

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

**REVIEW REPORT**

**Peterson Pacific Corp.**  
29408 & 29414 Airport Road  
Eugene, Oregon 97402

**Permit No. 206442**

1. **General Background Information**

Lane Regional Air Protection Agency (LRAPA) has reviewed the permit application received on May 8, 2015. The contents of the application was the basis for the contents within the review report. The current ACDP expires on June 28, 2015. This is a proposed permit for an existing facility.

Peterson Pacific Corp. operates a heavy equipment manufacturing facility. The operation is comprised of manufacturing heavy equipment used in the logging and wood recycling industries. The facility uses three (3) spray booths for painting, two burn tables and a plasma punch in manufacturing equipment. The facility was built in 1993.

2. **Emission Units Description**

Emission Unit	Description	Control	Date Installed
SB-A	Spray Booth (East)	Spray booth filter system	1995
SB-B	Spray Booth (Open)	Spray booth filter system	1999
SB-C	Spray Booth (West)	Spray booth filter system	1999
BT-A	Burn Table (Messer)	Baghouse	June 2008
BT-B	Burn Table (Kinetic)	Water Table	July 2007
BT-C	Plasma Punch (Whitney)	Baghouse	March 2007
CNC-A	CNC Machine (C.R. Onsrud)	Baghouse	October 2011

3. **Reasons for Permit Issuance and Fee Basis**

The facility operates a process listed in LRAPA Title 37, Table 1, Part B (B:69. Surface Coating Operations: coating operations whose actual or expected usage of coating materials is greater than 250 gallons per month, excluding sources that exclusively use non-VOC and non-HAP coatings and B:78. Metal Fabrication and Finishing Operations subject to an Area Source NESHAP) and is, therefore, required to have a Simple ACDP. The facility qualifies for the Simple "high" fee because actual emissions are more than 10 tons/year of VOC.

4. **Enforcement Actions**

Notice of Civil Penalty (NCP) No. 05-2816: On October 5, 2005 LRAPA issued a NCP No. 05-2816 in response to Notice of Non-Compliance (NON) No. 05-2816. A penalty in the amount of \$1,200.00 was imposed and paid for the violations of HAP synthetic minor limitations. Peterson

emitted 9.86 tons of methyl ethyl ketone (MEK) for the period of January 1, 2003 through December 31, 2003 against a permit limit of 9 tons.

Notice of Non-Compliance (NON) 05-2703: On June 22, 2004 LRAPA issued a Notice of Non-Compliance (NON) No. 05-2703 to Peterson Pacific for permit violations of Condition 3, monitoring for HAP limits, Condition 10, exceeding the plant site emission limits (PSEL), and Condition 12 and 13 regarding monitoring, recordkeeping and reporting. The PSEL exceedance was addressed in NON/NCP No. 05-2816.

5. **Plant Site Emission Limits (PSELs) Information**

Emissions for the facility are based on generic PSEL levels of 39 tons per year of VOC and 9 tons per year of any single HAP and 24 tons per year for combined HAPs according to LRAPA title 42-0040.

**Annual PSELs**  
(tons)

Source	VOC	Single HAP	Combined HAPs
Totals	39	9	24

6. **The Baseline Emission Rate (BER) and Significant Emission Rate (SER) Comparison**

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	NA	NA	NA	25
PM <sub>10</sub>	0	NA	NA	NA	NA	15
PM <sub>2.5</sub>	0	NA	NA	NA	NA	10
CO	0	NA	NA	NA	NA	100
NO <sub>x</sub>	0	NA	NA	NA	NA	40
SO <sub>2</sub>	0	NA	NA	NA	NA	40
VOC	0	39	39	0	0	40
Single HAP	0	9	9	0	0	10
Combined HAPs	0	24	24	0	0	25

- a. The Baseline Emission Rate has been set at zero (0) tons per year for all pollutants, because the facility was not in operation during the baseline period and because baseline emission rates are not included for any Simple ACDP source.

- b. For Simple ACDPs, the proposed PSELs are included at the Generic PSEL level for all pollutants emitted at more than the de minimis level as defined in LRAPA Title 12.
- c. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.

7. **Performance Standards and Emission Limits**

The particulate emissions from the facility point stacks are required to not equal or exceed 20% opacity as a six (6) minute block average. The permit contains the applicable particulate matter in terms of the grain loading standards. The DEQ adopted revised opacity and grain loading standards in April 2015 that apply to sources in Lane County.

8. **Hazardous Air Pollutants (HAPs)**

The HAP total for 2014 are 0.03 tons/year, where Xylene is the highest single HAP at 0.02 tons/year. A major source of HAP is 10 tons/year of any single HAP and 25 tons/year of a combination of HAP. Peterson Pacific is an "area source" of HAP and therefore, is applicable to 40 CFR 63, Subpart XXXXXX – National Emission Standards for Hazardous Air Pollutants Area Source for Nine Metal Fabrication and Finishing Source Categories, because it is under Standard Industrial Classification (SIC) Code 3531 which is applicable to Subpart XXXXXX.

Hazardous Air Pollutants	2009 Annual Emission Rate (tons/year)	2014 Annual Emission Rate (tons/year)
1,2,3 Trimethylbenzene	0.00	0.00
Ethyl Benzene	0.01	0.01
Formaldehyde	0.01	0.00
Glycol Ether	0.00	0.00
Methanol	0.00	0.00
Methyl Isobutyl Ketone	0.02	0.00
Phenol	0.01	0.00
Styrene	0.01	0.00
Toluene	0.01	0.00
Triethylamine	0.00	0.00
Xylene	0.07	0.02
Cobalt/Cobalt Compounds as Cobalt	0.00	0.00
<b>Total</b>	<b>0.14</b>	<b>0.03</b>

9. **New Source Performance Standards (NSPSs)**

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

10. **Typically Achievable Control Technology (TACT)**

LRAPA Title 32-008 requires a new emission unit at a facility to meet TACT if the emission unit has emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutants or five (5) tons per year of particulate, the emission unit is not subject to the 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 emission units at this facility are subject to the grain loading and visible emissions

emission standards in Title 32 and are, therefore, not required to meet TACT. However, the type of controls used by the facility are considered TACT by LRAPA.

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

This source is not subject to PSD for the affected criteria pollutants. The PSEs for the criteria pollutants are below the Significant Emission Rates (SERs) established in LRAPA Title 12. The facility is not subject to LRAPA's Prevention of Significant Deterioration (PSD) requirements for PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>x</sub>, NO<sub>x</sub>, CO, and VOC.

12. **Continuous Compliance**

Records of continuous compliance are required to be maintained for a period of at least five (5) years at the plant site. [LRAPA 35-0160 and 42-0080].

13. **Reporting**

- a. An annual summary to document compliance with the Plant Site Emission Limits is required to be submitted by **February 15<sup>th</sup>** each year. The summary will contain the VOC emission data as required per permit Condition 5 and the recordkeeping information in Condition 12.
- b. An annual summary to document compliance with the 40 CFR 63, Subpart XXXXXX ('6X' Metal Fabrication NESHAP) is required to be submitted by January 31<sup>st</sup> each year.
- c. The annual summary will also report any information as required per General Condition G15.

14. **Public Notice**

The draft permit was on public notice from October 15, 2015 to November 18, 2015. No written comments were submitted during the 30-day comment period.

BD/cmw  
11/18/2015