

Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit (Simple-ACDP)

REVIEW REPORT

Waterdog Surface Technologies

90554 Highway 99 North
Eugene, Oregon 97402

Permit No. 208944

General Background Information

1. Lane Regional Air Protection Agency (LRAPA) has reviewed the permit application received on November 12, 2008. The contents of the application and subsequent correspondence with the facility were the basis for the calculations contained within this review report.
2. Waterdog Surface Technologies (Waterdog or "facility") operates an archery products manufacturing facility at 90554 Highway 99 North in Eugene, Oregon. The operation comprises surface coating of bows. The facility is a subsidiary of Savage Arms, Inc, a Westfield, MA company. Waterdog uses three (3) spray booths for painting manufactured equipment.

Emission Point Identification

3. #1 Basecoat Booth Exhaust Stack
#2 Topcoat Booth Exhaust Stack
#3 Topcoat Booth Exhaust Stack

Reasons for Permit Issuance

4. This permit is the first air contaminant discharge permit (ACDP) for this facility. Prior to 2005 LRAPA was in contact with the facility regarding air permitting requirements, but at that time production and emissions were such that an ACDP was not required. Prior to 2005 the coating operations were performed at a facility outside of Oregon. About January 2005 the existing coatings line was installed at the facility and in 2008 LRAPA received information of substantial containers of coatings and solvents stored onsite. On July 15, 2008 LRAPA performed an unannounced inspection and advised the facility that observations indicated probability that an ACDP was required. The primary reason for this permit action is to issue a new ACDP.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

5. This source is not subject to PSD for the affected criteria pollutants. The PSEL of 39 tons VOC per year is below the 40 ton per year significant emission rate (SER) as established in LRAPA Title 38. The maximum estimated annual emissions of VOC that occurred between 2005 and 2008 were 35.7 tons per year (in 2007) – less than the 40 ton/year SER in LRAPA Title 38.

Enforcement Actions

6. The facility was issued Notice of Non-Compliance (NON No. 3016) on November 28, 2008, for failure to submit construction notice prior to constructing or modifying an air contaminant source and operating an air contaminant source without first obtaining an ACDP.

Notice of Violation (NOV) and Notice of Civil Penalty (NCP) No. 09-3016 was issued to the facility on February 2, 2009. The NCP included a total civil penalty and economic benefit amount of \$12,813. LRAPA and the facility agreed to settle the violation for the amount equivalent to the total economic benefit for constructing and operating an air contaminant source without the required permits (\$8,913). On August 18, 2009 the facility paid the \$8,913 and the violation was closed.

Source Tests

- No source testing has been performed at this facility. Material Safety Data Sheets (MSDS), Certified Product Data Sheet, and material usage are used to determine the facility's VOC and HAP emissions.

Hazardous Air Pollutants (HAPs)

- Projected HAP totals for 2007 are 5.7 tons/year for total HAPs and 3.7 tons/year maximum single HAP (Toluene). These values likely represent maximum actual historical emissions. As an "area source" of HAPs the facility is not subject to any major source National Standard for Hazardous Air Pollutants (NESHAP). Also, the facility is not subject to any area source NESHAP including the Metal Fabrication and Finishing Source Nine Categories (Subpart XXXXXX).

Plant Site Emission Limits (PSELs) Information

- PSELs for the source restrict potential emissions from the facility to 39 tons per year of Volatile Organic Compounds (VOCs), 9 tons per year for any single HAP and 24 tons per year for total HAPs.

Baseline Emission Rate (BER)

- The BER has been set at zero (0) tons per year for all pollutants since this source was not in operation during the 1978 baseline year.

Significant Emission Rate (SER)

- The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 38, for PM, PM₁₀, CO, NO_x, VOC, and SO₂ as shown below. No further air quality analysis is required for these pollutants.

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 ₁₀	0	NA	0	0	0	15
CO	0	NA	0	0	0	100
NO _x	0	NA	0	0	0	40

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)
VOC	0	NA	39	39	39	40
SO _x	0	NA	0	0	0	40

Performance Standards and Limitations

12. The facility is subject to the visible emissions standards in LRAPA 32-010, the particulate grain-loading standard in LRAPA 32-015, the highest and best requirement of LRAPA 32-005. Operation of well-maintained paint booth filters should assure compliance with the grain loading and visible emissions limits. The permittee is also required to conduct inspections and maintenance of the equipment to assure compliance with the highest and best requirement.
13. The facility is subject to the PSEL rules in LRAPA 42-0040 and 42-0060. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC and HAPs are below the limits.

Monitoring, Recordkeeping and Reporting

14. The facility is required to record all inspections and maintenance of air pollution control equipment including the paint booth filters. The facility is also required to keep records of the amount and types of VOC- and HAP-containing materials used, the VOC and HAP compositions of each material, and calculations of VOC and HAP emissions. Semi-annual reports are required to document compliance with the HAP and VOC limits contained in the permit.

In addition and/or including the above requirements, the facility is required to implement and maintain an LRAPA-approved Inspection and Maintenance (I&M) plan. The plan will be required to specify items such as: proper spray booth filter inspections and replacements, maintaining closed containers when not in use, proper minimization and clean-up of any spillage, proper spray gun cleaning that minimizes emissions, and inspection and maintenance.

Public Notice

15. The draft permit was on public notice from October 15, 2009 to November 18, 2009. No written comments were submitted during the 30-day comment period.

Max/cmw
11/24/09

Customer: BOW TECH
 Mike Cole
 96354 HWY 99 N
 Phone: 541-284-1711
 Fax: 541-284-4712

City: EUGENE State: OR Zip: 97402

Date Printed: 8/4/2008
 Run Date: 8/4/2008

Product Summary:

Product ID	Description	Total Solid	Units	Lbs/Gal	% Vol Solids	VOC Lbs/Gal	Total Lbs Solids	Total Lbs VOC	#VOC/Solids	Total Lbs HAPs	#HAPs/Solids	Total Lbs VtHAPs	#VtHAPs/Solids	% VOC Exempt
A280020	HC FLAT GREEN W/8 TOUCH-UP	1.00	GAL	9.04	37.43	0.95	3.38	0.95	0.28	0.02	0.00	0.02	0.00	0.00
A280022	HC FLAT BLACK W/8 TOUCH-UP	1.00	GAL	8.88	35.61	0.95	3.16	0.95	0.30	0.01	0.00	0.01	0.00	0.00
E304017AK	HC HARDWOOD GREY HD BASECOAT	1,133.50	GAL	8.93	37.22	5.57	3768.31	6315.24	1.68	861.62	0.23	861.39	0.23	0.16
E304019AK	HC MAT GRAY #3	54.00	GAL	8.73	35.11	5.63	165.53	308.97	1.88	41.17	0.23	41.17	0.23	0.11
E308020AK	HC 1010 FINISH	16.50	GAL	7.84	22.39	6.04	28.96	99.75	3.46	10.11	0.35	10.11	0.35	0.12
E308023AK	HC TREE STAND BIC	6.00	GAL	9.55	40.29	5.66	23.08	33.99	1.48	1.66	0.07	1.66	0.07	0.09
E30C002AK	HC GLOSS URETHANE	76.00	GAL	8.12	32.86	5.42	202.70	412.08	2.04	47.62	0.23	47.62	0.23	0.11
E30C007AK	HC LOW SHEEN UV RESISTANT VINYL TOPCOAT	2,396.50	GAL	7.96	19.50	6.36	3710.57	15249.96	4.12	1143.83	0.31	1143.83	0.31	0.11
E30C010AK	HC 70 SHEEN UV RESISTANT VINYL TOPCOAT	14.50	GAL	7.90	18.75	6.38	21.48	92.45	4.33	6.82	0.32	6.82	0.32	0.12
E30C016AK	HC 25 SHEEN UV RESISTANT VINYL TOPCOAT	14.50	GAL	7.76	17.43	6.36	19.60	92.26	4.73	6.83	0.35	6.83	0.35	0.11
E30C018BAK	HC SOFT FEEL URETHANE	1,137.00	GAL	8.35	42.30	4.80	4086.20	5554.19	1.30	0.00	0.00	0.00	0.00	0.00
E30C0192AK	HC SOFT FEEL 3K URETHANE	4.00	GAL	8.39	43.73	4.70	14.68	18.80	1.29	0.00	0.00	0.00	0.00	0.00
E30C0193AK	HC SOFT FEEL 2K URETHANE	4.00	GAL	8.36	42.97	4.75	14.37	18.98	1.33	0.00	0.00	0.00	0.00	0.00
E30C0194AK	HC SOFT FEEL 2K URETHANE	5.00	GAL	8.36	42.39	4.79	17.76	22.93	1.35	0.00	0.00	0.00	0.00	0.00
E30C0196AK	HC SOFT FEEL 2K URETHANE	667.00	GAL	8.36	43.99	4.66	2449.44	3110.79	1.28	0.00	0.00	0.00	0.00	0.00
E30C0193AK	HC TIMBER HD	55.00	GAL	8.58	32.33	5.77	132.55	317.19	2.09	37.64	0.23	37.64	0.23	0.12
E30C0193AK	HC NEW BREAK-UP BASECOAT	869.00	GAL	8.82	36.50	5.57	2799.11	4837.39	1.74	727.46	0.26	727.42	0.26	0.11
E30C0194AK	HC SKYLINE EXTREME BASECOAT	1,160.00	GAL	9.28	40.81	5.46	4593.74	6331.97	1.45	855.87	0.19	855.84	0.19	0.10
E30C0197AK	HC SECLUSION BASECOAT	78.50	GAL	8.94	36.96	5.60	259.35	430.44	1.70	60.06	0.23	60.06	0.23	0.11
E30C0196AK	HC AP GREEN BIC	329.00	GAL	9.22	37.03	5.77	1123.02	1898.09	1.70	179.80	0.16	179.80	0.16	0.08
E30C0196AK	HC TIMBER FLAT HD	279.00	GAL	8.91	36.72	5.60	912.34	1562.05	1.72	183.36	0.20	183.36	0.20	0.11
E30C0193AK	HC GREEN BIC	4.50	GAL	8.76	34.09	5.74	13.44	25.82	1.93	1.32	0.10	1.32	0.10	0.11
E30K010AK	HC FLAT BLACK BASECOAT	161.00	GAL	8.44	31.83	5.33	432.24	858.70	2.00	152.13	0.35	152.13	0.35	0.66

EMHNB2AK	HC ADVANTAGE BASECOAT CONP. A	31.50	GAL	8.98	36.30	5.12	186.37	161.44	1.50	33.04	0.30	33.04	0.30	4.32
EMHNB3AK	HC DARK SHADOW GRASS	14.00	GAL	9.02	36.54	5.13	46.67	71.85	1.48	13.16	0.27	13.16	0.27	4.30
EMHNB5AK	HC HARDWOOD GREEN & GRAY B/C	1.34700	GAL	9.91	47.14	4.68	6293.08	6299.97	1.01	1102.34	0.18	1101.79	0.18	5.45
EMHNB6AK	HC NEW ADVANTAGE B/C	3.4550	GAL	8.77	34.98	5.27	1060.34	1821.43	1.73	280.78	0.27	280.74	0.27	4.65
EMHNB7AK	HC CHERRY CARRIE	15.00	GAL	7.93	26.77	5.77	31.84	86.57	2.73	8.91	0.28	8.91	0.28	0.10
EMHNB9AK	HC PINK B/C	3.00	GAL	8.73	33.05	5.81	8.65	17.42	2.02	1.49	0.17	1.49	0.17	0.09
EMHNB1AK	HC WFT-208 GENERATION	1.00	GAL	8.91	34.32	5.79	3.07	5.79	1.89	0.31	0.10	0.31	0.10	0.11
EMHNB7AK	HC FLAT WHITE B/C	5.00	GAL	8.93	37.03	5.59	16.54	27.93	1.70	3.31	0.20	3.31	0.20	0.11
EMHNB6AK	HC NEW COKE SILVER	112.50	GAL	7.93	22.26	6.13	198.57	689.09	3.49	71.01	0.36	71.01	0.36	0.12
M59CU112	HC ALPHATIC HARDENER	563.50	GAL	8.66	60.81	3.45	2927.62	1941.40	0.67	5.85	0.00	5.85	0.00	0.00
M59CU164	HC SOFT FEEL HARDENER	228.00	GAL	8.92	53.98	4.08	1097.23	930.96	0.85	9.14	0.01	9.14	0.01	0.01
M59CU170	HC ALPHATIC SOFT FEEL HARDENER	173.00	GAL	8.35	48.90	4.25	714.96	743.56	1.05	1.05	0.00	1.05	0.00	0.00
M6NCU131	CLEAR HYDRO-GRAPHC ACTIVATOR	88.00	GAL	8.44	29.70	5.91	220.60	519.74	2.37	367.84	1.67	367.84	1.67	1.67
P71CU020	POLYPROPYLENE PRIMER	199.50	GAL	7.32	5.00	6.92	72.98	1379.92	19.00	1386.57	19.00	1386.57	19.00	19.00
T84CU123	Slow Liqueur Resin	328.00	GAL	8.11	0.00	8.07	0.00	2646.59	0.00	0.00	0.00	0.00	0.00	0.00
T84CU268	T84CU268 BUTYL CARBITOL ACETATE	273.00	GAL	8.20	0.00	8.16	0.00	2227.81	0.00	2238.55	0.00	2238.55	0.00	0.00
T84CU326	HC REDUCER	2,380.00	GAL	6.66	0.00	1.78	0.00	4242.35	0.00	1541.44	0.00	1541.44	0.00	0.00
	Sub Total:	14,596.00					37,428.64	71,408.72	2.17	11,393.15	0.67	11,392.22	0.67	73.00
	Grand Total:						37,428.64	71,408.72	2.17	11,393.15	0.67	11,392.22	0.67	

Some products may contain no solids (0%) or very low levels such as thinners and NGR solms. When Lbs. solids = 0 or is very low, the ratios of Lbs. VOC/bs. solids, Lbs. HAP/bs. solids and the VHA/bs. solids cannot be calculated.

For more information contact the RPA Wood Finishes Group Environmental Health & Safety Department at 828-728-8266 ext.1830 or Laboratory at 828-728-8266 ext.1801

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