliance with these rules.

### **Meeting air quality standards**

Air quality in the Greater Portland Metropolitan Area meets the National Ambient Air Quality Standards (NAAQS) established by the US Environmental Protection Agency (EPA) to protect public health. A review of Owens-Corning’s application by DEQ indicates the air emissions from the XPS foam plant will not result in a violation of those standards. DEQ is responsible for establishing permit emissions limits that do not violate air quality standards.

### **What pollutants are considered in determining permitted limits?**

EPA and DEQ use six key pollutants as indicators of air quality. These are known as “criteria pollutants” and are compounds that, if inhaled, may lead to health effects that generally aggravate cardiovascular and respiratory disease. If the amount of criteria pollutants emitted is greater than a regulated minimum, then emission limits are established.

For more information about criteria pollutants, go to:

[www.deq.state.or.us/aq/forms/2005ar/2005ar.pdf](http://www.deq.state.or.us/aq/forms/2005ar/2005ar.pdf)

Hazardous air pollutants (HAPs) are compounds that, if inhaled, may pose a threat of adverse human health or environmental effects, including, for example, acute or chronic toxicity, cancer, birth defects, or reproductive dysfunction. The mere presence of these pollutants in the air does not necessarily mean that a health risk exists. EPA has established a list of 187 compounds that are classified and regulated as HAPs. If the amount of HAPs released is greater than a regulated minimum level, then additional requirements may also apply.

For more information about hazardous air pollutants, go to:

[www.epa.gov/ttn/atw/hlthef/hapindex.html](http://www.epa.gov/ttn/atw/hlthef/hapindex.html)

The blowing agent that Owens Corning proposes to use is a blend of HFCs (hydrofluorocarbons, compounds made up of carbon, hydrogen and fluorine). The HFCs that Owens Corning proposes to use are HFC-134a, HFC-143a, HFC-152a, HFC-245fa and HFC-365mfc. They are not volatile organic compounds (VOCs) or hazardous air pollutants (HAPs). They are not ozone-depleting substances. They are greenhouse gases (GHGs), but neither Oregon DEQ nor the US Environmental Protection Agency currently regulates for these compounds.

One of the HFCs, HFC-152a, appears on a list of flammable substances regulated under the accidental spill prevention program (OAR 340-244-0230 Table 3 Part B). Because of this, they are included under the definition of “regulated air pollutant” in OAR 340-200-0020(96)(a)(E) and subsequently trigger the requirement to establish a Plant Site Emission Limit in OAR 340-222-0020. These rules will require monitoring and reporting of HFC-152a through conditions contained in this permit. No other emission limits apply.

### **Emissions and permit limits**

Table 1 below presents the maximum allowable emissions for the facility. 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.

### **Compliance history:**

DEQ has issued notices of noncompliance with air quality permits to two Owens Corning facilities in NW Portland and one for constructing a new facility without a permit.

Owens Corning Trumbull has a Standard ACDP (#26-1815) and was last inspected in 2005. DEQ issued Notices of Noncompliance to this facility in 1999, 2000, and 2005 for failing to comply with various monitoring and reporting requirements. DEQ did not assess any civil penalties. This facility is currently in compliance.

Owens Corning Linnton has a Title V permit (#26-3067) and was last inspected in 2007. DEQ issued Notices of Noncompliance to this facility in 1998 for failing to report emissions and 2000 for failing to submit a timely renewal application. In 2000, DEQ assessed a civil penalty for that violation and the company paid the fine. This facility is currently in compliance.

DEQ issued a Notice of Noncompliance in 2005 for constructing a new facility in Gresham without a permit (permit application #26-0138). DEQ did not assess a civil penalty. Owens Corning withdrew this permit application in 2006.

### **What other DEQ permits are required?**

Since Owens Corning is subject to OAR 340-244-0230, a risk management plan will need to be submitted and approved by the State Fire Marshall, the implementing agency for these rules.

### **What other sources of air pollutants are in the vicinity of the facility?**

Various sources emit similar air pollutants. EPA and DEQ split up the sources into 3 categories: point, area, and mobile sources. Point sources are primarily large industrial facilities. Area sources are smaller than point sources and include backyard burning, woodstoves, consumer products, gasoline stations, etc. Mobile sources include cars, trucks, airplanes, ships, railroads, and construction equipment.

There are no other known manufacturers of XPS foam in the area.

### **What other information is related to this permit action?**

In 2005, Owens Corning proposed to manufacture a similar product using hydrochlorofluorocarbons (HCFCs) at this same location in Gresham and withdrew their permit application in 2006. The current application does not request the use of this chemical.

An information meeting was held on November 1, 2007 to inform the public of this application and to gather information prior to drafting the permit. At that meeting, an issue was raised that caused DEQ staff to take another look at the definition of “regulated air pollutant”. Based on this, it was discovered that one of the blowing agents, HFC-152a, was indeed a regulated air pollutant. This draft permit addresses this new information.

### **What happens after the hearing?**

After the formal comment period closes on December 21, 2007, DEQ will consider and provide responses to all comments received. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility’s air quality permit.

### **Accessibility information**

DEQ is committed to accommodating people with disabilities at our hearings. Please notify DEQ of any special physical or language accommodations or if you need information in large print, Braille or another format. To make these arrangements, contact DEQ Communications & Outreach (503) 229-5696 or toll free in Oregon at (800) 452-4011; fax to 503-229-6762; or e-mail to [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).



People with hearing impairments may call  
DEQ's TTY number, 503-229-5471.

**Table 1**

<b>Criteria Pollutant</b>	<b>Proposed Limit (<u>tons/yr</u>)</b>
Particulate Matter (PM)	24
Small Particulate Matter (PM <sub>10</sub> )	14
Nitrogen Oxides (NO <sub>x</sub> )	39
Carbon Monoxide (CO)	99
Volatile Organic Compounds (VOC)	39
HFC-152a	224

