

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

**REVIEW REPORT**

**Armur Electrostatic Powder Coatings & Sandblasting**  
 6191 Royal Avenue  
 Eugene, Oregon 97402

**Permit No. 200037**

**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 January 4, 2012 and was originally scheduled to expire on January 4, 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 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 PM<sub>10</sub>. The area is in attainment for all other criteria pollutants.

General Background Information

4. The facility operates a sandblasting operation at 6191 Royal Avenue in Eugene and at various locations in Lane County.

In September 2011, Sandblasting room C (SBR-C) with an attached cyclone, was installed.

There was a fire in January 2018 that destroyed the powder coating area and most of the electrical power lines. One powder coating oven survived (EP-3), but as a result of the damage, this facility is currently performing limited powder coating and sandblasting. They temporarily moved the powder coating oven while they rebuild the powder coating booth.

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 by the use of enclosures, and an integrated cyclone on Emission Unit SBR-C. Other specific emission sources include:

EU ID	Emission Unit (EU)	Control Device
SBR-A	Sandblasting Booth	NA
SBR-B	Sandblasting Booth	NA
SBR-C	Sandblasting Booth	Cyclone
EP-1	Powder Coating Booth	NA

EU ID	Emission Unit (EU)	Control Device
EP-3	Powder Coating Oven	NA

Compliance History

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

Notice of Non-Compliance (NON) 1049: On July 15<sup>th</sup>, 1994 LRAPA issued NON 1049 to Armur Electrostatic Powder Coatings & Sandblasting for sandblasting without containment. NON 1049 was closed on November 01, 1994 with no further action.

Notice of Non-Compliance (NON) 2585: On May 12<sup>th</sup>, 2004 LRAPA issued NON 2585 to Armur Electrostatic Powder Coatings & Sandblasting for violations of LRAPA Title 48 Section 48-015-2-E, Adequate containment during sandblasting or other similar operations. NON 2585 was resolved through the installation of appropriate controls.

Notice of Non-Compliance (NON) 3532: On February 17<sup>th</sup>, 2014 LRAPA issued NON 3532 to Armur Electrostatic Powder Coatings & Sandblasting for failure to submit an annual summary of information report per condition 12 of the ACDP 200037 issued on January 4, 2012. NON 3532 was resolved when they submitted the annual summary of information on October 15, 2014.

Plant Site Emission Limits (PSELs) Information

- 8.

**Annual Plant Site Emission Limits (PSELs)**  
 (tons per year)

Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>
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<sub>x</sub>, SO<sub>2</sub> 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 10 and 11 of the permit will be used to ensure compliance with the PSELs.
9. The pollutants of concern associated with this type of facility are particulate matter (PM). Emissions of the above pollutants are estimated to be 4.97 tons per year. The permit includes a limit of 100,000 lbs of sandblasting media per year to ensure the facility continues to qualify for the Simple "Low" fee designation. The attachment to this review report contains emissions estimates for the facilities particulate matter.

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.

NESHAPS/MACT Applicability

11. There are no sources at this facility for which NESHAPS/MACT, (National Emissions Standards for Hazardous Air Pollutants / Maximum Achievable Control Technology), standards have been promulgated.

The facility is not subject to the Nine Metal Fabrication and Finishing Area Source Categories, (40 CFR Part 63 Subpart XXXXXX (6X)), because it is not primarily engaged in an activity identified in the list of Standard Industrial Classification (SIC) codes defined in 6X.

The facility is not subject to Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources, (40 CFR Part 63 Subpart HHHHHH (6H)), because they are only engaged in powder coating and do not use spray applied coatings as defined in 6H.

NSPS Applicability

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

Record Keeping and Reporting

13. A record of the following data must be maintained for a period of at least **five (5) years** at the plant site and must be available for inspection by authorized representatives of LRAPA: [LRAPA 34-016(5)]

Activity	Parameter	Units	Recording Frequency
Sandblasting	Abrasive media Usage	Pounds	Monthly
Powder Coating	Coating Media Usage	Pounds	Monthly
Oven	Propane Usage	Gallons	Monthly

14. The facility is required to submit an annual report by **February 15<sup>th</sup>** each year to include the information identified in Item 13 above and Conditions 10 and 11 of the Permit.

Additional Limitations

15. 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 the booths, with the doors or curtains closed, and the operation of a well-maintained cyclone, should assure compliance with the grain loading and visible emission limits.

Public Notice

16. The draft permit will be on public notice from March 14, 2019 to April 12, 2019. Written comments may be submitted during the 30-day comment period. If requested by ten (10) or more individuals or an individual representing a group of more than ten (10) individuals, there will be a public hearing following the comment period.

After the comment period and hearing (if requested), LRAPA will respond to comments received and then take final action to issue or deny the permit within 45 days of the close of the public comment or hearing period.

Cnc/cmw  
3/11/19

**Armur Emission Details:**

<b>Sandblasting Booth Emissions</b>				
Pollutant	Projected Maximum Usage (lb abrasive/yr)	Emission Factor (lbs PM/lb abrasive)	Conversion Factor (tons/lb)	Projected Annual Emissions (tons)
PM <sub>10</sub> /PM <sub>2.5</sub>	100,000	0.091	0.0005	4.55

Maximum design capacity is the sum of all the sandblasting booth capacities.  
 The projected maximum abrasive usage is based on the limit set in the permit conditions.  
 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.

<b>EP-1 Powder Coat - Spray Booth Emissions</b>				
Pollutant	Projected Maximum Usage (lb coating/yr)	Emission Factor (lb PM/lb Coating)	Conversion Factor (tons/lb)	Projected Annual Emissions (Tons)
PM <sub>10</sub> /PM <sub>2.5</sub>	1,618	0.5	0.0005	0.405

Coating used is Neat Koat Pure Polyester Powder Coating  
 The projected maximum coating usage is 1618 lb/year, based on the maximum usage reported (2014)  
 Particulate Matter Emission Factor was obtained from AP-42 Ch. 4.2.2.12  
 Projected Annual Emissions = Projected Maximum Usage x Emission Factor x Conversion Factor

<b>EP-3 Propane Combustion - Large Curing Oven</b>				
Pollutant	Projected Max. Propane Usage (gal/yr)	Emission Factor (lb/1000 gal propane)	Conversion Factor (tons/lb)	Projected Annual Emissions (Tons)
PM <sub>10</sub> /PM <sub>2.5</sub>	53,757	0.7	0.0005	0.019
NO <sub>x</sub>	53,757	13	0.0005	0.349
CO	53,757	7.5	0.0005	0.202

The projected maximum propane usage is 53,757 gallons/year, based on the maximum usage reported (2013)  
 Projected Annual Emissions = Projected Max. Propane Usage/1000 x Emission Factor x Conversion Factor  
 Gaseous Emission Factors were obtained from AP-42 table 1.5-2

<b>Total Site Emissions</b>	
Pollutant	Projected Annual Emissions (Tons)
PM <sub>10</sub> /PM <sub>2.5</sub>	4.97
NO <sub>x</sub>	0.35
CO	0.20