

Lane Regional Air Pollution Authority
Synthetic Minor Air Contaminant Discharge Permit

REVIEW REPORT

Newood Display Fixture Mfg. Company

Permit No. 205808

1. The Lane Regional Air Pollution Authority (LRAPA) has reviewed the Synthetic Minor Air Contaminant Discharge Permit (SM-ACDP) application submitted by Newood Display Fixture Mfg. Company. The contents of the application and subsequent correspondence with the facility were the basis for the calculations contained within the review report.

Facility Background and Description

2. Newood operates a wood office and store fixtures, shelving, and lockers manufacturing facility (SIC Code 2541) at 10 North Seneca Road in Eugene. The facility consists of the following operations and control devices:

A. Surface Coating Operations:

- (1) lacquer room
- (2) lacquer booths

B. Miscellaneous Wood-working Operations:

- (1) Various Saws: 1 table saw 5 chop saws
 1 rip saw 1 bandsaw
 1 beam saw 1 notch saw
 1 swing arm saw

(2) Various Sanding Operations:

- | | |
|--------------------|-----------------|
| 1 edge sander | 1 stroke sander |
| 1 pneumatic sander | 4 hand sanders |

(3) Miscellaneous Wood-working Operations:

- | | |
|----------------|---------------|
| 2 drills | 1 shelf notch |
| 1 sharper | 3 routers |
| 1 CNC | 1 timesaver |
| 1 pocket mach | 1 pin router |
| 1 tennor | 1 bander |
| 1 4-head notch | |

3. This facility is located in a nonattainment area for PM₁₀ and located in an attainment area for the remainder of the criteria pollutants.
4. This facility is located within 100 kilometers of four (4) Class I air quality protection areas.
5. The Land Use Compatibility Statement was issued by the City of Eugene on October 27, 1997.
6. This facility is not subject to New Source Review for PM₁₀.
7. This facility is not subject to Prevention of Significant Deterioration for the affected criteria pollutants.

Synthetic Minor Limitations

8. Synthetic Minor status limits the facility to 9.5 tons/year of any single Hazardous Air Pollutant (HAP) or 24.5 tons/year of any combination of HAPs. This usage limit is required to limit the potential to emit HAP(s) to less than the Title V thresholds of 10 tons/year of a single HAP and 25 tons/year of an aggregate of HAPs.
 - A. Limits have been placed on material usage. 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/gallon of coating). The limit restricts the HAP potential emissions for each coating, diluent, glue, putty, or cleanup solvent that is delivered to the applicator, therefore restricting the potential emissions released to the atmosphere.
 - B. These limits, which prevent the facility from needing a Title V permit, were established with two criteria: monthly and annual limits to allow for seasonal flexibility. The flexibility in the limits appears in the monthly single-HAP and aggregate-HAP limits. Per usages reported for 1997, peak monthly scenarios were used to establish the monthly limits. The annual limit is more stringent than the monthly limits aggregated over a twelve-month period and, therefore, establishes the parameter which classifies the facility as an a non-affected facility with regards to 40 CFR Part 63 Subpart JJ for Wood Furniture Manufacturing. The ACDP program allows facilities to limit potential to emit, whereby the facility becomes a synthetic minor source. Because the total yearly limits for both singular and aggregate HAPs are more stringent than the aggregate of the monthly limits extrapolated for a twelve-month period, the facility will have to manage material usage such that the yearly limit is not exceeded.
 - (1) The facility has agreed to monitor its coatings, diluent, glue, putty and cleanup solvent usages such that the emissions from the use of these materials does not exceed the synthetic minor limits.
 - (2) Substitutions of coatings may be employed provided that both consumption and composition records are maintained in accordance with the permit reporting requirements.
 - C. Demonstration of compliance with the limits in Condition 3 shall classify the facility as a non-major source; therefore, the facility will be a non-affected source per the provisions of 40 CFR Part 63 Subpart JJ for Wood Furniture Manufacturing.
 - D. To confirm the composition for each coating, diluent, glue, putty, and cleanup solvent, information shall be taken from the Material Safety Data Sheets [MSDS] for each material.

- E. Special conditions in the permit require the facility to apply for a Title V permit, exclusive of excess emission incidents, if emissions increase above the Title V permit trigger levels for criteria or hazardous air pollutants.

PSEL Information

- 9. The 1997 data supplied by the facility was used to confirm and estimate the VOC and PM/PM₁₀ emissions from the various surface coating, gluing, and woodworking operations to establish the PSELs for VOC and PM/PM₁₀ emissions.
 - A. The Plant Site Emission Limitations (PSELs) for the facility restrict the potential emissions from the facility to 5.5 tons/month and 39 tons/year of Volatile Organic Compounds (VOCs). This establishes the annual limit to 1 ton below the SER trigger for PSD. The facility will be limited to 0.25 tons/month and 1.0 tons/year of PM/PM₁₀. Per the PSEL rule [LRAPA 34-060(5)(G)], the new facility PSELs were based upon application of applicable control equipment requirements and projected operating conditions.
 - B. The facility has agreed to monitor its coating, diluent, glue, putty cleanup solvent usages, and woodworking waste as collected for disposal such that the emissions from the use of these materials does not exceed the PSELs.
 - C. Substitutions of coatings may be employed provided that both consumption and composition records are maintained in accordance with the permit reporting requirements.
 - D. 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.

Baseline Emission Rate (BER)

- 10. The Baseline Emission Rate (BER) has been set at 0 tons/year. According to the DEQ/AQ Permitting and Inspection Manual: "The Baseline Emissions Rate for facilities constructed after 1978 is zero because they were not contributing to ambient concentrations during baseline year." This facility began operation in 1979.

BER: VOC = 0 tons/year
 PM = 0 tons/year
 PM₁₀ = 0 tons/year

History of Substantive Changes to the Permit

- 11. *Permit Condition No. 3:* Established a short-term Synthetic Minor limit in addition to the annual limit. This is in keeping with policy on Synthetic Minor permits.

12. *Permit Condition No. 5:* This permit condition was added as a provision of 40 CFR Part 63 Subpart JJ to clearly state that this facility is not an affected facility for the purposes of the Wood Furniture Manufacturing NESHAP. This condition is a determination made by LRAPA to conditionally classify the facility as a non-major source for the purpose of the NESHAP.
13. *Permit Condition No. 6:* Reset the Annual PSEL for PM₁₀. The previous PSEL was set at **19.0 tons/year**. This is 4 tons above the SER for PM₁₀ and would qualify the facility for New Source Review (NSR). This was changed to **1.0 ton/year** based upon best available information. This new PSEL will keep the facility well below the SER trigger to avoid NSR. Because the emissions calculations assumes that PM = PM₁₀, the PM was reset as well.
14. *Permit Condition No. 8:* The facility will have more permit flexibility with regards to limiting the HAPs in so far as the means to determine compliance with the short-term and annual HAP limits. The previous permit limited the facility such that only those HAPs which were listed in the permit (toluene, xylene, MIB Ketone, ME Ketone, Methanol, and Glycol Ether) would be allowed. The facility may need to change coating formulations during the life expectancy of the permit. By limiting the HAPs as an aggregate and by not specifying the singular HAP, the facility may switch coatings, or other HAP-containing materials as long as they provide MSDS information and do not exceed the overall limits as provided in Condition No. 3 of the permit. This is in keeping with other Synthetic Minor permits issued by LRAPA regarding permit flexibility.
15. *Permit Condition No. 9:* This condition modifies Condition 6 of the permit. Same reasoning as permit condition No. 6. The formula is in keeping with DEQ's policy for allowing flexibility of material usage for VOC-containing products.
16. *Permit Condition No. 10:* This condition is added as a stipulation for the facility if emissions from the facility exceed the permitted levels.
17. *Permit Condition No. 20:* This condition modifies previous permit Condition No. 3 of the permit. This was modified because LRAPA 32-015(b) applies to units which were installed after 1970.
18. *Permit Condition No. 21:* This condition was amended to reflect the rule language. The previous permit added language not provided for in the rule. The phrase "leaving the plant site" does not appear in the rule language. Per policy, this language has been removed from the permit.
19. The draft permit was on public notice from October 29, 2001 through November 28, 2001. No written comments were received during the 30-day comment period.

Newood Display Fixture Mfg. Company
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Expiration Date: June 24, 2005

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12/11/01