

Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit (Simple-ACDP)

REVIEW REPORT

9 Wood, Inc.

999 South A Street
Springfield, Oregon 97477

Permit No. 209600

General Background Information

1. Lane Regional Air Protection Agency (LRAPA) has reviewed the permit applications received on July 6, 2009 and August 6, 2009. The contents of the application and subsequent correspondence with the facility were the basis for the calculations contained within this review report.
2. 9 Wood, Inc. (9 Wood or "facility") operates a suspended wood ceilings manufacturing facility at 999 South A Street Springfield, Oregon. The operation is comprised of engineering and manufacture of a variety of wood ceilings. The facility was built in August 1, 2005. 9 Wood uses one (1) spray booth for painting suspended wood ceiling components.

Emission Unit

3. #1 Paint Booth

Reasons for Permit Issuance

4. This permit is the first air contaminant discharge permit (ACDP) for this facility. The primary reason for this permit action is to issue a new ACDP.

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

5. This source is not subject to PSD for the affected criteria pollutants. The PSEL of 39 tons VOC per year is below the 40 ton per year significant emission rate (SER) as established in LRAPA Title 38. The maximum estimated annual emission of VOC in 2008 was 15.6 tons per year – less than the 40 ton/year SER in LRAPA Title 38.

Enforcement Actions

6. There have been no enforcement actions against the facility.

Source Tests

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

Hazardous Air Pollutants (HAPs)

8. Projected HAP totals for 2010 are 1.1 tons/year for total HAPs and 0.5 tons/year maximum single HAP (Toluene). For detailed emission calculations see Attachment A to this review report. These values likely represent maximum actual historical emissions. As an "area source" of HAPs the facility is not subject to any major source National Standard for Hazardous Air Pollutants (NESHAP). Also, the facility is not subject to any area source NESHAP.

Plant Site Emission Limits (PSELs) Information

9. PSELs for the source restrict potential emissions from the facility to 39 tons per year of Volatile Organic Compounds (VOCs), 9 tons per year for any single HAP and 24 tons per year for total HAPs.

Baseline Emission Rate (BER)

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

Significant Emission Rate (SER)

11. The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 38, for PM, PM₁₀, CO, NO_x, VOC, and SO₂ 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	NA	0	0	0	25
PM ₁₀	0	NA	0	0	0	15
CO	0	NA	0	0	0	100
NO _x	0	NA	0	0	0	40
VOC	0	NA	39	39	39	40
SO _x	0	NA	0	0	0	40

Performance Standards and Limitations

12. The facility 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.
13. The facility is subject to the PSEL rules in LRAPA 42-0040 and 42-0060. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC and HAPs are below the limits.

Monitoring, Recordkeeping and Reporting

14. The facility is required to record all inspections and maintenance of air pollution control equipment including the paint booth filters. The facility 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. The annual report is required to document compliance with the HAP and VOC limits contained in the permit.
15. In addition and/or including the above requirements, the facility is required to implement and maintain an LRAPA-approved Inspection and Maintenance (I&M) plan. The plan will be required to specify items such as: proper spray booth filter inspections and replacements, maintaining closed containers when not in use, proper minimization and clean-up of any spillage, proper spray gun cleaning that minimizes emissions, and inspection and maintenance.

Public Notice

The draft permit was on public notice from July 28, 2010 to September 1, 2010. No written comments were submitted during the 35-day comment period.

MTL/cmw
07/20/10

	gallons	lbs./gal	VOC reportable % by weight	lbs.	Formaldehyde (50000) % by weight	lbs.	Ethylbenzene (100414) % by weight	lbs.	MBK (108101) % by weight	lbs.	Toluene (10883) % by weight	lbs.	Xylene (130207) % by weight	lbs.	Glycol Ethers (W230) % by weight	lbs.	Total HAP lbs.
SW Vinyl Sealer T67F6	5000	7.37	27.1%	9,975	0.0%	-	0.0%	-	0%	-	0.0%	-	0.0%	-	0.0%	-	24
SW Pre-cat Lacquer T77F5x	3000	7.84	60.3%	14,178	0.1%	24	0.0%	-	0%	-	0.0%	-	0.0%	-	0.0%	-	278
SW Conversion Varnish V84P17	500	7.95	61.6%	2,448	0.0%	-	1.0%	40	0%	-	0.0%	-	6.0%	239	0.0%	-	278
SW Dye Stain S61x28	170	7.07	54.7%	658	0.0%	-	0.2%	2	0%	-	42.0%	505	1.0%	12	0.0%	-	519
SW CAB Acrylic Lacquer T75F1x	120	7.38	76.2%	675	0.0%	-	0.5%	4	0%	-	0.0%	-	3.0%	27	0.0%	-	31
SW HAPs Compliant Lacq Thinner R7K320	40	6.52	90.9%	237	0.0%	-	0.0%	-	0%	-	5.0%	13	0.0%	-	2.0%	5	18
SW Retarder Thinner K27	30	6.78	100.0%	203	0.0%	-	0.6%	1	0%	-	11.0%	22	4.0%	8	0.0%	-	68
ChemCraft Spray Stain Base 890-7277	200	6.70	10.0%	134	0.0%	-	0.0%	-	0%	-	0.0%	-	0.0%	-	0.0%	-	288
ChemCraft OptiClear 225 431-39xx	700	7.84	8.3%	453	1.0%	55	0.0%	-	0%	-	0.0%	-	0.0%	-	4.2%	233	
ChemCraft OptiClear 400 441-83xx	0	7.46	42.5%	-	0.0%	-	0.0%	-	0%	-	0.0%	-	0.0%	-	0.0%	-	-
ChemCraft ChemPro Extender 440-13xx	0	7.25	61.0%	-	0.0%	-	0.0%	-	0%	-	0.0%	-	0.0%	-	0.0%	-	-
Rudol Prothane Exterior 31-007X	200	7.44	75.5%	1,123	0.0%	-	0.0%	-	39%	580	32.0%	476	0.0%	-	0.0%	-	1,056
SW Acetone B6V9	460	6.59	0.0%	-	0.0%	-	0.0%	-	0%	-	0.0%	-	0.0%	-	0.0%	-	-
Total:	10420			30,085		78		481		580		476		285		275	2,283