

Lane Regional Air Protection Agency

**SIMPLE  
 AIR CONTAMINANT DISCHARGE PERMIT  
 REVIEW REPORT**

Peterson Pacific Corp.  
 29408 Airport Road  
 Eugene, Oregon 97402  
 (541) 689-6520

Unassigned emissions	
Emission credits	
Source test	
COMS	
CEMS	
Compliance schedule	
Special conditions	
Annual report	X
Semi-annual report	
Quarterly report	

Monthly report	
Excess emissions report	
NSPS	
NESHAP	X
NSR	
PSD	
RACT	
FCE	
Public Notice	X

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## PERMITTING

### PERMITTING ACTION

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on December 13, 2001 and was originally scheduled to expire on December 12, 2006. The old ACDP is being converted to a Simple ACDP in accordance with the rules adopted in October 2008.

### ATTAINMENT STATUS

2. The facility is located in a non-attainment area for particulate matter (PM<sub>10</sub>) and an attainment area for ozone (O<sub>3</sub>), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), sulfur dioxide (SO<sub>2</sub>), and lead (Pb).

## SOURCE DESCRIPTION

### OVERVIEW

3. The facility 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. The facility was built in 1993.
4. The following changes have been review and authorized with the permit renewal process:

Date	Permit Revision or Notification	Brief Explanation
6/10/2008	Construction Application	Addition of Messer Titan 2 14/4 burn table for cutting raw steel into parts used in the manufacturing process.
6/10/2008	Construction Application	Addition of Whitney plasma punch burn table for cutting raw steel into parts used in the manufacturing process

### PROCESS AND CONTROL DEVICES

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

#### Device/Process:

EU ID	Description	Control	Date Installed
SB-A	Spray Booth (East)	Spray booth filter system	1995
SB-B	Spray Booth (Open)	Spray booth filter system	1999
SB-C	Spray Booth (West)	Spray booth filter system	1999

EU ID	Description	Control	Date Installed
BT-A	Burn Table (Messer)	Baghouse	June 2008
BT-B	Burn Table (Kinetic)	Water Table	July 2007
BT-C	Plasma Punch (Whitney)	Baghouse	March 2007

## COMPLIANCE

6. Since the last permit renewal, the facility was inspected and found to be in compliance with permit conditions on the following dates:

6/2/2004      4/15/2005      1/12/2006      7/1/2008

7. During the prior permit period there were no complaints recorded for this facility.
8. The following enforcement actions have been taken against this facility since the last permit renewal.

Notice of Civil Penalty (NCP) No. 05-2816: On October 5, 2005 LRAPA issued (NCP) No. 05-2816 in response to Non-Compliance (NON) No. 05-2816. A penalty in the amount of \$1200.00 was imposed and paid for the violations of HAP synthetic minor limitations. Peterson emitted 9.86 ton of methyl ethyl ketone (MEK) for the period of January 1, 2003 through December 31, 2003 against a permit limit of 9 tons.

Notice of Non-Compliance (NON) 05-2703: On June 22, 2004 LRAPA issued (NON) 2703 to Peterson Pacific for permit violations of condition 3, monitoring for HAP limits, condition 10, exceeding plant site emission limit (PSEL) and conditions 12 and 13 regarding monitoring, recordkeeping and reporting. The PSEL exceedance was addressed in NON/NCP 05-2816

## EMISSIONS

9. Proposed PSEL information:

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 <sub>10</sub>	0	NA	0	0	0	15
CO	0	NA	0	0	0	100
NO <sub>x</sub>	0	NA	0	0	0	40
VOC	0	39	39	0	39	40
SO <sub>x</sub>	0	NA	0	0	0	40

- a. The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with 37-0064(4)(b) and the netting basis is zero in accordance with 37-0040(2).
- b. Historical emissions for the source were as high as 21.57 ton per year VOC most of which HAPs. Since then the permittee has changed paint formulation and rule changes have delisted the predominant emitted HAP of MEK.
- c. The PSEL is a federally enforceable limit on the potential to emit.

### SIGNIFICANT EMISSION RATE ANALYSIS

10. This facility was constructed after the baseline period and has not undergone permitting actions that result in a netting basis for future permit actions. The proposed PSEL is less than the VOC significant emission rate of 40 ton per year, thus no further air quality analysis is required.

### MAJOR SOURCE APPLICABILITY

#### CRITERIA POLLUTANTS

11. A major source is a facility that has the potential to emit more than 100 tons per year of any criteria pollutant. This facility is not a major source of criteria pollutant emissions.

#### HAZARDOUS AIR POLLUTANTS

12. The HAP totals for 2009 are 0.11 tons/year for total HAPs and 0.07 tons/year maximum single HAP (Xylene). These values are expected to remain in this range during future operations with minor production based variation. Historically higher emissions were reduced through paint and solvent formulation changes. A major source is a facility that has the potential to emit more than 10 tons/year of any single HAP or 25 tons/year of combined HAPs. This facility is not a major source of hazardous air pollutants. As an "area source" of HAPs the facility is not subject to any major source National Standard for Hazardous Air Pollutants (NESHAP). The facility is subject to the area source NESHAP for Metal Fabrication and Finishing Source Nine Categories (40CFR63 Subpart XXXXXX).

Hazardous Air Pollutant	July 2005 to June 2006 Emission Rate (tons/year)	2009 Emission Rate (tons/year)
1,2,3 Trimethylbenzene	0.50	0.00
Ethyl Benzene	1.49	0.01
Formaldehyde	0.00	<0.01
Glycol Ether	0.70	0.00
Methanol	0.06	0.00
Methyl Isobutyl Ketone	0.04	0.02

Hazardous Air Pollutant	July 2005 to June 2006 Emission Rate (tons/year)	2009 Emission Rate (tons/year)
Phenol	0.00	<0.01
Styrene	0.00	<0.01
Toluene	1.06	0.00
Triethylamine	0.11	0.00
Xylene	3.91	0.07
Total	8.05	0.11

## ADDITIONAL REQUIREMENTS

### NSPS APPLICABILITY

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

### NESHAPS/MACT APPLICABILITY

14. 40 CFR Part 63, Subpart XXXXXX Nine Metal Fabrication and Finishing Source Categories Area Source NESHAP is applicable to the source because the facility's primary activities are classified under the SIC code 3531, an SIC code listed as one of the nine source categories specifically addressed by this rule. The facility engaged in all of the activities covered by this NESHAP including dry abrasive blasting, machining, dry grinding and polishing with machines, painting, and welding. The facility is expected to be in compliance on or before the compliance date of this rule. This rule has an effective compliance date of July 25, 2011.

### TACT APPLICABILITY

15. The facility is meeting the states TACT Rules by using HVLP paint guns, filters on the blasting and painting booths, and the use of baghouse control on metal cutting tables. This equipment is considered TACT by LRAPA.

## SOURCE TESTING

### PRIOR TESTING RESULTS

16. There have been no source tests required, nor performed at this facility.

## PUBLIC NOTICE

17. Pursuant to 37-0064(5)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with 31-0030(3)(b), which requires that LRAPA provide notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments. **The public notice was published on April 30, 2010 and the comment period ended on June 4, 2010. No comments were received and no public hearing was requested.**

mtl:cmw