Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit
REVIEW REPORT

Waterdog Surface Technologies
90554 Highway 99 North
Eugene, Oregon 97402
https://bowtecharchery.com/about/

Permit No. 208944

Source Information:

SIC	3949 – Sporting and Athletic Goods
NAICS	339920 – Sporting and Athletic Goods

Source Categories (LRAPA Title 37, Table 1)	B. 69 – Surface coating operations > 250 gallons per year
Public Notice Category	Category II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Special Conditions	y
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
SM-80	n
Part 68 Risk Management	n
Title V	n
ACDP (SIP)	n
Major HAP source	n
Federal major source	n
New Source Review (NSR)	n
Prevention of Significant Deterioration (PSD)	n
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n
>20 Megawatts	n

Permittee Identification

1. Waterdog Surface Technologies ("the facility") manufactures archery equipment at 90554 Highway 99 North in Eugene, Oregon. The facility is owned by Bowtech Inc.

General Background Information

2. Existing air contaminant sources at the facility consist of VOC/HAPs emissions. The facility is comprised of surface coating of bows, where there is one (1) basecoat spray booth, two (2) topcoat spray booths, and two (2) stand-alone spray booths for a total of five (5) spray booths. The latter two (2) stand-alone spray booths were installed during the previous permit term and are used on an infrequent basis.

Reasons for Permit Action

3. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which was issued on March 13, 2015 and was scheduled to expire on March 13, 2020. The facility indicated in their 2019 renewal application that no changes have been made to the permit since the last renewal. Because the actual emissions from calendar year 2019 were greater than 10 tons/year for VOCs, the permit action is considered a Simple "high" ACDP renewal under LRAPA 37-0064(2)(b).

Attainment Status

4. This facility is located in an attainment area for all pollutants. The Eugene-Springfield area is designated as an attainment area with a maintenance plan for both PM_{10} and CO.

Compliance

5. The facility was inspected in 2016 and 2017 and found to be in compliance with permit conditions.

6. The facility was issued Notice of Non-Compliance (NON) No. 3016 on November 28, 2008, for failure to submit a construction notice prior to constructing or modifying an air contaminant source and operating an air contaminant source without first obtaining an ACDP.

   Notice of Violation (NOV) and Notice of Civil Penalty (NCP) No. 09-3016 was issued to the facility on February 2, 2009. The NCP included a total civil penalty and economic benefit amount of $12,813. LRAPA and the facility agreed to settle the violation for the amount equivalent to the total economic benefit for constructing and operating an air contaminant source without the required permits ($8,913). On August 18, 2009 the facility paid the amount of $8,913 and the violation was closed.

7. The facility was in non-compliance with the conditions of the permit on November 22, 2011. On March 7, 2012 the facility supplied some of the information required by the permit condition, but it was incomplete. A NON No. 3369 was issued on April 19, 2012.

   On July 3, 2012 the facility was issued a NOV No. 3369 for not complying with the conditions of the permit or supplying LRAPA with an Inspection and Maintenance (I&M) Plan.

   LRAPA issued a Stipulated Final Order (SFO) No. 12-3369 on August 14, 2012 to the facility with a penalty of $4,800 which was reduced to $2,100. The facility paid the penalty on August 14, 2012 and the violation was closed.

Emissions

8. Emissions for the facility is based on generic PSEL levels of 39 tons per year of VOC, 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 per year)

Pollutant	Plant Site Emission Limit (tons/year)
VOC	39
Individual HAP	9
Aggregate HAPs	24

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

9. The BER has been set at zero (0) tons per year for all pollutants since this source was not in operations during the 1978 baseline year and because it has not obtained a Standard ACDP. Additionally, the BER for GHG was not established because the facility did not utilize any fuel burning sources during the GHG baseline period (2000-2010).

Hazardous air pollutants/Toxic Air Contaminants

10. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and is therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants.

    LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in rule. All 187 hazardous air pollutants are on the list of approximately 600 toxic air contaminants. The hazardous air pollutants and toxic air contaminants listed below were reported by the source in 2016 and verified by LRAPA. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.

11. This source is not a major source of hazardous air pollutants (HAPs). The HAP emissions detail is provided at the end of this report. Provided below is a summary of the HAP and toxic air contaminant (TAC) actual emission estimates from the 2016 calendar year. The combined total for all federal HAPs in 2019 was 1.2 tons/year.

Pollutant Name	Sum Of Actual Source Emissions (lbs/yr)
t-Butyl acetate	713

Pollutant Name	Sum Of Actual Source Emissions (lbs/yr)
Ethyl benzene	56
Ethylene glycol monobutyl ether	424
Propylene glycol monomethyl ether	49
Propylene glycol monomethyl ether acetate	5,118
Methyl ethyl ketone	3,250
Methyl isobutyl ketone	0.0
Naphthalene	18
Toluene	1,478
1,2,4-Trimethylbenzene	13.3
Xylenes	141
TOTAL	11,260

Toxics Release Inventory

12. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which LRAPA has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:
    - Cancer or other chronic human health effects;
    - Significant adverse acute human health effects; or
    - Significant adverse environmental effects.

    There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.

    This facility did not report to the TRI.

Emission Limits

13. The paint booths (EU-PB) are subject to the visible emission limitations under LRAPA 32-010(3). This emission unit may not have visible emissions equal to or greater than 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour.

14. EU-PB is subject to particulate matter emission limitations under LRAPA 32-015(2)(b). For sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot.

15. EU-PB is subject to the process weight rate emission limitation under LRAPA 32-045. Particulate matter emissions in any one hour may not exceed the amount shown in LRAPA 32-8010 for the process weight allocated to the process.

16. Under LRAPA 32-007, the facility must prepare an Inspection and Maintenance Plan (I&M Plan) for the paint booth. The permittee must submit a copy of the I&M Plan to LRAPA for review upon request. If LRAPA determines the I&M Plan is deficient, LRAPA may require the permittee to amend the plan. At minimum, the I&M Plan must include inspection schedules for the paint booth and the associated dry filters used to control overspray. The I&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary.

Typically Achievable Control Technology (TACT)

17. LRAPA 32-008 requires a new or modified emission unit at a facility to meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR or a Type A State NSR under Title 38, an NSPS under Title 46, or any other standard applicable only to modified sources in Title 32, Title 33 or Title 39 for the regulated pollutant emitted; the facility is required to have a permit; the new emission unit would have emissions of any criteria pollutant equal to or greater than 1 ton per year; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT. The paint booths have VOC emissions greater than 1 ton per year. While LRAPA has not performed a formal TACT determination for VOCs, LRAPA has determined that (1) the use of high velocity, low pressure (HVLP) spray guns (or similar), (2) the use of dry filters with a control efficiency of at least 99.3% for particulate matter as determined by the manufacturer, (3) manual spray gun system cleaning is not performed outside a container that collects the gun cleaning solvent, and (4) personnel who apply surface coatings are trained in proper spray application of surface coatings, likely meets TACT. Based on vendor literature, HVLP spray guns typically achieve a transfer efficiency of 60% or greater. The facility's use of HVLP spray guns (or similar) results in the application of the least amount of VOC per square foot of product produced for their particular application.

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

18. The facility is not a federal major source because it is not a listed source and the proposed PSELs for all regulated pollutants are below the applicable federal major source threshold of 250 TPY. 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. Recent actual (from 2019 calendar year) VOC emissions are 22 tons/year.

New Source Performance Standards (NSPS)

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

National Emission Standards for Hazardous Air Pollutants (NESHAP)

20. The facility currently has PSELs for federal HAPs that limit emissions to no more than 9 tons per year for an individual federal HAP and 24 tons per year for the aggregate of all federal HAP and is a minor or area source of federal HAPs.

21. 40 CFR Part 63, Subpart MMMM National Emission Standards for Hazardous Air Pollutants for Surface Coating of miscellaneous Metal Parts and Products is not applicable to the facility because the facility is not a major source of HAPs.

22. 40 CFR Part 63, Subpart PPPP National Emission Standards for Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products is not applicable to the facility because the facility is not a major source of HAPs.

23. 40 CFR Part 63, Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources is not applicable to the facility because the facility does not use methylene chloride for paint stripping, it is not an autobody refinishing operation, and no target HAPs are reported as being used.

24. 40 CFR Part 63, Subpart XXXXXX National Emission Standards for Hazardous Air Pollutants: Nine Metal Fabrication and Finishing Source Categories is not applicable to the source because the facility does not engage in the operations stated in 40 CFR 63.11514(a).

Recordkeeping

25. The facility is required to keep and maintain a record of the following information for a period of five (5) years:

Activity	Parameter	Units	Minimum Recording Frequency
VOC/HAP-containing Material Usage	Material Usage	Gallons or Pounds	Monthly
VOC/HAP-containing Material Usage	Density of Material	Pounds per Gallon	Maintain current information at all times
VOC- containing Material Usage	VOC content	% By Weight	Maintain current information at all times
HAP- containing Material Usage	Individual HAP content	% By Weight	Maintain current information at all times
Paint Booth Filter Particulate Matter Control Efficiency	Control Efficiency	% Efficiency	Maintain documentation from each manufacturer
Paint Booth Training	Training Logs / Certifications	NA	Maintain documentation of training for spray coating personnel
Paint Booth Inspections	Occurrence	NA	Each inspection
Paint Booth Filter Replacement	Occurrence	NA	Upon Replacement
Inspection and Maintenance (I&M) Plan Activities and Parameters	Document	NA	As Specified in the I&M Plan

a. VOC/HAP-containing materials include, but are not limited to, coatings, lacquers, thinners, stains, topcoats, solvents, adhesives, cleaning, and wash-off materials.

b. The density and VOC/HAP content information must be supplied from CPDS or SDS provided by the manufacturer/supplier of the VOC/HAP containing material.

Reporting Requirements

26. The facility is required to submit an annual report by **February 15th** each year to include the VOC and HAP emission estimation information identified in Conditions 5 and 6 of the permit.

Public Notice

27. The draft permit will be public notice from November 18, 2020 to December 17, 2020. 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.

Max/cmw
11/10/2020

VOC and HAP Emissions for Dec 2019 with Rolling 12-month Totals:

Month	SKU #	Description	Qty Purchased (gal)	Density (lb/gal)	Exempt (lb/gal)	Solids (lb/gal)	Emission Factor	VOC (lb/gal)	VOC Ext. (lb)	HAPS (lb/gal)	HAPS Ext. (lb)
DEC	3744S0.100	White Toner	0.00	16.60	0.00	13.84	1	2.76	0.00	0.00	0.00
DEC	3744S0.202	Yellow Oxide Toner	1.50	13.80	0.00	9.42	1	4.38	6.57	0.00	0.00
DEC	3744S0.207	Medium Yellow Toner	0.25	9.60	0.00	5.90	1	3.70	0.93	0.00	0.00
DEC	3744S0.216	Organic Yellow Toner	0.00	9.10	0.00	5.06	1	4.04	0.00	0.00	0.00
DEC	3744S0.302	Red Oxide Toner	0.00	16.80	0.00	12.60	1	4.20	0.00	0.00	0.00
DEC	3744S0.317	Red Toner	0.00	8.30	0.00	3.88	1	4.42	0.00	0.00	0.00
DEC	3744S0.319	Violet Toner	0.00	8.40	0.00	3.83	1	4.57	0.00	0.00	0.00
DEC	3744S0.412	Green Toner	0.00	9.10	0.00	4.72	1	4.38	0.00	0.00	0.00
DEC	3744S0.509	Blue Toner	0.00	8.60	0.00	4.45	1	4.15	0.00	0.00	0.00
DEC	3744S0.606	Orange Toner	0.00	8.60	0.00	4.29	1	4.31	0.00	0.00	0.00
DEC	3744S0.704	Burnt Umber Toner	0.00	12.60	0.00	8.83	1	3.77	0.00	0.00	0.00
DEC	3744S0.900	Lamp Black Toner	1.50	9.00	0.00	4.02	1	4.98	7.47	0.00	0.00
DEC	4442SP.000	Neutral Vinyl Basecoat	31.00	10.15	0.43	4.66	1	5.06	156.86	0.63	19.53
DEC	4442SP.100	White Vinyl Basecoat	71.00	9.73	0.54	4.12	1	5.07	359.97	0.77	54.67
DEC	4442SP.114	New Breakup Country Vinyl Basecoat	0.00	9.14	0.51	3.03	1	5.61	0.00	0.42	0.00
DEC	4442SP.907	Black Vinyl Basecoat	55.00	9.78	0.44	4.13	1	5.21	286.55	0.56	30.80
DEC	8831S0.001	5% Gloss 2K SB Urethane TC DR	144.00	7.74	0.00	1.49	1	6.25	900.14	0.00	0.00
DEC	8831S0.003	Polyvinyl Clear 2K Zero Gloss	0.00	7.77	0.00	2.02	1	5.75	0.00	0.61	0.00
DEC	8831S1.002	15S Urethane TC DR	0.00	7.77	0.00	1.54		6.23	0.00	0.00	0.00
DEC	8831S8.001	2K SB TC DR Gloss	5.00	8.09	0.00	1.97	1	5.88	29.40	0.00	0.00
DEC	8845S0.001	3.5 VOC 2K Acrylic Clearcoat Flat	55.00	7.91	2.91	2.83	1	2.17	119.35	0.00	0.00
DEC	9901SS.009	Adhesion Promoter Primer	5.00	6.97	2.17	0.07	1	4.73	23.65	3.19	15.95
DEC	ADV-09905	LACQUER THINNER	10.00	6.74	1.67	0.00	1	5.07	50.71		0.00
DEC	AKZ-391059	SIK HIGH PERFORM REDUC FAST NA 1GL	0.00	7.29	0.00	1.24	1	6.05	0.00	2.70	0.00
DEC	AKZ-391062	SIK HIGH PERFORM REDUC MED NA 1GL	3.00	7.30	0.00	2.19	1	5.11	15.33	0.41	1.23
DEC	AKZ-391066	SIK HIGH PERFORM REDUC XTR SLOW NA 1GL	28.00	7.36	0.00	2.24	1	5.12	143.36	1.81	50.68
DEC	AKZ-ABP-MIX	SIK ABP MIXED COLOR	11.00	7.95	0.00	2.15	1	5.80	63.80	0.00	0.00
DEC	HDR002.000	Isocyanate Hardener	35.00	8.37	0.00	4.19	1	4.18	146.30	0.01	0.35
DEC	HDR004.000	Automotive Hardener	10.00	8.39	1.88	4.56	1	1.95	19.50	0.01	0.10
DEC	RED000.004	Butyl Acetate	110.00	7.35	0.00	0.00	1	7.35	808.50	0.00	0.00
DEC	RED000.022	PM Acetate	0.00	8.06	0.00	0.00	1	8.06	0.00	0.00	0.00
DEC	UTC-391077	UTE E350 EP PRIME BLACK NA 1GL	0.00	13.61	0.00	10.87	1	2.74	0.00	0.13	0.00
DEC	UTC-391078	UTE E350 EP HARD NA 1GL	0.00	7.67	0.00	2.47	1	5.20	0.00	0.24	0.00
DEC	UTC-483635	UTE U726 VIOLET RED TINT	0.00	8.80	0.00	5.68	1	3.12	0.00	0.01	0.00
DEC	UTC-483646	UTE U564 BLUE SHADE GREEN TINT	0.00	8.80	0.00	8.80			0.00		0.00
DEC	UTC-483647	UTE U652 GREEN SHADE BLUE TINT	0.00	8.80	0.00	8.80			0.00		0.00
DEC	UTC-483650	UTE U766 BLUE SHADE VIOLET TINT	0.00	8.57	0.00	5.43	1	3.14	0.00	0.02	0.00
		Rolling 12 VOC (lb)	**44,754.8**					**Total VOC (lb)**	**3,138.4**	**Total HAPS (lb)**	**173.3**
		Rolling 12 VOC (ton)	**22.4**					**Total VOC (ton)**	**1.6**	**Total HAPS (ton)**	**0.1**
		Rolling 12 HAPS (lb)	**2,478.0**								
		Rolling 12 HAPS (Ton)	**1.2**								