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Sent via email only

Monica Franz,

I have reviewed the three source test reports submitted by Mostardi Platt on behalf of PCC Structurals, Inc. on September 29, 2023. Based on my review of the source test reports, DEQ requires that the following issues be addressed in revised source test reports. Revised source test reports are due by December 29, 2023.

General Comments

Blank corrections for aluminum (Al), barium (Ba) and phosphorus (P) exceeded the amounts allowed by EPA Method 29. In all three source test reports, in accordance with EPA Method 29, revise the blank corrections as follows and show calculations for all blank corrections:

1. Front half blank corrections for Al and P. If the measured blank value for the front half (M_{fhb}) is in the range 0.0 to "A" µg (where "A" µg equals the value determined by multiplying 1.4 µg/in^2 times the actual area in inches^2 of the sample filter), use M_{fhb} to correct the emission sample value (M_{fh}); if M_{fhb} exceeds "A" µg, use the greater of I or II:
   I. "A" µg.
   II. The lesser of (a) M_{fhb} or (b) 5 percent of M_{fh}.
2. Back half corrections of Al, Ba, and P. If the measured blank value for the back-half (M_{bhb}) is in the range 0.0 to 1 µg, use M_{bhb} to correct the emission sample value (M_{bh}); if M_{bhb} exceeds 1 µg, use the greater of I or II:
   I. 1 µg.
   II. The lesser of (a) M_{bhb} or (b) 5 percent of M_{bh}.

Specific Comments

BH8901

1. The Method 29 Outlet Run 1 sample volume of 316.521 acf used in the calculations on page 48 does not match the sample volume collected as recorded on the field data sheets on pages 77-78. The field data sheets show a difference between the ending and starting volume of 309.867 acf. Revise all Method 29 Outlet Run 1 calculations using the correct sample volume.
2. The Method 0061 Outlet Run 1 sample volume of 401.687 acf used in the calculations on page 53 does not match the sample volume collected as recorded on the field data sheets on pages 72-76. The field data sheets show a difference between the ending and starting volume of 393.669 acf. Revise the Method 0061 Outlet Run 1 calculations using the correct sample volume.

BH9256

1. Revise the barometric pressure to 30.05" Hg in the calculations for Run 1 of the Outlet for both Method 29 and Method 0061 on pages 48 and 53. A barometric pressure of 30.05" Hg was recorded on the field data sheets on pages 59 and 66.

BH9203

1. Provide an explanation as to why some of the Run 2 tests where less than 480 minutes in length and did not sample at all of the traverse points for an equal length of time.
2. Revise the ΔH value used in the calculations on page 76 to 2.125" instead of 0".
3. Revise the stack diameter used in the calculations on page 80 for Outlet East to 34" as recorded on the Method 1 diagram on page 37.
4. The wrong ending meter volume was used in the calculations on page 68. Revise using the ending sample volume of 451.940 that was recorded on the field data sheet on page 144.
5. For the Method 0061 testing at the Inlet Center, the calculated sample volumes for both test runs, pages 70 & 71, do not match those used to calculate the emissions on page 22. The isokinetic sampling cover sheet, page 145, shows a meter calibration factor of 1.0044 for meter CM11 whereas the meter calibration sheet on page 198 shows a meter calibration factor of 0.994 for meter CM11. Revise calculations using the correct meter calibration factor.
6. For the Method 0061 testing on Outlets East and West, DEQ calculated flowrates, sample volumes and sample mass match those calculated on pages 30 and 31 but the concentration and lb/hr values do not. Review calculations and revise as necessary.
7. For Method 29, Run 2 on the West Inlet, the total mass of chromium reported on page 328 does not match the analytical results from pages 258-259 minus blank corrections. Review data entry and calculations and revise as necessary.
8. For Method 29, Run 1 on the East Inlet, the total mass for arsenic, cobalt, and selenium reported on pages 332-333 do not match the analytical results from pages 263 minus blank corrections. Review data entry and calculations and revise as necessary.

DEQ recognizes the unique challenges this testing posed to your facility and operations, and the results will provide valuable information for completing the risk assessment. If you have any questions or concerns, please contact me directly at 503-869-0054 or thomas.rhodes@deq.oregon.gov. Thank you for your continued efforts with this process.

Sincerely,

Thomas Rhodes

Thomas Rhodes
DEQ CAO Source Test Coordinator

Cc: Brian Eagle, Maul Foster & Alongi
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