

Lane Regional Air Protection Agency
Minimal Source Air Contaminant Discharge Permit

REVIEW REPORT

Pierce Manufacturing Co., Inc.

Permit No. 206405

PERMITTING

Permitting Action

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on January 1 2003, and was originally scheduled to expire on December 31, 2007. No changes have been made to the permit since the last renewal.

Other Permits

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

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 galvanizing operation at 10 North Garfield Street in Eugene. The facility controls PM (particulate matter)/PM₁₀ emissions by the use of four (4) baghouses. Other specific emission sources include:
 - Two (2) zinc dip tanks,
 - One (1) natural gas-fired boiler,
 - Two (2) natural gas-fired ovens, and
 - One (1) adhesive spray booth.
 - Three (3) iron dust baghouses
 - One (1) epoxy reclaim baghouse

The facility was issued its first ACDP in 1974. Baseline Emissions were not set in the permit because the facility is well below the Significant Emission Rates (SERs) as listed in Title 38 of LRAPA's Rules and Regulations. The facility operates 2,080 hours per year (10 hours per day, 4 days per week, 52 weeks per year).

EMISSIONS

5. The pollutants of concern associated with this facility type are zinc, epoxy dust, and emissions from natural and diesel gas combustion. Emissions of the above pollutants are expected to be minimal. Thorough research was conducted to estimate the emissions for the source but no emission factors were available. Other estimation methods including material balance were considered but the information necessary to do this type of analysis was unattainable. The attachment to this review report contains emissions estimates for the facilities natural gas and diesel combustion calculations.

6. Lane Regional Air Protection Agency (LRAPA) has determined that the facility qualifies as a minimal source for the following reasons:
- 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.
 - b. The facility was inspected on January 16, 2008, and found to be in compliance with permit conditions.

RECORD KEEPING

7. A record of the following data shall be maintained for a period of two (2) years at the plant site and shall be available for inspection by authorized representatives of LRAPA:

	<u>Parameter</u>	<u>Minimum Recording Frequency</u>
a.	Baghouse maintenance	On occurrence
b.	Amount of epoxy used	Monthly

SPECIAL CONDITIONS

8. There are no special conditions specified in the permit.

NESHAPS/MACT APPLICABILITY

9. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

NSPS APPLICABILITY

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

PUBLIC NOTICE

11. The draft permit was on public notice from March 18, 2008 to April 17, 2008. No written comments were submitted during the 30-day comment period.

Max/rcf
4/18/08