Clean Air Act Compliance Inspection Report

United States Environmental Protection Agency
Region 10 – Seattle, WA

Partial Compliance Evaluation

PCC Structurals, Inc. – Large Parts Campus

Portland, Oregon

Inspection Dates: November 15-16, 2023

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Table of Contents

Attachments

1. Basic Facility and Inspection Information

Facility:	PCC Structurals, Inc. – Large Parts Campus 4600 SE Harney Drive Portland, OR 97206
AFS Number:	OR0000004105101867
FRS Number:	110000487241
Permit Number:	Standard ACDP #26-1867-ST-01 Oregon Department of Environmental Quality
Facility Contact:	Bryan McCampbell – Division Environmental Manager 503-593-4434, Bryan.McCampbell@pccstructurals.com
Agency Inspectors:	Zach Hedgpeth, PE – EPA Region 10 206-553-1217, hedgpeth.zach@epa.gov Boris Barrera – Oregon DEQ 503-860-4087, boris.barrera@deq.oregon.gov Heather Kuoppamaki, PE – Oregon DEQ 503-407-7596, heather.kuoppamaki@deq.oregon.gov
Inspection:	November 15-16, 2023
Inspection Report:	January 24, 2024
Inspection Notice:	Unannounced

Disclaimer

This report is a summary of observations and information gathered from the facility at the time of the inspection. The information provided does not constitute a final decision regarding compliance with the Clean Air Act (CAA) and applicable regulations or permits, nor is it meant to be a comprehensive report of all activities and processes conducted at the facility.

2. Introduction

a) This was a Clean Air Act (CAA) compliance inspection by the Environmental Protection Agency (EPA). Boris Barrera and Heather Kuoppamaki of the Oregon Department of Environmental Quality (ODEQ) attended this inspection.
b) The purpose of this inspection was to conduct a partial compliance evaluation (PCE) of the facility with respect to applicable requirements under the CAA, including the current air permit issued by ODEQ.
c) Components of the inspection included a walk-through to gain basic familiarity with the facility equipment and processes, examination of industrial process equipment and air pollution control equipment, review of various documents, and discussions with facility staff, in addition to the observations of the inspectors.
d) Advance notice of this inspection was not provided to the facility.

3. Inspection Elements and Field Observations – November 15, 2023

a) Arrival and Introductions. I arrived at the facility around 09:00 at the gated entrance on SE Harney Drive in the northwest portion of the facility. Upon arrival, gaining entrance to the facility was difficult. The gated entrance was equipped with a push button paging system, but after pushing the button several times, there was no answer. I also called the phone number listed for the facility on Google Maps (503-777-7495) but the number was inactive. With Inspector Barrera from ODEQ accompanying me in his own vehicle, we eventually made our way to the entrance on SE Johnson Creek Boulevard, where we spoke with the security guard on duty. After explaining the nature of our visit (unannounced CAA inspection), the guard contacted facility staff. We proceeded east along the facility driveway to a small parking area near the southeast corner of the site. Upon entry, we were met by Bryan McCampbell, the Division Environmental Manager for PCC Structurals, Inc. (PCC). I introduced myself, explained the purpose of my visit as an unannounced EPA inspection under the CAA, and presented my inspector credentials to Mr. McCampbell. While in the facility lobby, I spoke by phone with Inspector Kuoppamaki of ODEQ and provided her with directions for entrance to the facility. She joined us in the lobby shortly thereafter. Also in the lobby, Mr. Barrera signed in using a computerized kiosk. After reviewing the kiosk screen, I informed Mr. McCampbell that as a federal inspector, I could not sign or agree to anything containing waiver of liability or non-disclosure agreements. Mr. McCampbell indicated it was not necessary for me to sign in using the kiosk. The group then proceeded into the facility for the opening conference.
b) Opening Conference. The agency inspectors met with the following PCC personnel in a conference room: Bryan McCampbell, Division Environmental Manager, Monica Franz, Environmental Engineer, and Brandon Hadzinsky, Environmental Affairs.
    1. Process Discussions. Mr. McCampbell and Ms. Franz provided a brief overview of the facility and the industrial processes which are conducted at the Large Parts Campus (LPC). In general, the facility conducts investment casting processes to produce structural components for various industries, primarily aerospace. The LPC is generally broken into two facilities, referred to by facility personnel as the Titanium Plant and the Steel Plant. In general, each facility produces structural

components composed of specialized alloys of either titanium or steel. “Steel” casting processes include two types of investment casting: air casting or vacuum casting. Air casting refers to casting that is conducted at atmospheric pressure, while vacuum pumps are used to create a vacuum inside the vacuum casting vessels. “Titanium” casting is entirely vacuum casting.

2. Inspection Scope, Photos, and CBI. During the discussion, I reviewed the purpose and scope of the CAA inspection. I explained that the CAA inspection will be a PCE. This means the inspection will focus on certain areas and will not review each applicable requirement. Photographs and confidential business information (CBI) were discussed. The facility considers much of the process equipment to be CBI, and agreed to inform me if specific areas, info, or equipment of interest for air quality purposes during inspection is considered CBI. Mr. McCampbell stated that PCC doesn’t need to take side-by-side photos with EPA as long as I check regarding desired photos beforehand. Additionally, I agreed to a visual review of the photos by PCC personnel at the end of the inspection to identify any that the facility would claim as CBI.
3. NESHAP Discussion. It was noted that the facility is subject to multiple rules under 40 CFR Part 63, the National Emissions Standards for Hazardous Air Pollutants (NESHAP), however, none of the applicable provisions are included in the air permit (see Attachment 3). Mr. McCampbell stated that the facility has made their own applicability determinations and have coordinated with ODEQ on these matters in the past.
4. Complaints and Monitoring. Mr. McCampbell and Ms. Franz stated that the facility does not receive complaints directly, and only knows about complaints that are passed to them through David Graiver at Oregon DEQ. I noted that having an inactive phone number in the facility Google Maps search makes it difficult for potential complainants to reach the facility. The current complaint procedure is as follows: 1) ODEQ contacts PPC environmental staff with information on the complaint, 2) PCC environmental staff investigate the complaint by checking with appropriate facility personnel and their third party oxidizer temperature monitoring company, and 3) PCC environmental staff send the results of their investigation back to Mr. Graiver at ODEQ. Documentation of each complaint is kept in the facility electronic files. During this discussion Mr. McCampbell and Ms. Franz clarified that PCC contracts with a third party company that assists with monitoring the temperature on both of the oxidizers operated by the facility. Both oxidizers are equipped with continuous temperature monitoring, and any alarms go the facility maintenance staff and the third party company, not to PCC environmental staff.
5. Excess Emissions and Baghouse Monitoring. In addition to the continuous temperature monitoring on the oxidizers, the three PCC staff explained that another PCC employee (Rick King) conducts weekly baghouse inspections and monthly visible emissions checks. Mr. King sends weekly emails to the PCC environmental staff with results, including differential pressure readings and information regarding any issues or repairs.
6. The opening conference ended at approximately 11:30, and the inspectors departed the facility for lunch.

c) Field Observations. Following a break for lunch, I returned to the facility around 13:00 accompanied by the two ODEQ inspectors. We returned via the northwest parking lot at the Steel Plant, and met with the same three PCC environmental staff.

1. We proceeded with a general walk-through of the Titanium Plant to observe the facility processes and various control equipment. The walk-through was generally led by Mr. McCampbell with assistance from Mr. Hadzinsky and Ms. Franz. The following describes my observations in each area.
2. *Wax Making & Wax Assembly.* In this area of the plant, wax molds are created and assembled for each part to be cast. This portion of the facility is temperature and humidity controlled via the heating, ventilation, and air conditioning (HVAC) system, and is vented directly to atmosphere. While in this area, I noticed a faint wax odor. Small, heated torches and other tools are used in this area to weld pieces of wax together.
3. *Permanent Total Enclosure (PTE).* The PTE area of the Titanium Plant is a large section of the facility where wax molds of parts are dipped in a slurry and then coated with fine sand. The slurry uses an alcohol, and a strong alcohol odor was evident to me upon entering the PTE. The slurry dipping and sand coating process is repeated several times to achieve product specifications. While in the PTE, I observed two slurry dip tanks which were not operating at the time of the inspection. There was very little activity in the area at the time of the inspection, and Mr. McCampbell stated that production is highly variable. After being in the PTE for a few minutes, the group did observe one part being dipped in one of the slurry tanks by a robotic arm. Mr. McCampbell explained that the PTE is exhausted through two baghouses, which are each equipped with secondary high efficiency particulate air (HEPA) filters. Following the HEPA filters, the two exhaust ducts are combined before being routed to the catalytic oxidizer. The group exited the PTE to the outdoors east of the Titanium Plant building and observed one of the two baghouses (Baghouse 3342, see photo 247) and the catalytic oxidizer (see photo 248). The second PTE baghouse was observed later in the inspection and is described below.
4. *Wax Reclaimer.* While outdoors east of the Titanium Plant building we observed the wax reclaimer (see photo 249). This unit periodically receives molten wax from the autoclave and vents to atmosphere. Mr. McCampbell stated that the autoclave itself is also uncontrolled and vents to atmosphere. Several slugs of molten wax entered the wax reclaimer while we observed the unit. Each time molten wax entered the wax reclaimer, a cloud of white visible emissions were observed being released from the wax reclaimer exhaust stack. I noted minimal wax odor during these release events, each of which lasted less than one minute. Mr. McCampbell noted that the wax contains an aqueous solution.
5. *Catalytic Oxidizer.* The group next observed the catalytic oxidizer which is located nearby the wax reclaimer and Baghouse 3342 and is shown in photo 248. The PCC environmental staff indicated that the catalyst had last been replaced in/around 2018-2019. The four temperature probes on the unit were observed, and are shown in photos 250-251. PCC staff stated that probes 2 and 3 are used for temperature monitoring with respect to the minimum required temperature settings, while probes 1 and 4 are not used for this purpose.

6. *Titanium PTE Baghouses.* We next looked more closely at the first of the two baghouses which control emissions from the Titanium PTE, as described above, Baghouse 3342. The differential pressure gauge on the unit was observed to be reading just over 1" water column (in.w.c.) at the time of the inspection (see photo 252). The baghouse catch was also observed (see photo 253). The baghouse hopper was securely connected to a 55-gallon drum via flexible tubing, and the area was reasonably clean with no significant signs of spillage or fugitive emissions. The group next re-entered the Titanium Plant building and observed the second PTE baghouse, Dust Collector 3007. This unit is located inside a small room that contains historic thorium radioactivity, according to Mr. McCampbell. Warning signs to this effect were noted on the door to the room. I briefly entered the room and photographed Dust Collector 3007 and associated ducting and the control panel for the unit (see photos 254-257). I noted heavy dust buildup in the room.
7. *Burnout and Pre-Heat Furnaces.* Next the group observed Burnout Furnace 9738, shown in photo 258. According to Mr. McCampbell, the Titanium Plant has two burnout furnaces which are used to burn out any organics remaining in the ceramic shells after the majority of the wax is removed in the autoclave. Mr. McCampbell and Ms. Franz stated that Burnout Furnace 9738 exhausts through an "afterburner" before being released to atmosphere. The afterburner was not observed during this inspection. As shown in photo 258, the exhaust from Burnout Furnace 9738 is released into a space that is open to the building air below a small hood which leads to a duct that exits the building wall. The afterburner was not visible inside the building. Mr. McCampbell also stated that the Titanium Plant operates two additional furnaces which are used to pre-heat the ceramic shells before casting.
8. *Casting.* All casting at the Titanium Plant is conducted under vacuum, as discussed during the opening conference. After leaving the burnout furnaces, the group observed Titanium Casting Furnace 3. Vacuum in Furnace 3 is created using "dry pumps." The exhaust lines from all the dry pumps are manifolded together and exhausted through the building wall and released to atmosphere as shown in photos 259-260. While outside the casting area, we observed a titanium "skull", which is residual titanium which had been removed from a crucible.
9. *Cleaning Department.* In this area of the Titanium Plant, tanks containing sodium hydroxide (NaOH) solution, along with the building air, are vented to two wet scrubbers located outside the exterior building wall. Slotted hoods and exhaust ducting adjacent to the NaOH tanks are shown in photo 262. According to Mr. McCampbell, the scrubbers were installed for employee comfort. The scrubbers are not monitored by the environmental staff; the maintenance department conducts weekly preventive maintenance and keeps their own records. None of the three PCC environmental staff were familiar with the scrubber parametric monitoring or the type of scrubber. After observing the scrubber pickups inside the building, the control panel for the scrubbers was observed and is shown in photos 263-265. Both scrubbers (Scrubber 1 and 2) are controlled by a common panel. At the time of the inspection, both scrubbers were in operation. Differential pressure was displayed as 0.6 in. w.c. across Scrubber 1 and 0.3 in. w.c. across

Scrubber 2. Scrubber 2 sump pH was displayed as -16.33. The following additional details were provided regarding the scrubbers: flow rate for each scrubber is 20,000 cubic feet per minute (cfm), and blowdown rate for each scrubber is ~3 gallons per minute (gpm). Photo 266 was taken of the scrubber nameplate; the units are Fisher-Klosterman Emtrol, Model MS900H. The units are shown in photo 267, and appear to be identical tangential entry cyclonic scrubbers. Based on the low differential pressure across the units, they may be open spray chamber scrubbers with limited or no internal media.

10. *Torch Cutting.* The next activity observed was torch cutting. Two torch cutting booths were observed, both vented to Baghouse 3930 according to the PCC environmental staff. Torch cutting was occurring in Booth 2 at the time of the inspection. Visible fume emissions were observed being emitted to building air from the activity occurring immediately in front of the booth, behind curtains. The booth was equipped with a fume capture hood which had been damaged/modified to allow a chain hoist, which was holding the part being worked on in the booth. Even with the damage/modification to the hood, reasonably good capture of the visible emissions was achieved based on my observations. Nearby Ms. Franz showed me Booth 1, which was not being used at the time of the inspection. Booth 1 appeared larger and of newer design compared with Booth 2.
11. *Baghouse Dye Tests.* At this point in the walk-through, the PCC environmental staff provided additional information regarding the dye test procedures conducted on the facility baghouses. Dye tests are generally conducted following each bag change in any of the baghouses. Bag changes generally occur 5-10 times annually. Most dye tests are conducted by an outside contractor "Blast Cleaning Airtek NW", but Mr. King can also conduct them in-house if necessary. PCC environmental staff receive a report following each dye test.
12. *Grinding Booths.* Three different groups of grinding booths were observed next, each with nine booths. The first group of nine booths are an older style booth with emissions captured and ducted to a baghouse, see photo 268 (this particular baghouse was not identified during the inspection). The second group of nine booths were a newer design, equipped with water curtains and filters, and were exhausted back into the building air. The third group of nine booths were similar to the first group, older design booths vented to a baghouse. Mr. McCampbell wasn't sure if the third group of nine grinding booths are vented to the same baghouse as the first group, or a different baghouse.
13. *Cold Acid Bath.* The facility operates a cold acid bath process which is vented to atmosphere with no controls. The process flow is detergent bath → wash → cold acid bath → rinse. The tanks are enclosed with curtains, and emissions from the tanks are collected using slotted hoods.
14. The field walk-through completed around 16:30. The inspectors and PCC environmental staff returned to the facility conference room where we met briefly with Mr. McCampbell's supervisor, Tyson Terhaar, the Director for EHS and Facilities with PCC Structurals. After a short debrief of the day's activities, the inspectors departed the facility around 17:00.

4. Inspection Elements and Field Observations – November 16, 2023

a) Arrival and Plan for the Day. I arrived at the facility around 09:00 at the gated entrance on SE Harney Drive in the northwest portion of the site and met Mr. Hadzinsky. Inspectors Barrera and Kuopamaki of ODEQ also arrived, and we proceeded to the conference room where Mr. McCampbell and Ms. Franz joined us. I outlined the plan for the remainder of the inspection as follows:
    1. Review files related to complaints and weekly inspections.
    2. Observe ducting, exhaust points, etc on the facility roof.
    3. Continue field walk-through examining process and air pollution control equipment as time allows.

b) File Review. The group remained in the conference room and reviewed/discussed various records, as described below. In general, the facility staff displayed electronic files and documents on a screen for review.
    1. *Complaint files* maintained by the PCC environmental staff were reviewed. The facility keeps a folder containing documents related to each complaint (generally relating to odors) sent to them by ODEQ. As stated previously, the facility receives no complaints directly from the public. As shown in the electronic files, there were four complaints received during 2023, on the following dates: September 5 and 14, and October 3 and 19. Facility staff stated that there is one serial complainant whose complaints ODEQ no longer forwards to the company for response. Documentation for each of the four 2023 complaints generally followed the steps described during the opening conference. In reviewing complaints files from the past, I asked to look at the June 12, 2017, complaint and found that the documentation and process were both similar. I requested copies of the documents related to the October 19, 2023, complaint, and these were provided by Mr. McCampbell post inspection.
    2. *Baghouse weekly inspection records* were reviewed next. Rick King reads differential pressure and visible emissions on each baghouse weekly and sends an electronic report to the environmental staff. Several weekly reports were reviewed on-screen, and the group traced the documentation of identification and follow-up regarding an elevated differential pressure reading on Baghouse 6532 noted in the August 18, 2023, weekly report. Records contained in the environmental department files showed identification of the issue by Mr. King, including his preliminary diagnosis of the cause of the issue. The group also reviewed, on-screen, a follow up dye test report from September 9, 2023, by Air Tek NW that indicated a different cause of the issue, and a second dye test report that stated there were no leaks noted. Review of invoices and additional documentation indicated that documentation retained by the environmental department doesn't actually show what the issue was or the necessary corrective action, just that the follow-up dye test did not show any leaks. PCC environmental staff stated that detailed documentation of the repairs may exist in the maintenance tracking system, known as "E-maint." I requested copies of the documents related to the August 18, 2023, differential pressure issue, and these were provided by Mr. McCampbell post inspection. Additionally, it was noted that Mr. King does not check the temperature on the two oxidizers, nor does he—or anyone in the

environmental department—monitor anything on the Cleaning Department scrubbers or the Chem Mill's acid "mist eliminator." The PCC environmental staff stated that the maintenance department might conduct some monitoring on the wet control devices, but they were not sure of this.

c) Roof Observations. Around 10:30, the group left the conference room and climbed to the Titanium Building roof.
    1. I took photos 269-272 from the top of a set of yellow stairs, showing the view generally west. The approximate location of these photos is shown on page 7 of Attachment 2. While on the roof, I noted that some emission points were labeled using blue placards (see photo 273), some were labeled using spray paint, while others were not labeled.
    2. The exhaust ducts from the two baghouses venting the Titanium Building PTE were observed, joining together before being routed to the Catalytic Oxidizer.
    3. From the western edge of the Titanium Building roof, I took several photos showing the view from west around to facing east (photos 278-283). The approximate location of these photos is shown on page 7 of Attachment 2.
    4. While standing near the western edge of the Titanium Building roof, several members of the group, including myself, noted an intermittent "metallic" odor which appeared to originate from the Steel Plant foundry building (visible on the left side of photo 280). The Steel Plant foundry building contains multiple burnout and conditioning (pre-heating) furnaces which are not equipped with any control equipment and vent directly to atmosphere. I observed that the taller rectangular blue stack was venting hot exhaust gasses at the time, and Mr. McCampbell stated that he believes that is the exhaust from the burnout oven that is equipped with an afterburner.
    5. From this vantage point, I also observed five horizontal building exhaust ducts on the roof of the Steel Plant foundry building. Four of these ducts released directly to atmosphere, while one had been connected to newer-looking duct that routed emissions to the large Donaldson-Torit baghouse (Baghouse 9256) outside the south wall of the foundry building.
    6. Before departing the Titanium Building roof, the group briefly noted the Acid "Mist Eliminator" exhaust stack (photo 284) and the Ammonia Gel Booth stack (photo 285).
    7. The inspectors departed the facility around 12:00 for lunch.

d) Office Discussions. The inspectors returned to the facility around 13:20 and the following discussions occurred in the conference room.
    1. A brief discussion of emission inventory calculations occurred. Mr. McCampbell stated that the facility calculates emissions from each baghouse by weighing the catch and calculating emissions based on the manufacturers stated control efficiency for each filter.
    2. The "condensation filtration devices" on the Steel Plant were briefly discussed. These devices control emissions from the exhaust from oil vacuum pumps that create the vacuum for casting operations at the Steel Plant. These devices are discussed in more detail later in this report.

e) Field Observations. Around 13:45 the group proceeded with a general walk-through of the Steel Plant to observe the facility processes and various control equipment. The walk-

through was generally led by Mr. McCampbell with assistance from Mr. Hadzinsky and Ms. Franz. In general, each area of the Steel Plant was similar to the corresponding area in the Titanium Plant which I had observed the previous day. The following describes any observations noted in each area.

1. *Wax Making & Wax Assembly.* No observations noted.
2. *Permanent Total Enclosure (PTE).* I observed the investing area, slurry dip tanks, and sandfalls. The Steel Plant PTE is vented to a single baghouse, followed by a regenerative thermal oxidizer (RTO).
3. *Autoclaves.* The facility was in the process of installing a new, much larger, autoclave at the time of the inspection. The new autoclave will vent directly to atmosphere, similar to the current autoclave. While observing the autoclaves, suspended particulate matter was observed in the building air above the autoclaves.
4. *Steel Foundry.* While in the Steel Foundry, the following observations were noted:
    i. Neither vacuum nor air casting operations were occurring at the time of the inspection.
    ii. I observed two air casting furnaces without emission capture hoods. Any emissions from either air casting furnace would be released to the building air. PCC environmental staff stated that the facility relies on collection of the building air through the overhead vents. As noted earlier, four of the five main ducts venting building air from the Steel Foundry are released directly to atmosphere, while one has been routed to Baghouse 9256.
    iii. While in this area, Mr. McCampbell and Ms. Franz were called away to attend to another matter. Mr. Hadzinsky remained with the inspectors during this time.
    iv. In explaining the venting configuration in the Steel Foundry, Mr. Hadzinsky showed me the control panel for the "Master Caster" (see photo 286). Mr. Hadzinsky stated that the collection system shown in the photo that routes emissions to Baghouse 9256 can be set to collect either emissions from the building air (air casting) or emissions from the Master Caster (vacuum casting). The control panel diagram shows dampers on each of the three ducts leading to the "dust collector", Baghouse 9256. Mr. Hadzinsky stated that the doors of the foundry are closed when air casting is occurring. Based on his observations, Mr. Hadzinsky stated that visible emissions occur when the facility adds a proprietary aluminum source product to the parts. Note that the pickup for the ventilation system shown near the Master Caster is not collecting emissions from the furnace; it is collecting emissions from a hood placed over the space where the cast parts are moved to after pouring for the proprietary aluminum product to be applied.
    v. Mr. McCampbell and Ms. Franz rejoined the group before we left the area near the Master Caster.
    vi. I observed nine burnout furnaces that Mr. McCampbell explained can be used either to burn out residual organic matter from the ceramic shells, or to pre-heat the shells prior to casting. One of the burnout furnaces is

equipped with a natural gas fired afterburner, and vents to the taller, rectangular blue stack we had observed earlier from the Titanium Plant roof. The single furnace equipped with an afterburner processes all parts that contain any non-wax products, such as solidified resin. The remaining eight burnout furnaces don't have afterburners and vent directly to atmosphere. These eight furnaces only process ceramic shells containing wax.

5. *Regenerative Thermal Oxidizer (RTO).* After leaving the Steel Plant foundry building, the group observed the RTO that controls emissions from the Steel Plant PTE. The PTE is kept under negative pressure with fans that exhaust first to Baghouse 3804 and then to the RTO. While in the RTO control room, the following data were recorded from the RTO control panel (see photo 288):

Gas Flow Rate (cfh)	Central Chamber Temp (F)
1390	1556
1090	1557
1060	1568
1060	1562

6. *Baghouse 3804.* This baghouse controls emissions from the Steel Plant PTE, and feeds into the RTO, as described above. The magnehelic gauge display was observed (measuring differential pressure across the baghouse), as shown in photo 289. The display panel included three gauges, but only two pressure lead lines were observed entering the panel. The lower right gauge was labeled "BAGHOUSE BAGS 'DELTA P' (CLEANING BLOWER CONTROL)", indicating this gauge may display the diffential pressure across the baghouse. However, the reference to "cleaning blower control" was unclear. Baghouse 3804 and the RTO are shown in photos 290-292.
7. *Steel Plant Roof.* The group climbed to the Steel Plant roof around 15:35 where I observed the "condensation filtration devices" (see photos 294-295). The devices are essentially plastic pipes filled with steel media. The intent of the devices is to condense oil emitted from the vacuum pumps. The devices are slightly sloped to allow condensed oil to flow back into the vacuum pumps.
8. *Acid "Mist Eliminator."* We next observed the unit referred to by facility staff as the Acid Mist Eliminator. This unit controls emissions from the Chem Mill heated acid baths. Based on observation, the unit appears to be a horizontal flow caustic scrubber. The unit is packed with round media and uses 50% sodium hydroxide solution as the scrubbing liquor. According to the PCC environmental staff, the facility maintenance department monitors the pH of the solution and there are certain alarm levels set. We also observed operations in the Chem Mill, where I noted two rinse tanks and two heated acid tanks (under 200F). Air flow is directed across the tank liquid surface, and is collected with an "air knife" before being routed to the Acid Mist Eliminator.
9. The field walk-through completed around 16:20, and the group returned to the facility conference room for the closing conference.

5. Closing Conference

a) I conducted the closing conference with both ODEQ inspectors and the following PCC staff and management in attendance:
    a. Bryan McCampbell, Division Environmental Manager
    b. Monica Franz, Environmental Engineer
    c. Brandon Hadzinsky, Environmental Affairs
    d. Tyson Terhaar, Director for EHS and Facilities
b) Mr. McCampbell requested my agreement to his recording the closing conference, due to a medical issue that prevents him from taking written notes. I agreed to allow the recording.
c) Mr. Terhaar and Mr. McCampbell conducted a visual review of the photographs I had taken throughout the inspection, and identified photos 278 and 279 as containing information the facility would consider confidential business information (CBI). Given that these photographs did not contain information I considered to be critical for purposes of the CAA inspection, I deleted the photos from my camera while still onsite.
d) I reviewed the EPA Region 10 post-inspection process and timeline.
e) The following records requested as part of the inspection were reviewed verbally. EPA and PCC agreed on a submittal deadline of December 4, 2023, for these records:
    1. Process flow diagram Figures 1-3; Steel, Titanium, MAP.
    2. Seven files related to the October 19, 2023, complaint – The SDS for the wax product will be excluded, as it is considered CBI and not critical for CAA purposes.
    3. Records related to the Baghouse 6532 differential pressure issue identified in Rick King's August 18, 2023, weekly report.
    4. Exhaust point diagram.
f) Next, the following issues were identified as potential compliance concerns under the CAA. I clarified that these items did not necessarily constitute violations and may not include any additional compliance concerns that are identified post-inspection.
    1. Applicability and compliance with federal New Source Performance Standards and National Emission Standards for Hazardous Air Pollutants have been determined by facility personnel, but have not been evaluated by ODEQ or EPA and have not been incorporated into the facility air permit.
    2. The facility operates a large number of uncontrolled emission units, including several furnaces, ovens, the cold acid etching tanks, and the autoclave.
    3. The phone number for the facility that results from searching Google is not active, creating a hindrance for any member of the public to contact the facility.
    4. None of the wet control devices (e.g., the Cleaning Department Scrubbers or Acid Mist Eliminator) are monitored by the PCC environmental department.
g) The closing conference ended around 17:00, and I departed the facility.