

Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit

REVIEW REPORT

Armur Electrostatic Powder Coatings & Sandblasting
6191 Royal Avenue
Eugene, Oregon 97402

Permit No. 200037

PERMITTING

Permitting Action

1. This is an existing facility applying for a renewed permit. As part of this permitting action a new sandblasting booth with integrated cyclone was added to the permit. The primary reason for this permit action is to renew the expired permit.

Other Permits

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

Attainment Status

3. The facility is located in an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM₁₀.

SOURCE DESCRIPTION

Overview

4. The facility operates a sandblasting and powder-coating operation at 6191 Royal Avenue in Eugene and at various locations in Lane County. The facility controls PM (particulate matter)/PM₁₀ emissions by the use of enclosures, filters, and an integrated cyclone on Emission Unit SBR-C. Baseline Emissions were not set in the permit because the facility is well below the Significant Emission Rates as listed in Title 12 of LRAPA's Rules and Regulations.

Process and Control Devices

5. Existing air contaminant sources at the facility consist of the following:

Emission Unit	Pollutant Emitted
Three (3) Sandblasting Booths (SBR-A, SBR-B, SBR-C)	PM, PM ₁₀ , PM _{2.5}
Two (2) Powder Coating Booths (EP-1, EP-2)	PM, PM ₁₀ , PM _{2.5}
Two (2) Powder Coating Ovens (EP-3, EP-4)	PM, PM ₁₀ , PM _{2.5} , CO, NO _x

EMISSIONS

6. The pollutant of concern associated with this source type is PM/PM₁₀. The facility uses approximately 50 tons per year of sand and 2,400 pounds of powder coating per year. VOC emissions from powder coating was evaluated and determined to be negligible. Emission of CO and NOx from the powder coating ovens (EP-3 and EP-4) is expected to be less than 0.5 tons per year and therefore no PSEL in accordance with Title 42. Estimated emissions are shown in the table below:

Device/Process	Pollutant	Annual Throughput	Emission Factor	Emissions lbs/yr
Sandblasting in Booths	PM	100,000 lbs of sand	91 (lb PM/1,000 lbs Abrasive)*	9100 PM
Powder Coating	PM	2400 lbs of powder coating	90% utilization rate**	24 PM

* From AP-42, Table 13.2.6-1, Particulate Emission Factors for Abrasive Blasting.

** From AP-42 4.2.2.12-3 Metal Furniture Surface Coating.

SIMPLE PERMIT DETERMINATION

7. Lane Regional Air Pollution Authority (LRAPA) has determined that the facility qualifies as a Simple source for the following reasons:
- 7.a. Emissions from this facility 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.

NESHAPS/MACT APPLICABILITY

8. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated. The facility is not subject to 40 CFR Part 63 Subpart XXXXXX Nine Metal Fabrication and Finishing Area Source Categories (6X) because it is not primarily engaged in an activity identified in the list of Standard Industrial Classification (SIC) codes subject to this 6X. The facility is not subject to 40 CFR Part 63 Subpart HHHHHH Paint Stripping and Miscellaneous Surface Coating Operations (6H) at Area Sources because they are only engaged in powder coating and do not use spray applied coatings as defined in 6H.

NSPS APPLICABILITY

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

COMPLIANCE

10. The following enforcement actions have been taken against this facility since the last permit renewal.

Notice of Non-Compliance (NON) 2585: On May 12th, 2004 LRAPA issued NON 2585 to Armur Electrostatic Powder Coatings & Sandblasting for violations of LRAPA Title 48 Section 48-015-2-E, Adequate containment during sandblasting or other similar operations. NON 2585 was resolved through the installation of appropriate controls.

PUBLIC NOTICE

11. The draft permit was on public notice from November 28, 2011 to January 2, 2012. No written comments were submitted during the 35-day comment period.

MTL/cmw
01/04/12