

Lane Regional Air Protection Agency  
**Simple Air Contaminant Discharge Permit – Simple ACDP**

**REVIEW REPORT**

**Atkore Plastic Pipe Company**  
**dba Ridgeline Pipe Manufacturing**  
<http://www.ridgelinepipe.com/>

**Permit No. 207488**

Permitting

**Permitting Action**

1. General Background Information

Atkore Plastic Pipe Company dba Ridgeline Pipe Manufacturing (the facility) manufactures plastic pipe out of imported dry PVC resin and other minor constituents at its facility in Eugene, Oregon. The facility produces approximately 70 million pounds per year of finished product. The operation consists of pneumatically conveying the resin from rail car to storage silos, weighing and mixing the resin with calcium carbonate and wax, extruding the plastic to specified size, and reclaiming any sub-standard product. The facility currently has six (6) extrusion lines. The air contaminant associated with the operation is particulate matter (PM) and particulate matter less than 10 microns in diameter (PM<sub>10</sub>) from product loss to atmosphere during material conveyance. The operating schedule for the facility is 8,760 hours/year (24 hours/day, 7 days/week, and 52 weeks/year).

2. Reasons for Permit Action

The facility operates a process listed in Table 1, Part B of LRAPA Title 37, and is therefore required to obtain a permit. The facility's ACDP expired on March 22, 2015. The primary reason for the permit issuance is to renew the expired permit. The permitted activity is being reclassified with the renewal from B.74 ("unlisted source of concern") to B.75 ("unlisted source which would have actual emissions, if the source were to operate uncontrolled, of 5 or more tons a year of PM<sub>10</sub>") in Table 1 of LRAPA Title 37 to more accurately reflect the facility activity. The fee category for the Simple ACDP is "low" because the facility has actual and future projected emissions that are less than 5 tons/year PM<sub>10</sub> in a PM<sub>10</sub> maintenance area.

3. Enforcement History

There have been no enforcement actions taken against the facility by LRAPA.

4. Performance Test Results

A test was performed on February 28, 2000 by Columbia River Carbonates (CRC) to determine the particle size distribution of the plastic shaving materials produced by the cutting process of PVC pipe and the affect these materials will have on emissions. The test results indicated that the smallest particles are approximately 10 microns in diameter. Since the vacuum system and baghouses will filter out particles greater than one (1) micron in diameter, the test estimated that 100% of the particles generated and collected will be removed.

5. Plant Site Emission Limits

In accordance with LRAPA 42-0043 and 42-0080, the PSELs for PM and PM<sub>10</sub> are set at the Generic PSEL level and established on a 12-month rolling basis.

Pollutant	Limit
PM	24
PM <sub>10</sub>	14
PM <sub>2.5</sub>	9

The attachment to this report contains estimations of emissions and details about the emission points.

The facility emits an estimated 229 lbs of VOC per year from ink jet printers for pipe marking (categorized as “ink” and “flush” for the period from 4/21/14 to 4/8/15). Because this level is well below the 1 ton/year VOC de minimis rate defined in LRAPA title 12, no VOC PSEL is required.

The emissions of particulate from the baghouses are estimated, based upon a potential to emit, to be less than the Generic PSEL level. No monitoring is required to ensure compliance with the PM/PM<sub>10</sub>/PM<sub>2.5</sub> PSELs other than keeping monthly records of material throughput (Imported dry PVC resin and calcium carbonate).

The facility’s estimated emissions are as follows:

Pollutant	Activity	Parameter	Emission Factor	Annual Emissions (pounds/year)
PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Resin and calcium carbonate throughput	70 million pounds/year	0.04 lb/ton	1,400
VOC	Inks and “flush”	28.7 gallons/year	7.96 lb/gal	229

The particulate emissions estimates are based upon a DEQ (AQ-EF02) emission factor of 0.04 lb/ton of throughput and is the same factor used for a baghouse controlling sanderdust. By way of examination of the facility’s particle size distribution and filter efficiencies, it was determined that the previously used emission estimation method of 0.03 gr/dscf, rated air flow (scf), and hours of operation were too conservative and didn’t reliably reflect actual emissions. The use of the 0.04 lb/ton emission factor is appropriate because the particle size distribution of PVC resin is much like mechanically generated sanderdust.

**Baseline Emission Rate**

The facility existed in the 1978 baseline year but has chosen to not retain the baseline by opting for a Simple ACDP.

6. Other Emission Limitations

LRAPA’s process weight rule specifies limits on the emissions of particulate matter for specific processes as a function of the amount of material processed [LRAPA 32-045(A)]. Using the cumulative maximum hourly design rate for the 30 baghouses of 131,000 pounds per hour, the title 32 table I limit corresponding to this process weight is approximately 47.1 lbs/hr. Since the

maximum hourly emissions have been estimated to be as much as 10.3 pounds per hour, compliance with the annual PSEL will ensure compliance with the process weight rule.

The permit includes general visible emissions limitations for the facility. The permit includes general grain loading limitations for the source.

7. Hazardous Air Pollutants

The projected HAP emissions from the facility are estimated to be negligible. The facility was formerly a source of Methyl Ethyl Ketone (MEK). However, the source of these emissions was the ink-jet printers and they have been removed from the facility. Likewise, MEK has been de-listed as a HAP. A SDS (Safety Data Sheet) for currently used ink is on file at LRAPA. The ink primarily contains cyclohexanone which is not a HAP. The facility is transitioning to a different ink that contains neither VOCs nor HAPs.

8. 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 source is required to have a permit. The emissions at this facility are subject to the grain loading standards in Title 32 and are therefore not required to meet TACT. However, the baghouse control devices would be considered TACT for this type of facility.

9. New Source Review and Prevention of Significant Deterioration

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<sub>10</sub> nor the Prevention of Significant Deterioration (PSD) requirements for SO<sub>x</sub>, NO<sub>x</sub>, CO, and VOC.

10. New Source Performance Standards

There are no sources at the facility that are subject to the new source performance standards.

11. Recordkeeping Requirements

The facility is required to keep a record of the following information for a period of five years.

Facility-Wide Activity	Parameter	Units	Minimum Recording Frequency
Imported Dry PVC resin	Material Usage	pounds	Monthly
Calcium Carbonate	Material Usage	pounds	Monthly
Wax	Material Usage	pounds	Monthly
Baghouse maintenance performed	Occurrence	NA	Occurrence

Reporting Requirements

12. **By February 15<sup>th</sup> each year**, the facility is required to submit the annual records of material usage and baghouse maintenance performed as well as any information as required per Condition G13.

Open Burning

13. Open burning is prohibited in accordance to the requirements of LRAPA 47-020.

Public Notice

14. The draft permit was on public notice from August 28, 2015 to October 1, 2015. No written comments were submitted during the 30-day comment period

Max/cmw  
10/02/15