

Lane Regional Air Protection Agency
 Simple "Low" Air Contaminant Discharge Permit

REVIEW REPORT

Willamette Valley Sandblasting
 1250 Bertelsen Road
 Eugene, Oregon 97402

Permit No. 208932

Source Information:

SIC	1799 – Special trade contractor
NAICS	238990 - All other Specialty Trade Contractors

Source Categories (LRAPA Title 37, Table 1)	B. 74 All other sources not listed herein that LRAPA determines an air quality concern exists
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Special Conditions	n
Compliance schedule	n

Source test [date(s)]	n
COMS	n
CEMS	n
Ambient monitoring	n

Reporting Requirements:

Annual report (due date)	Feb 15
NSPS Report (due date)	n
Monthly report (due dates)	n

Excess emissions report	y
Other reports	n

Air Programs:

NSPS (list subparts)	n
NESHAP (list subparts)	n
CAM	n
Regional Haze (RH)	n
Synthetic Minor (SM)	n
Part 68 Risk Management	n
Title V	n
ACDP (SIP)	n
New Source Review (NSR)	n
Prevention of Significant Deterioration (PSD)	n
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n

Permitting Action

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on July 18, 2012 and was originally scheduled to expire on July 18, 2017. The existing permit remains valid until the proposed permit is issued because the facility submitted a timely and complete application for renewal. The facility was issued its first ACDP in 2002.

The facility indicated in their 2017 renewal application that no changes have been made to the permit since the last renewal.

Other Permits

2. No other permits have been issued or are required by LRAPA for this facility.

Attainment Status

3. The facility is located in a maintenance area for CO and PM₁₀. The area is in attainment for all other criteria pollutants.

General Background Information

4. Willamette Valley Sandblasting operates a sandblasting operation at 1250 South Bertelsen Road in Eugene and at various locations in Lane County. The facility controls PM (particulate matter)/PM₁₀ emissions by the use of enclosures and water spray.

Reasons for Permit Issuance

5. Lane Regional Air Protection Agency (LRAPA) has determined that the facility qualifies for the Simple "Low" fee category for the following reasons: Emissions from this facility are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the criteria gaseous pollutants.

Emission Unit Description

6. The facility controls particulate matter emissions inside using enclosures with fabric curtains and a water sprinkler system. Particulate matter emissions are controlled outside using a wet blasting system. Other specific emission sources include:

EU ID	Emission Unit (EU)	Control Device
EU-1	Sandblasting - Enclosed	Enclosures and water spray
EU-2	Sandblasting - Open	Water spray

Compliance History

7. The following enforcement actions have been taken against this facility:

On March 21, 1994 LRAPA issued NON 1025 to Willamette Valley Sandblasting for sandblasting without containment. NON 1025 was closed on April 04, 1994 with no further action.

On July 12, 1994 LRAPA issued NON 9443 to Willamette Valley Sandblasting for sandblasting without containment. NCP 94-43 (NON 9443) was issued on July 12, 1994 in the amount of \$1,900. There was a request to reduce the penalty amount on August 4, 1994. The full amount was received August 24, 1994.

On April 6, 1995 LRAPA issued NON 9507 to Willamette Valley Sandblasting for failure to minimize emissions while operating sandblasting equipment. NCP 95-07 (NON 9507) was issued on April 6, 1995 in the amount of \$1,200. The full amount was received April 27, 1995.

On September 12, 1995 LRAPA issued NON 1132 to Willamette Valley Sandblasting for sandblasting without containment. NCP 1995-21 (NON 1132) was issued on September 12, 1995. Resolved on June 17, 1996 along with NCP 1996-1198, see below.

On February 1, 1996 LRAPA issued NON 1198 to Willamette Valley Sandblasting for sandblasting without containment and no water spray system. NCP 1996-1198 (NON 1198) was issued on February 1, 1996. The facility paid \$1,500 on February 22, 1996 and both NCP 1995-21 and NCP 1996-1198 were closed June 17, 1996.

On April 2nd, 1996 LRAPA issued NON 1217 to Willamette Valley Sandblasting for failure to minimize emissions while operating sandblasting equipment. NCP 1996-1217 (NON 1217) was issued on April 2nd, 1996 in the amount of \$2,200. NCP 1996-1217 was withdrawn and dismissed on the condition that a facility containment and compliance assurance plan be agreed upon.

On June 21, 1999 LRAPA issued NON 1800 to Willamette Valley Sandblasting for failure to take reasonable precautions to prevent particulate matter from becoming airborne, and failure to use adequate containment (water) during sandblasting. NCP 99-1800 (NON 1800) was issued on June 21, 1999 in the amount of \$1,200. There was a request to reduce the penalty amount on August 4, 1994. The request was approved, and the amount was reduced to \$900. LRAPA further agreed to suspend \$300 of the remaining amount on the condition that Willamette Valley Sandblasting would operate in compliance with LRAPA regulations and would abide by the CAOP (Compliance Assurance Operating Procedures) submitted to LRAPA on November 29, 1999. The full amount of \$600 was received January 14, 2000.

On May 25, 2000 LRAPA issued NON 1914 to Willamette Valley Sandblasting for failure to take reasonable precautions to prevent particulate matter from becoming airborne; failure to use water in sandblast gun; failure to use water sprinkler off containment shed. The suspended civil penalty of NCP 99-1800 in the amount of \$300 became due and was paid July 20, 2000. Willamette Valley Sandblasting was also required to submit an application for an ACDP within 45 days of the receipt of the July 5, 2000 notice.

On June 07, 2011 LRAPA issued NON 3300 to Willamette Valley Sandblasting for failure to use reasonable precautions such as adequate containment during sandblasting to prevent particulate matter from becoming airborne. NON 3300 was closed on June 28, 2011 with no further action.

The facility was inspected on January 17, 2018 and found to be in compliance with permit conditions.

Plant Site Emission Limits (PSELS) Information

8.

Annual Plant Site Emission Limits (PSELS)
(tons per year)

Source	PM	PM ₁₀	PM _{2.5}
Sandblasting	24	14	9

- a. The proposed PSELS for all pollutants are equal to the Generic PSEL in accordance with LRAPA 37-0064(3)(b) and the netting basis is zero in accordance with 42-0040(2).
 - b. PSELS for CO, NO_x, SO₂, VOCs, and GHGs are not included in this permit since emissions of these pollutants are less than the respective de minimis emission rates.
 - c. The PSEL is a federally enforceable limit on the potential to emit.
 - d. Recordkeeping of the parameters listed in Condition 9 of the permit will be used to ensure compliance with the PSELS.
9. The pollutants of concern associated with this type of facility are PM and PM₁₀. Emissions of the above pollutants are estimated to be 4 tons per year. The attachment to this review report contains emissions estimates for the facility's applicable emission units.

Baseline Emission Rate (BER) and Significant Emission Rate (SER)

10. Baseline Emissions were not set in the permit because the facility is well below the Significant Emission Rates (SERs) as listed in Title 12 of LRAPA's Rules and Regulations and because the facility has chosen not to maintain the baseline emissions by way of the Simple ACDP permit type selection.

Hazardous Air Pollutants (HAPs)

11. A major source for hazardous air pollutants (HAP) is a facility that has the potential to emit 10 or more tons per year of any single HAP or 25 or more tons per year of combined HAPs. This source is not a major source of hazardous air pollutants.

The projected maximum potential HAP emissions from the facility, taken from the facility's Cleaner Air Oregon Emission Inventory (CAO EI), are shown in the following table:

Pollutant	Pounds/year	Tons/year
Lead	8.1	0.004
Nickel	6.3	0.003
Manganese	1.9	0.001
Cadmium	1.6	0.001
Total	18	0.9

NESHAPS/MACT Applicability

12. There are no sources at this facility for which National Emission Standards for Hazardous Air Pollutants (NESHAPs) have been promulgated. While it may be possible that the facility performs dry abrasive blasting on individual sources that would be classified as one of the nine categories in the Metal Fabrication NESHAP (Subpart 6X), LRAPA chose not to require or perform the extensive analysis required to make such a determination. Instead, LRAPA placed the pertinent sections into the permit from the Metal Fab NESHAP for 'Dry Abrasive Blasting' that would be considered Generally Available Control Technology (GACT).

NSPS Applicability

13. There are no sources at this facility for which New Source Performance Standards (NSPS) standards have been promulgated.

Monitoring and Record Keeping and Reporting

14. A record of the following data must be maintained for a period of five (5) years at the plant site and must be available for inspection by authorized representatives of LRAPA:

Activity	Parameter	Units	Recording Frequency
Sandblasting	Abrasive Media Usage by location (By EU-1 or EU-2)	Pounds	Monthly

15. The facility is required to perform visual determinations of fugitive emissions for abrasive blasting of objects greater than 8 feet (2.4 meters) in any one dimension that is performed outdoors.

16. The facility is required to submit an annual report by **February 15th** each year to include the information identified in items 14 above.

Special Conditions and Additional Limitations

17. The facility is required to notify LRAPA no less than 24 hours in advance of performing any contract abrasive blasting at locations other than 1250 South Bertelsen Road.

18. The facility is subject to the visible emissions standards in LRAPA 32-010(3), the particulate grain-loading standard in LRAPA 32-015(2)(b)(B), the highest and best requirement of LRAPA 32-005. Sandblasting within enclosures with the curtains drawn whenever possible, and the adequate use of water, should assure compliance with the grain-loading and visible emissions limits.

Public Notice

19. The draft permit was on public notice from January 9, 2019 to February 7, 2019. No written comments were submitted during the 30-day comment period

Willamette Valley Sandblasting Emission Details:

Sandblasting Booth Emissions					
Process	Pollutant	Projected Maximum Usage (lb abrasive/yr)	Emission Factor (lbs PM/lb abrasive)	Conversion Factor (tons/lb)	Projected Annual Emissions (tons)
Sandblasting in shed with fabric covering	PM/PM ₁₀ /PM _{2.5}	288,000	0.00069	0.0005	0.10
Sandblasting without controls in 5-mph wind	PM/PM ₁₀ /PM _{2.5}	288,000	0.027	0.0005	3.89
Total					3.99

Maximum design capacity is the sum of all the sandblasting operations.
 Particulate Matter Emission Factors were obtained from AP-42 table 13.2.6-1
 Projected Annual Emissions = Projected Maximum Usage x Emission Factor x Conversion Factor.