

Lane Regional Air Pollution Authority  
Minimal Source Air Contaminant Discharge Permit

## REVIEW REPORT

Gheen Irrigation Works, Inc.

Permit No: 203109

### PERMITTING

#### Permitting Action

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on January 1, 1993, and was originally scheduled to expire on December 31, 1997. No changes have been made to the permit since the last renewal.

#### Other Permits

2. No other permits have been issued or are required by LRAPA for this source.

#### Attainment Status

3. The source is located in an attainment area for all pollutants except PM<sub>10</sub> (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM<sub>10</sub>.

### SOURCE DESCRIPTION

#### Overview

4. The permittee operates a galvanizing operation at 1248 Willagillespie in Eugene. The source was issued its first ACDP on January 1, 1983. In 1998, the facility produced approximately 1.3 million irrigation pieces. Pollutants are emitted from:

- 2 zinc dip tanks,
- 1 baghouse which controls emissions from an epoxy process,
- 1 diesel-fired boiler, and
- 1 gas-fired oven.

Emissions from the source are estimated to be less than 5 tons per year for particulate matter (PM) and less than 10 tons per year for all gaseous pollutants. The operating schedule for source is 2,210 hours per year (8.5 hours per day, 5 days per week and 52 weeks per year).

5. No changes have been made to the facility since the last permit renewal.

#### Process and Control Devices

6. Existing air contaminant sources at the facility consist of the following:
  - a. Diesel-fired boiler without emission controls, installed in 1952,
  - b. Natural gas-fired oven without emission controls, installed in 1972,

- c. 1 baghouse which exhausts directly to the atmosphere, handling Epoxy dust emissions,
- d. 2 zinc hot dip tanks, and
- e. 1 Chemlok coating process.

## EMISSIONS

7. The pollutants of concern associated with this source type are zinc, epoxy dust, and emissions from natural and diesel gas combustion. Emissions of the above pollutants are expected to be minimal. Thorough research was conducted to estimate the emissions for the source but no emission factors were available. Other estimation methods, including material balance, were considered but the information necessary to do this type of analysis was unattainable. The Attachment to this Review Report contains emissions estimates for the facility's natural gas and diesel combustion calculations.

### Baseline Emission Rate

8. The Baseline Emission Rate (BER) has been set at 0 TPY for PM, PM<sub>10</sub>, VOC, NO<sub>x</sub>, SO<sub>x</sub>, CO, and Pb. The source did exist in 1978 but no emissions estimates are available from that time. Because the source was designated as minimal during the baseline year and since it is a minimal source now, the BER has been set at zero (0) for all criteria pollutants.

## MINIMAL PERMIT DETERMINATION

9. The Authority has determined that the source qualifies as a minimal source for the following reasons:
- a. Emissions from this source are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the criteria gaseous pollutants.
  - b. The facility was inspected on July 9, 1999, and found to be in compliance with permit conditions.

## SPECIAL CONDITIONS

10. There are no special conditions specified in the permit.

## NESHAPS/MACT APPLICABILITY

11. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

## NSPS APPLICABILITY

12. There are no sources at this facility for which NSPS standards have been promulgated.

## PUBLIC NOTICE

### Renewal

13. The draft permit was on public notice from October 14, 1999, to November 15, 1999. No comments were received during the 30-day comment period.

MH/bp  
11/23/99

Gheen Irrigation Works, Inc.  
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Expiration Date: December 31, 2002

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Emissions Calculations