Lane Regional Air Protection Agency
Synthetic Minor Air Contaminant Discharge Permit

# REVIEW REPORT

**Newood Display Fixture Mfg. Company** **Permit No. 205808**

1. General Background Information

Newood Display Fixture Mfg. Company (Newood) manufactures wood display fixtures. The facility operations include the use of four (4) coating/spray booths, one (1) drying oven, and various wood-working equipment (saws, sanders, drills, routers, banders, etc.). Dust from the wood-working activity is vented to a dust collection system that is abated by a baghouse.

The facility is located at 10 North Seneca Road in Eugene. A Land Use Compatibility Statement for this facility was issued by the City of Eugene on October 27, 1997.

2. Reasons for Permit Issuance

Newood has applied to renew Air Contaminant Discharge Permit (ACDP) No. 205808, renewal of the ACDP will not result in an increase in Plant Side Emission Limits (PSELs). The permit to be renewed includes the following attachments:

a. Addendum 1: On April 6, 2004, LRAPA approved a permit application for the addition of a fourth spray/coating booth.

b. Approval to Construct NC-205808-A05: On October 6, 2005, LRAPA authorized the use of one (new) drying oven. On October 18, 2005, Newood submitted its Notice of Completion for the new drying oven.

3. Performance Testing

There is no record of any testing performed at the facility. At this time no performance testing is required.

4. Enforcement Actions

No enforcement action has been taken against this facility in the last 5 (five) years. The last LRAPA inspection was on October 20, 2005; the facility was found in compliance.

5. Plant Site Emission Limits (PSELs)

**Synthetic Minor Limits**

The facility maintains Synthetic Minor status and has agreed to permit limits on its potential to emit at 9.0 tons per rolling 12-month period of any single Hazardous Air Pollutant (HAP) and 24.0 tons per rolling 12-month period of any combination of HAPs. These limits effectively restrict HAP emissions below the Title V thresholds of 10 tons per year for a single HAP or 25 tons per year for any combination of HAPs. Before the facility can emit HAP above these Title V thresholds, it is required to first apply for and obtain an approved Title V Operating Permit. [OAR 340-218-0010(1) and OAR 340-218-0020(1)(a)]

The following section of the review report, Plant Site Emission Limits (PSELs), provides the criteria pollutant emission rates and describes the system for determining the facility's emissions, including HAPs.

**Plant Site Emission Limits**

This facility began operation in 1979; no emissions occurred during the 1977 or 1978 baseline period. Therefore, the facility's baseline emission rate is zero. [LRAPA 34-060]

The permitted PSELs are based on maximum projected operating conditions, usage rates, material balance calculations, material composition, MSDS and permittee proposed permit limits. The following table provides the annual PSELs that will be in the permit.

| Source | $PM/PM_{10}$ (tpy) | VOC (tpy) |
|---|---|---|
| Facility Coating and Solvent Use and Drying Oven | -- | 39 |
| Woodworking Dust Colleciton System abated by a Baghouse | 1.0 | -- |
| **Total Annual PSEL** | **1.0** | **39** |

The permit conditions require the facility to track its use of materials and calculate its VOC and HAP emissions on a monthly, and on a rolling 12-month, basis.

a. VOC and HAP emissions are to be based on material balance calculations that assume 100% of the VOC and HAP in the materials used are emitted.

b. The facility is required to maintain and base its emission calculations on Material Safety Data Sheets (MSDS) that accurately detail the VOC and HAP content of each material used, including each coating, diluent, and cleanup solvent.

c. $PM/PM_{10}$ emissions after control by the baghouse are minimal, 1.0 ton per year, or less, based on an emission factor of 1.0 pounds $PM/PM_{10}$ per bone dry ton (BDT) of material (Ref.: LRAPA Permit No. 205808, issue date 6/25/00 and associated review report).

The permitted PSELs are below the Title V Major Source, Major New Source Review (NSR), and Prevention of Significant Deterioration (PSD) emission thresholds; hence these requirements are not applicable. [OAR 340-218-0020(1)(a), LRAPA 38-010, and LRAPA 38-020].

6. <u>PM Emission Limitation and Visible Emission</u>

LRAPA's process weight rule limits the emissions of particulate matter for specific processes as a function of the amount of material processed [LRAPA 32-045(A)]. $PM/PM_{10}$ emissions from this facility are less than or equal to 1 ton per year, in compliance with the process weight rule.

LRAPA Rule 32-060 for controlled dry material air conveying systems does not apply to this facility because its $PM/PM_{10}$ baseline emission rate is less than the three (3) ton per year trigger. However, the facility would comply with the 1.1 ton per year $PM/PM_{10}$ requirements in that rule.

7. Typically Achievable Control Technology (TACT)

The facility's emission units trigger TACT requirements for existing emission units that have the potential to emit equal to or greater than 5 (five) tons per year $PM/PM_{10}$ or 10 (ten) tons per year VOC [LRAPA 32-008]. The TACT requirement for VOC is the use of coatings with the lowest achievable VOC content that is compatible with the substrate being coated. The TACT requirement for $PM/PM_{10}$ is the use of baghouse control on the emissions from the dust collection system and the use of high efficiency filters in the coating spray booths.

8. New Source Review (NSR)

Emission units at this facility do not emit any pollutant at a significant emission rate; this permit action will not cause emissions to exceed the Significant Emission Rate thresholds for criteria pollutants. [LRAPA 38-005(12), 38-010 and 38-020]

9. New Source Performance Standards (NSPS) and Maximum Available Control Technology (MACT)

There have been no promulgated NSPS and/or NESHAPS/MACT regulations that apply to the rock-crushing operations at this facility.

10. Monitoring, Recordkeeping, and Reporting Requirements

The facility is required to record all inspections and maintenance performed on the baghouse and spray booth filters; to keep usage records for each VOC- and HAP-containing material(s); to maintain Material Safety Data Sheets that list the VOC and HAP content of each material, and to determine VOC and HAP emissions on a monthly and rolling 12-month basis. The facility is required to maintain semiannual emission reports that document compliance with the HAP and VOC emission limits contained in the permit. The facility is also required to submit, on an annual basis, report/records that demonstrate permit compliance as required by General Condition 13.

11. Public Notice

The draft permit was on public notice from February 13, 2006, to March 15, 2006. No written comments were received during the 30-day comment period.

SLL/bp
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