

Lane Regional Air Pollution Authority
Synthetic Minor Air Contaminant Discharge Permit Application

REVIEW REPORT

Guild Craft Products, Inc.

Permit No. 203138

1. The Lane Regional Air Pollution Authority (LRAPA) has reviewed the Air Contaminant Discharge Permit (ACDP) application submitted by Guild Craft as received on July 8, 1996. The contents of the application and subsequent correspondence with the source are the basis for the calculations contained within this report.

Source Background and Description

2. Guild Craft operates wood store fixtures and partitions manufacturing facilities (SIC Code 2541) at 1090 Bailey Hill Road and 1010 Wilson Street in Eugene. The facilities are considered contiguous. The 1090 Bailey Hill facility surface coating operation is dependent upon the wood products manufactured at the 1010 Wilson Street facility.

A. 1010 Wilson Street

Woodworking Operations:

- 1) All 3 units ducted to an interior baghouse:
 - 1 Machine Center,
 - 1 Panel Saw,
 - 1 Table Saw.
- 2) All 3 units ducted to an interior baghouse:
 - 1 AEM finish sander,
 - 2 table saws (with 1 sliding table saw).
- 3) All four units ducted to an interior baghouse:
 - 1 table saw,
 - 1 overhead router,
 - 1 radial arm saw,
 - 1 router table saw.

Surface Coating Operations:

- 1 spray booth with dry filters to control overspray.

B. 1090 Bailey Hill Road

Surface Coating Operations:

- 1 spray booth with dry filters to control overspray.

3. This source is located in a nonattainment area for PM₁₀ and located in an attainment area for the remainder of the criteria pollutants.
4. This source is located within 100 kilometers of four (4) Class I air quality protection areas.
5. A Land Use Compatibility Statement (LUCS) from the City of Eugene, dated November 24, 1997, grants unconditional approval.

6. This source is not subject to New Source Review for PM₁₀.
7. This source is not subject to Prevention of Significant Deterioration (PSD) for the affected criteria pollutants. The limit of 29.0 tons Volatile Organic Compounds (VOCs) per year is below the 40 tons per year significance level.

Synthetic Minor Limitations

8. The Synthetic Minor permit limits the source's potential to emit to 9.5 tons per rolling 12-month period of any single Hazardous Air Pollutant (HAP) and 24.5 tons per rolling 12-month period of any combination of HAPs. These limits are below the Title V thresholds of 10 tons per year for a single HAP or 25 tons per year for any combination of HAPs. At such time that the HAP emissions exceed these thresholds, the source will become subject to the provisions of 40 CFR Part 70, Title V Operating Permits, and 40 CFR Part 63, Subpart JJ, National Emission Standards for Wood Furniture Manufacturing Operations. (See the Appendix for determination basis calculations and usage summations).
 - a. The emission factor used for the HAPs assumes that 100% of the HAP component is volatile (as calculated by % by weight HAP which is the basis for the emission rate as measured in pounds of HAP per gallon of coating). By assuming 100% of HAPs are volatile and that 100% of HAPs used are emitted, the limits set effectively restricts the HAP potential to emit to less than major source thresholds.
 - b. These limits, which prevent the facility from needing a Title V permit, require only that the source comply with the area source recordkeeping requirements under the provisions of 40 CFR Part 63 Subpart JJ for Wood Furniture Manufacturing.

Substitutions of coatings may be employed provided that both consumption and composition records are maintained in accordance with the permit reporting requirements.

- c. To confirm the composition for each coating, diluent, and cleanup solvent, information shall be taken from the Material Safety Data Sheets (MSDS) for each material.
- d. Special conditions in the permit require the source to apply for a Title V permit, exclusive of excess emission incidents, prior to an emissions increase above the Title V permit trigger levels for criteria or hazardous air pollutants.

PSEL Information

9. The MSDS information submitted by Guild Craft was used to estimate the VOC emissions from various surface coating operations. In accordance with LRAPA rules, the Plant Site Emission Limit (PSEL) for VOC was established based on projected operating conditions.

Particulate emissions from woodworking operations are contained within the respective facilities and there are no stacks or vents exhausting to ambient. Woodworking equipment venting is ducted to baghouses within the facility interior(s) exhausted to within the facility interior(s).

- a. The PSEL for the source restricts potential emissions from the facility to 3.5 tons per month and 29 tons per year of VOCs and 0.25 tons per month and 1.0 tons per year of both PM and PM₁₀. Per PSEL rule [LRAPA 34-34-060 (5) (G)], the new source PSEL is based upon application of applicable control equipment requirements and projected operating conditions. The annual limit of 29 tons per year of VOCs is based on the worst-case emissions of HAPs.
- b. The emission factor used for the VOCs assumes that 100% of the VOCs used are emitted.
- c. Compliance with the VOC limits effectively limits the source's potential to emit whereby the New Source Review (NSR) and PSD requirements of LRAPA 34-160 do not apply.
- d. To confirm the VOC content for each coating, diluent, and cleanup solvent, information shall be taken from the MSDS for each material.

History of Changes to PSEL

10. No previous PSELs were established for this facility.

Baseline Emission Rate

11. The Baseline Emission Rate (BER) has been set at 0 tons per year. According to the DEQ/AQ Permitting and Inspection Manual:

"The Baseline Emissions Rate for sources constructed after 1978 is zero because they were not contributing to ambient concentrations during baseline year."

Baseline Year 1978 in tons per year:

VOC	=	0
PM	=	0
PM ₁₀	=	0

DJ/bp
11/19/99