



Invitation for Public Comment

Proposed Renewal of a Title V Air Permit for: Miles Fiberglass and Composites Public Comments Accepted: February 20, 2007 to March 28, 2007, 5pm.

Permit # 03-2778

What is being proposed?

DEQ is planning to renew an air permit for Miles Fiberglass and Composites 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 Miles Fiberglass and Composites 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 (NESHAP) for reinforced plastic composite production facilities, 40 CFR Part 63 Subpart WWWW, which was promulgated in 2003. This facility is subject to the NESHAP because it is an existing major source of Hazardous Air Pollutants (HAP) which conducts open molding operations that emit less than 100 tons per year of HAP emissions. The only change to the emission limits in the renewal permit is adjusting the emission limit for Particulate Matter and Small Particulate Matter to zero based on current regulation.

Where is the facility located?

The facility is located at 8855 SE Otty Road, Building B; Portland, Oregon 97266.

Miles Fiberglass and Composites owns a separate facility, Building A, which is located at 1516 Main Street, Building A; Oregon City, Oregon 97045. DEQ renewed the air permit for Building A, permit number 03-2777, in November, 2006 after a separate public notice.

What does Miles Fiberglass and Composites do that affects air quality?

Miles Fiberglass and Composites produce fiberglass-reinforced parts for the light/heavy rail, recreational vehicle, and custom product industries. They use the following processes for their gel coating, laminating, mold production and maintenance activities: covered cure, mechanical spray, light resin transfer molding, hand lay-up, press molding, vacuum molding, vacuum bagging, and gel-coat operations. The resins used to manufacture the various finished fiber reinforced products contain monomers, which are usually styrene. During resin application,

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Permit Coordinator:

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

Clackamas Corner Branch
Library
11750 SE 82nd Ave., Ste D.
Portland, Oregon
(503) 722-6222

And online:

[Draft Permit](#)

[Draft Review report](#)

Comments due by:

March 28, 2007 5pm

We accept comments in writing, by e-mail, fax, or in person, during a scheduled hearing of one is held.

Please take into account any delays between servers so that e-mails are received before the deadline. You may contact us directly.

Mail to: 2020 SW 4th Ave., Suite 400

Portland, OR 97201-4987

Fax: (503) 229-6945

E-Mail to:

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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.

some of the monomer evaporates out of the resin before it can be chemically linked, which results in emissions of VOCs, primarily styrene. The VOC 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 established by the US Protection Agency (EPA) health. DEQ has air emissions from the Composites will not of those standards. DEQ ensuring that the established by the not exceeded.

Criteria Pollutants	Current Emission Limit (t/yr)	Proposed Emission Limit (t/yr)
Particulate Matter (PM)	1.0	0.0
Small Particulate Matter (PM ₁₀)	1.0	0.0
Nitrogen Oxides (NO _x)	0.0	0.0
Sulfur Dioxide (SO ₂)	0.0	0.0
Carbon Monoxide (CO)	0.0	0.0
Volatile Organic Compounds (VOC)	39.0	39.0

For more information on criteria pollutants, check the link on DEQ's web site, <http://www.deq.state.or.us/air/aq/data/annrpt.htm>

meets the standards Environmental to protect public determined that the Miles Fiberglass and result in a violation is responsible for emission limits facility's permit are

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.

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.

What is Miles Fiberglass and Composites' compliance history?

DEQ inspected this facility on a regular schedule, with the most recent inspection occurring on April 5, 2005, and have consistently found them in compliance with all permit conditions. There is one odor complaint on record for the facility; there are no enforcement actions on record for Miles Fiberglass and Composites. Records indicate they have not had any violations with their permit.

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: styrene, 37.3 tons per year (tpy); dimethyl phthalate, 0.05 tpy; methyl isobutyl ketone, 0.15 tpy; toluene, 0.15 tpy; xylenes, 0.15 tpy.



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(ii) This facility is located in a maintenance area for ozone, and is a significant source of VOCs and an insignificant source of NO_x, which are both precursors of ozone. The source is also located in a maintenance area for carbon monoxide, but is an insignificant 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 Clackamas Corner Branch, 11750 SE 82nd Avenue, Suite, D, Portland, Oregon, (NE corner of Clackamas Town Center) or online at <http://www.oregon.gov/deq/>. 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 March 28, 2007** We accept comments in writing, by e-mail, or in person during the scheduled public hearing.

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.