

Lane Regional Air Pollution Authority  
Synthetic Minor Air Contaminant Discharge Permit

**REVIEW REPORT**

**Peterson Pacific Corp.**

**Permit No. 206442**

General Background Information

1. Lane Regional Air Pollution Authority (LRAPA) has reviewed the permit application received on November 22, 2000. The contents of the application and subsequent correspondence with the source were the basis for the calculations contained within this review report.
2. Peterson Pacific Corp operates a heavy equipment manufacturing facility at 29408 Airport Road in Eugene, Oregon. The operation comprises the manufacture of heavy equipment used in the logging and wood recycling industries. Peterson Pacific uses 3 spray booths for painting manufactured equipment.

Emission Unit Identification

3.           SB-A:    Spray Booth  
              SB-B:    Spray Booth  
              SB-C:    Spray Booth

Reasons for Permit Issuance

4. This permit is the first air contaminant discharge permit for this facility. The potential emissions from the facility are limited to below the Title V and Prevention of Significant Deterioration (PSD) levels for VOC. The emissions of Hazardous Air Pollutants (HAPs) have been limited to nine (9) tons per year for any individual HAP and 24 tons per year for any combination of HAPs. This will limit the facility's potential emissions below the major source threshold for HAPs.
5. This source is located in an attainment area for all criteria pollutants except PM/PM<sub>10</sub>.
6. This source is located within 100 kilometers of four (4) Class I air quality protection areas.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

7. This source is not subject to PSD for the affected criteria pollutants. The limit of 39.0 tons VOC per year is below the 40 tons-per-year significance level as established in LRAPA Title 38.

#### Enforcement Actions

8. There have been no enforcement actions against this source.

#### Source Tests

9. No source testing has been performed at this facility. Material Safety Data Sheets (MSDS) and material usage are used to determine the facility's VOC emissions.

#### Synthetic Minor Limitations for Hazardous Air Pollutants (HAPs)

10. The Synthetic Minor portion of the permit limits the source's potential-to-emit to 9 tons per rolling 12-month period of any single Hazardous Air Pollutant (HAP) and 24 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. If the HAP emissions exceed these thresholds, the source will become subject to the provisions of 40 CFR Part 70, Title V Operating Permits.
  - a. The emission factor used for the HAPs assumes that 100% of the HAP component is volatile (as calculated by percent 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 effectively restrict the HAP potential to emit to less than major source thresholds.
  - b. 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 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.

#### Plant Site Emission Limits (PSELs) Information

11. PSELs for the source restrict potential emissions from the facility to 39.0 tons per year of Volatile Organic Compounds (VOCs).

Baseline Emission Rate (BER)

12. The BER has been set at 0 tons per year for all pollutants since this source was not in operation during the 1978 baseline year.

Significant Emission Rate (SER)

13. The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 38, for PM, PM<sub>10</sub>, CO, NO<sub>x</sub>, VOC, and SO<sub>2</sub> as shown below. No further air quality analysis is required for these pollutants.

Pollutant	Baseline Emissions (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	Change in PSEL (tons/yr)	Increase From Baseline (tons/yr)	SER (tons/yr)
PM	0	0	0	0	0	25
PM <sub>10</sub>	0	0	0	0	0	15
CO	0	0	0	0	0	100
NO <sub>x</sub>	0	0	0	0	0	40
VOC	0	0	39.0	39.0	39.0	40
SO <sub>x</sub>	0	0	0	0	0	40

Performance Standards and Limitations

14. The permittee is subject to the visible emissions standards in LRAPA 32-010, the particulate grain-loading standard in LRAPA 32-015, the highest and best requirement of LRAPA 32-005. Operation of well-maintained paint booth filters should assure compliance with the grain-loading and visible emissions limits. The permittee is also required to conduct inspections and maintenance of the equipment to assure compliance with the highest and best requirement.

15. The permittee is subject to the PSEL rules in LRAPA 34-060. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC are below the limits.

Monitoring, Recordkeeping and Reporting

16. The permittee is required to record all inspections and maintenance of air pollution control equipment. The permittee is also required to keep records of the amount and types of VOC- and HAP-containing materials used, the VOC and HAP compositions of each material, and calculations of VOC and HAP emissions. Semi-annual reports are required to document compliance with the HAP and VOC limits contained in the permit.

Public Notice

The draft permit was on public notice from October 29, 2001 to November 28, 2001. No written comments were received during the 30-day comment period.

DJ/bp  
12/11/01