

Lane Regional Air Protection Agency
 Simple Air Contaminant Discharge Permit

REVIEW REPORT

Newood Display Fixture Mfg., Company

Permit No. 205808

10 North Seneca Road
 Eugene, Oregon 97402
<http://newood.com/>

Source Information:

SIC - Primary	2541
SIC - Secondary	NA
NAICS - Primary	337215
NAICS - Secondary	NA
Source Categories (LRAPA Title 37, Table 1)	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 containing coatings.
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Compliance schedule	n
Source test date	n

COMS	n
CEMS	n
Ambient monitoring	n

Reporting Requirements:

Annual reports (due dates)	February 15th
Semi-annual reports (due dates)	n
SACC (due date)	n

Quarterly report (due dates)	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	n

Deterioration (PSD)	
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n

General Background Information

1. Lane Regional Air Protection Agency (LRAPA) has reviewed the permit application received on February 8, 2017. The contents of the application and subsequent correspondence with the facility were the basis for the calculations contained within this review report.
2. Newood Display Fixture Mfg., Company operates a wood office and store fixture production facility (SIC Code 2541) in Eugene. The facility uses four (4) spray paint booths, one electric-powered IR coating oven, and a dust collection system consisting of one (1) baghouse, and one (1) cyclone with baghouse to control emissions from various woodworking tools that are used to produce display fixtures. An electric-powered wood chipper is also located at the facility. A natural gas-fired air makeup furnace rated at 4.9 MMBtu/hr is also used to facilitate drying of coated products particularly during cold weather. The facility operates 2,080 hours per year (8 hours/day, 5 days/week, and 52 weeks per year).

Emission Point Identification

3. The facility's emission units (EU) are:

Emission Unit	EU ID
Woodworking Activities with Two (2) Dust Collection Systems – one with cyclone, each controlled by controlled by a baghouse	BH-1, BH-2
Spray Booths (4)	PB-1, PB-2, PB-3, PB-4
Painting Area Fugitives	EU-6
Chipper (electric-powered)	EU-Chipper
Air Makeup Furnace – natural gas-fired (4.9 MMBtu/hour)	EU-Furnace

Reasons for Permit Issuance

4. This action is a renewal of Air Contaminant Discharge Permit (ACDP) 204412 which was originally issued June 26, 1995, renewed in 2001, 2006, 2012, and expired on August 17, 2017. 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 containing coatings) and is therefore required to obtain an ACDP. The primary reason for this permit action is to renew the expired permit. 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 12. The maximum estimated annual emissions of VOC since the last permit renewal was 6.2 tons per year in 2014 which is 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. Safety Data Sheets (SDS), Certified Product Data Sheet (CPDS), and material usage are used to determine the facility's VOC and HAP emissions.

Hazardous Air Pollutants (HAPs)

8. The maximum estimated annual emission of HAPs was 0.41 tons per year of total HAPs (in 2017). Recent HAP emissions are significantly lower due to changes in coatings. 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 including the Paint Stripping and Miscellaneous Surface Coating Operations (Subpart HHHHHH or 6H) because the facility does not spray apply coatings to metal or plastic substrates - only wood substances. Synthetic minor conditions were removed because the facility has made changes to lower VOC and HAP coatings which result in emissions are well below the HAP limits which were the driver of the original limitations. However, the permit maintains the HAP emissions estimation requirements to allow LRAPA to continue reviewing HAP emissions at the facility.

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), 9 tons per year for any single HAP and 24 tons per year for total HAPs. The attachment to this Review Report contains the calculations and further explanation of the emissions estimates. PSELs were reevaluated for CO and NO_x and were removed because actual emissions from the furnaces are less than the 1.0 ton/year de minimis level. The permit requires monthly recordkeeping and annual reporting of natural gas combustion to ensure the emissions from gas combustion remain below the de minimis levels.

Baseline Emission Rate (BER)

10. The BER has been set at zero (0) tons per year for all pollutants since the facility was not in operation during the 1978 baseline year.

Significant Emission Rate (SER)

11. The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 12, for VOC 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	NA	NA	0	0	25
PM ₁₀	0	NA	NA	0	0	15
PM _{2.5}	NA	NA	NA	0	0	10
CO	0	NA	NA	0	0	100
NO _x	0	NA	NA	0	0	40
VOC	0	39	39	0	39	40
SO _x	0	NA	0	0	0	40
GHG	0	NA	NA	0	0	75,000

Performance Standards and Limitations

12. The facility has emission units and activities subject to the visible emissions standards in LRAPA 32-010, the particulate grain-loading standard in LRAPA 32-015, and the highest and best requirement of LRAPA 32-005. Operation of well-maintained paint booth filters should assure compliance with the grain loading and visible emissions limits. The facility is also required to conduct inspections and maintenance of the equipment to assure compliance with the highest and best requirement.
13. The facility is subject to the PSEL rules in LRAPA 42-0040 and 42-0060. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC and HAPs are below the limits.

Monitoring, Recordkeeping and Reporting

14. The facility is required to record all inspections and maintenance of air pollution control equipment including the paint booth filters and baghouse maintenance. 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.
15. Monitoring for PSEL compliance for NO_x and CO is not necessary because maximum emissions from the air make-up furnaces are not capable of emitting over the de minimis level. However, the permit requires monthly recordkeeping and annual reporting of natural gas combustion to ensure the emissions from gas combustion remain below the de minimis levels.
16. Additionally, PM, PM₁₀, and PM_{2.5} PSEL monitoring is not required due the low level of particulate emissions (below the de minimis) from woodworking with baghouse control. Particulate emissions are minimized through regular inspection and maintenance of the baghouse.
17. As part of the previous permit renewal requirements for semiannual compliance reports were removed because the facility was and is currently operating below half of the major source threshold for HAPs. The annual report is due on February 15th.
18. Additionally, 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

19. The draft permit was on public notice from April 18, 2018 to May 18, 2018. No written comments were submitted during the 30-day comment period

Max/cmw
05/21/18

Emission Details

Newood Display Fixture					
Permit No. 205808					
Surface Coating Operations					
	Throughput	Throughput	Emissions		
Pollutant	(gal/year)	(lbs/year)	(ton/yr)		
VOC	1,904	15,287	1.3		
HAPs	1,904	15,287	0.16		
Wood-working operations					
	Throughput	Emission Factor	Emissions		
Pollutant	(BDT/year)	(lbs/BDT)	(ton/yr)		
PM	116.82	0.04	0.002		
Emission estimates and/or throughputs from the facility's 2011 annual report					
PM emission factor from ODEQ AQ-EF02 for cyclone w/ baghouse					
Natural Gas Combustion (4.9 MM Btu/hr furnace)					
	Max Design	Actual Usage 2017	Emission Factor	Actual 2017	Max
Pollutant	(MMscf/hr)	(MMscf/yr)	(lbs/MMscf)	Emissions	Emissions
PM	0.0048	1.6	7.6	0.01	0.2
NOx	0.0048	1.6	94	0.08	2.0
CO	0.0048	1.6	40	0.03	0.8
VOC	0.0048	1.6	5.5	0.00	0.1
Emission factors from AP42 1.4-4 for residential furnaces					
Actual gas usage in 2017 was 16,078 therms or 1.6 MMscf					
Electric-powered chipper emissions of PM are expected to be minimal.					