Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit

REVIEW REPORT

Western Pneumatics, Inc. **Permit No. 208929**

1. General Background Information

Western Pneumatics, Inc. operates a painting operation in Eugene, Oregon. The operation consists of a paint booth, and a sand blasting shop. The facility operates approximately 4,160 hours per year (16 hours per day, five (5) days per week, and 52 weeks per year).

2. Reasons for Permit Issuance

This facility is listed in LRAPA Rules and Regulations, Title 37, Table 1, Part B and Part C and, therefore, is required to have a Standard Air Contaminant Discharge Permit (ACDP). This is an existing facility applying for a renewed permit. The facility's permit expired on April 13, 2010. The primary reason for this permit action is to renew the expired permit.

3. Performance Testing

No performance testing has been completed by this facility. At this time performance testing is not required.

4. Enforcement Actions

There have been no enforcement actions against the facility.

5. Plant Site Emission Limits (PSELs)

The regulated pollutants emitted from processes at this facility are volatile organic compounds (VOCs), of which hazardous air pollutants (HAPs) are a subset, and particulate matter (PM, PM_{10}, $PM_{2.5}$)

Baseline Emissions

The facility did not exist during the baseline period (1978). Baseline emissions are set at zero (0) tons per year for PM, PM_{10}, SO_2, NO_X, and VOC.

Plant Site Emission Limits (PSELs)

Projected VOC/HAP emissions were calculated based on mass balances using MSDS sheets as reference. Should the facility wish to increase production, the facility will have to apply for a permit modification, including a new assessment of fees.

The PSEL for the facility restricts potential emissions from the facility to 39 tons per 12-month rolling period of VOCs (this allows the facility to emit up to one (1) ton below the Significant Emission Rate (SER) for VOCs). The facility is also required to limit Hazardous Air Pollutant

(HAP) emissions to nine (9) tons of any single HAP and 24 tons of any combination of HAPs per 12-month rolling period.

The following PSELs are proposed.

Annual (12 month rolling) PSEL (tons)

Source	VOC	Single HAP	Total HAP
Painting Operations	39	9	24

The facility is required to calculate VOC and HAP emissions to ensure compliance with the permit PSELs and conditions.

6. PM Emission Limitation and Visible Emission

LRAPA's process weight rule limits emissions of PM for specific processes as a function of the amount of material processed. [LRAPA 32-045(A)] Since the facility is expected to emit minimal amounts of PM, the facility is expected to be in compliance with the process weight rule.

The permit contains limits on grain loading and visible emissions.

7. Pollution Controls and Typically Achievable Control Technology (TACT)

LRAPA Title 32-008 requires an existing emission unit at a facility to meet TACT if the emissions unit has emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutant or five (5) tons per year of particulate, the emissions unit is not subject to the emissions standards under LRAPA Title 32, Title 33, Title 39, or Title 46 for the pollutants emitted, and the facility is required to have a permit. The facility emits greater than ten (10) tons per year of VOC and is, therefore, required to meet TACT. The facility uses air-assisted airless sprayers, this equipment is considered TACT by LRAPA.

8. New Source Review (NSR)

Because the proposed PSELs for all regulated pollutants are below the Significant Emission Rates (SERs) in LRAPA Title 38, the facility is not subject to LRAPA's New Source Review (NSR) requirements for PM_{10} nor the Prevention of Significant Deterioration (PSD) requirements for SO_X, NO_X, CO, and VOC.

9. New Source Performance Standards (NSPS)

According to LRAPA Title 46 (Section 46-714), affected facilities which are not located at a major source are not subject to NSPS. Since this facility is not a major source, and since it does not operate any affected facilities it is not subject to NSPS.

10. National Emission Standards for Hazardous Air Pollutants (NESHAP)

40 CFR Part 63, Subpart XXXXXX (6X) Nine Metal Fabrication and Finishing Source Categories Area Source NESHAP is applicable to the source because the facility's primary activities can be classified under the SIC code 3499, 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.

11. Monitoring and Recordkeeping Requirements

The facility is required to maintain records of the following information:

Monthly usage of all VOC/HAP-containing materials. These records are to include gallons of material used, density of material (pounds per gallon), VOC/HAP content (% by weight), and type of VOC/HAP material used (per MSDS referencing). Amount of material used may be obtained from paint supplier's records of materials purchased.

12. A semi-annual report to document compliance with the Plant Site Emission Limits (PSELs) is to be submitted. The report will contain the VOC emission data as required per permit Conditions 6 and 10. The report will also document any new materials used the facility and shall provide updated or new MSDS as requested.

The semi-annual report will include the 12-month total HAP emission data as required per permit Condition 3. Additionally, the report will identify the individual HAP emitted at the highest level for each month and provide the monthly emission total for that HAP.

The semi-annual report is due thirty (30) days after the end of each 6-month calendar period (January through June and July through December).

13. The semi-annual report due January 30th is to include the information as required per permit General Condition G13.

14. Public Notice

The draft permit was on public notice from August 24, 2010 to September 27, 2010. No written comments were submitted during the 35-day comment period.

MTL/cmw
11/19/10

Review Report Appendix A
Emissions Summary
Western Pneumatics, Inc.
Permit Application Data 2010

	June 2010 Annual/Running Totals	HAPS (lbs/yr)	VOC'S (lbs/yr)		
526-73-8	1.2.3 TRIMETHYLBENZENE	215.01	215.01		
67-64-1	ACETONE			8287.45	TOTAL
64742-95-6	AEROMATIC HYDROCARBONS		21.62		
64742-89-8	ALIPHATIC PETROLEUM DISTILLATES				
123-86-4	BUTYL ACETATE/N-BUTYL ACETATE		220.16		
71-36-3	BUTYL ALCOHOL/BUTANOL	220.16	220.16		
64-17-05	ETHANOL		1.27		
110-10-5	ETHYL BENZENE	1250.29	1250.29		
111-76-2	ETHELENE GLYCOL MONOBUTYL ETHER		57.84		
N230	ETHELENE GLYCOL MONOPROPYL ETHER				
N230	GLYCOL ETHER		77.17		
N230	GLYCOL ETHER EB ACETATE		0.21		
28182-81-2	HEXAMETHYLENE DIISOCYNATE		27.41		
78-83-1	ISOBUTYL ALCOHOL		442.23		
97-85-8	ISOBUTYL ISOBUTYRATE		0.63		
67-63-0	ISOPROPYL ALCOHOL		18.49		
67-56-1	METHANOL		0.43		
78-93-3	METHYL ETHYL KETONE	517.49	517.49		
108-10-1	METHYL ISOBUTYL KEYTONE	3.90	3.90		
64741-65-7	MINERAL SPIRITS		605.14		
8052-41-3	MINERAL SPIRITS		0.77		
1569-01-3	PROPOXYPROPANOL		30.75		
108-38-3	1-METHOXY-2-PROPANOL ACETATE		1.52		
108-65-6	PROPYLENE GLYCOL METHYL ETHER ACETATE				
100-42-5	STYRENE	6.49	6.49		
108-83-3	TOLUENE	232.84	232.84		
121-44-8	TRIETHYLAMINE		30.75		
8032-32-4	VM&P NAPHTHA		977.71		
1330-20-7	XYLENE	5852.28	5852.28		
	TOTAL	8298.46	10812.55		
	TOTAL (tons/yr)	4.15	5.41		

Western Pneumatics Particulate (PM) Matter Calculation

Welding Welding Rod Type	Usage lbs wire/rod	Emission Factor lbs PM_{10}/1000 lbs Wire/Rod	EF Source	PM_{10} emissions
Stainless (308L, 309L, 316L, 308LSi, 309LSi, 316LSi)	3069	5.4	AP-42 Table 12.19-1 (GMAW for 308L)	17
Flux Coveshield	2377	81.6	AP-42 Table 12.19-1 (SMAW for 14Mn-4Cr*)	194
Flux Cored Electrode (E71T)	2484	12.2	AP-42 Table 12.19-1 (GMAW for E71T)	30
Mig Wire mild carbon steel electrode (E70S)	4843	5.4	AP-42 Table 12.19-1 (GMAW for E70S)	26
Sandblasting	Usage lbs sand used	Emission Factor lbs PM_{10}/1000 lbs Sand	EF Source	PM_{10} emissions
Green Diamond	294000	0.69		203
			Total lbs PM_{10}	470

* Used highest emission factor in AP-42 Table 12.19-1 because it was unclear what catergory this product falls into. Even with the overestimation the PM_{10} emissions are less than the de minimis level of one (1) ton per year.