

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

**REVIEW REPORT**

**Whittier Wood Products Company**  
3787 West First Avenue  
Eugene, Oregon 97402

**Permit No. 208894**

General Background Information

1. Lane Regional Air Protection Agency (LRAPA) has reviewed the permit applications received on October 15, 2007 and June 6, 2011. The contents of the application and subsequent correspondence with the facility were the basis for the calculations contained within this review report.
2. Whittier Wood Product Company (Whittier or "facility") operates a furniture manufacturing facility at 3787 West First Avenue in Eugene, Oregon 97402. The current operation is comprised of bookcase production, some repair work, and product development. The facility was built in 1975. Whittier uses four (4) paint booths for painting bookshelves and repaired components.

Emission Units

3. Existing:
  - #2 & #3 Carter Day Baghouses (in series) (60,000 acfm) (currently inactive at time of renewal)
  - #1 Paint Booth
  - #2 Paint Booth
  - #3 Paint Booth
  - #4 Paint Booth

Removed from permitted emissions units:

- #1 Carter Day Baghouse (inactive) (25,000 acfm)
- #6 Carter Day Baghouse (inactive) (40,000 acfm)
- #4 Carter Day Baghouse (removed July 2007) (50,000 acfm)
- #5 Carter Day Baghouse (removed December 2009) (30,000 acfm)
- Planner, Sander, and Moulder (to CD#2&3)

Reasons for Permit Issuance

4. This action is a renewal of Air Contaminant Discharge Permit (ACDP) 208894 which was originally issued July 1, 1981, reissued July 1, 1986, August 2, 1996 and August 1, 2001, and expired on August 1, 2006. The facility operates a process listed in Title 37, Table 1, Part B (B. 72 – Wood Furniture and Fixtures 25,000 or more bd. ft./maximum 8 hr. input) and is therefore required to obtain an ACDP. The permit type has been changed to a "Simple "High"" from a "Synthetic Minor" as part of this renewal, in accordance with Section 37-0025 of Title 37, "Air Contaminant Discharge Permits" of LRAPA's Rules and Regulations, and as part of the LRAPA ACDP rule changes in October 2008. The facility is not required to obtain a Standard ACDP because the facility no longer has actual emissions above the 50% of the HAP major source thresholds.

### 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 estimated actual annual emissions of VOCs in 2010 were 9.3 tons per year – less than the 40 ton/year SER in LRAPA Title 38.

### Enforcement Actions

6. There have been no enforcement actions against the facility since the last permit renewal.

### Source Tests

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

### Hazardous Air Pollutants (HAPs)

8. HAP totals for 2010 are 0.6 tons/year for total HAPs and 0.4 tons/year maximum single HAP (Toluene). Historically, the emissions were much higher, however, due to permanent changes in operations at the facility, the current values likely represent actual expected emissions. Because the HAP emissions are significantly less than 50% of the "major source" thresholds, no synthetic minor limitations are included in the renewed permit. 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.

### Plant Site Emission Limits (PSELS) Information

9. PSELS for the source restrict potential emissions from the facility to 39 tons per year of Volatile Organic Compounds (VOCs), 24 tons per year of particulate matter (PM), 14 tons per year of particulate matter less than 10 microns in diameter (PM<sub>10</sub>), 9 tons per year of particulate matter less than 2.5 microns in diameter (PM<sub>2.5</sub>). VOC emission totals for 2010 were 9.3 tons/year. No PM/PM<sub>10</sub>/PM<sub>2.5</sub> emission totals for 2010 were available, however, emissions from a source of this size and capacity are expected to be minimal. The permittee will be recording wood waste throughput during this permit term to affirm this assumption. Historically, VOC and PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions were much higher, however, due to permanent changes in operations at the facility, the current values likely represent actual expected emissions.

### Baseline Emission Rate (BER)

10. The BER has been reduced to zero (0) tons per year for all pollutants from 13.0 tons/yr PM/PM<sub>10</sub> and 9.6 tons/yr VOC. The reduction was done because this source has elected to operate under a "Simple" air contaminant discharge permit which does not include a baseline.

### Significant Emission Rate (SER)

11. The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 128, for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>x</sub>, VOC, GHG, and SO<sub>2</sub> 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	23.7	24	+0.3	24	25
PM <sub>10</sub>	0	23.7	14	-9.7	0	15
PM <sub>2.5</sub>	NA	NA	9	9	9	10
CO	0	NA	NA	0	0	100
NO <sub>x</sub>	0	NA	NA	0	0	40
VOC	0	48.6	39	-9.6	39	40
SO <sub>x</sub>	0	NA	NA	0	0	40
GHG	0	NA	NA	0	0	75,000

Performance Standards and Limitations

12. As part of this renewal the synthetic minor limitations were removed from the permit based on changes that have occurred in Whitter's operations that no longer warrant a synthetic minor limitation. The company relocated a large part of their operations out of the area and current operation emits less than 50% of the major source threshold for HAPs.
13. 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 and baghouse 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.
14. The facility is subject to the PSEL rules in LRAPA 42-0040 and 42-0080. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC is below the limit.

Pollution Controls and Typically Achievable Control Technology (TACT)

15. LRAPA Title 32-008 requires an existing emission unit at a source 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 source is required to have a permit. LRAPA has determined that gaseous control devices for this type of facility are not typically used.

New Source Review (NSR)

16. Because the proposed PSELs for all regulated pollutants are below the Significant Emission Rates (SERs) in LRAPA Title 12, the facility is not subject to LRAPA's New Source Review (NSR) requirements for PM<sub>10</sub> nor the Prevention of Significant Deterioration (PSD) requirements for SO<sub>x</sub>, NO<sub>x</sub>, CO, and VOC.

New Source Performance Standards (NSPSs)

17. There are no emission units at the facility that are subject to any New Source Performance Standards.

Monitoring, Recordkeeping and Reporting

18. 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. The annual report is required to document compliance with the HAP and VOC limits contained in the permit.
19. 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

20. The draft permit was on public notice from October 27, 2011 to November 30, 2011. No written comments were submitted during the 35-day comment period.

MTL/cmw  
10/14/11