

Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit

REVIEW REPORT

Metal Detectors Inc.

Permit No: 205190

PERMITTING

Permitting Action

1. The permit is a new Air Contaminant Discharge Permit (ACDP) for a "Simple – Low" source primarily of Volatile Organic Compounds (VOCs) and Hazardous Air Pollutants (HAPs).

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 is an industrial metal detector manufacturing facility located at 1001 Terry Street Eugene, Oregon 97402. The facility has no pollution control devices for VOC emissions. The facility is required to conduct monthly VOC and HAP emissions estimations to ensure compliance with the VOC PSEL and to document that actual emissions of any single HAP are less than 5 tons/year (50% of the single HAP major source threshold). This ACDP is a new permit for an existing facility. The facility operates 2080 hours per year (8 hours per day, 5 days per week, 52 weeks per year).

Process and Control Devices

5. Proposed air contaminant sources at the facility consist of the following:
 - 1 Chopped Fiberglass and Resin Spray Gun
 - 1 Hand Layup Fiberglass
 - 1 Fiberglass Layup Booth
 - 1 Paint Booth

EMISSIONS

6. The pollutant(s) of concern associated with this facility type are VOC and HAP. Emissions of PM are estimated to be negligible due to the location of the activities (inside a building) and to the limited quantity of PM/PM₁₀ expected from sawing and sanding of the fiberglass plates produced here. VOC emissions result primarily from the use of styrene-containing resins. Styrene is a VOC and a HAP. The permittee may calculate VOC/HAP emissions based product purchase records. The other criteria pollutants are emitted at negligible levels. Emission calculation details based on the highest resin usage in recent history (2006) are as follows:

| Process | Pollutant | Throughput | Lb/ton | Emissions |
|---------------------|---------------------|-------------------------|--------|-------------------------------------|
| Fiberglass-related | VOC/HAP | 20.3 tons/yr resin used | 354* | 7190 lb/year Styrene or 3.6 tons/yr |
| Particulate-related | PM/PM ₁₀ | NA | 2** | Negligible |

Assumptions:

-Resin styrene content of 50% (40-50% on MSDS)

*VOC/HAP Emission factor is from CFA (Composites Fabricators Association) from the table of Unified Emission Factors for mechanical atomized open molding

**PM emission factor is from sawmill general permit for sanderdust

-PM emissions assumed to be minimal

SIMPLE PERMIT DETERMINATION

7. The Agency has determined that the facility qualifies as a Simple Low permit for the following reasons:

7.a. Actual emissions of a single HAP are less than 5 tons/year. Should actual emissions of any single HAP exceed 50% of the major source threshold (50% of 10 tons/year any single HAP), the facility may be required to obtain a Standard ACDP.

NESHAPS/MACT APPLICABILITY

8. Based on current emission estimates of the potential to emit (PTE) less than the proposed major source threshold, there are no sources at this facility for which NESHAPS/MACT standards have been proposed or promulgated.

NSPS APPLICABILITY

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

PUBLIC NOTICE

10. The draft permit was on public notice from February 1, 2012 to March 6, 2012 and February 27, 2012 to April 2, 2012. No written comments were submitted during these 35-day comment periods.

MTL/cmw
04/12/12