

Lane Regional Air Protection Agency
Minimal Source Air Contaminant Discharge Permit

REVIEW REPORT

Columbia Industrial Products

Permit No: 201288

PERMITTING

Permitting Action

1. The permit is a renewed Air Contaminant Discharge Permit (ACDP) for a minimal source of VOC.

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 an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/ Springfield Air Quality Management Area is a non-attainment area for PM₁₀.

SOURCE DESCRIPTION

Overview

4. The facility is a composite plastic parts manufacturing operation at 29538 Airport Road, Unit A, in Eugene. The facility has no control equipment for PM (particulate matter)/PM₁₀ emissions or VOC emissions. Proposed total annual usage of VOC-containing materials (primarily resins) of approximately 275,000 pounds was further limited by Permit Condition 4 to 151,515 pounds. This ACDP is a renewed permit for an existing facility. The facility operates 4160 hours per year (16 hours per day, 5 days per week, 52 weeks per year).

Process and Control Devices

5. Proposed air contaminant sources at the facility consist of the following:
 - 5.a. 1 Resin Storage Tank
 - 5.b. 1 Electrically-heated curing oven
 - 5.c. 1 Product press
 - 5.d. 2 mat-resin immersion baths
 - 5.e. Finishing equipment including:
 - 5.e.i. Lathe
 - 5.e.ii. Saws
 - 5.e.iii. Sanding

EMISSIONS

6. The pollutant(s) of concern associated with this facility type are PM, PM₁₀, and VOC. Emissions of PM are estimated to be negligible due to the location of the activities (inside a building) and to the limited quantity of PM/PM₁₀ expected from sawing and sanding of the fiberglass plates produced here. VOC emissions result primarily from the use of styrene-containing resins. Styrene is a VOC and a HAP. The other criteria pollutants are emitted at negligible levels. Emission calculation details are as follows:

Device/Process	Pollutant	Annual Throughput	Emission Factor* (lb VOC/ton Resin)	Emissions lb/yr
Tank, Baths, press, and Oven	VOC	151,515 lb resin	132	10,000
VOC TOTAL				5 tons/yr

Device/Process	Pollutant	Annual Throughput	Emission Factor* (lb VOC/ton Resin)	Emissions lb/yr
Saws, Lathe, Sanding	PM	NA	Neg	Neg
PM TOTAL				Neg

Assumptions:

-Resin styrene content of 33%

-20% of styrene is emitted (the applicant submitted a less conservative estimate which requires verification prior to exceeding the above resin throughput)

* Emission factor is from CFA (Composites Fabricators Association)

MINIMAL PERMIT DETERMINATION

7. The Agency has determined that the facility qualifies as a minimal source for the following reasons:
 - 7.a. At an annual resin consumption rate of 151,515 pounds, emissions from this source 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. Also, the HAPs potential to emit is expected to be below the threshold of 50% of a major HAP source threshold. Should the facility determine that it must be redesignated as a regular or synthetic minor source, the initial permitting fee as well as other applicable permit fees will be due with the application for permit modification.

SPECIAL CONDITIONS

8. Should the facility wish to increase resin usage above 151,515 pounds per year, there is a stack testing requirement in the permit to determine if permittee estimates of emissions from this process are accurate, and to verify that the facility remains below 50% of the major HAP source threshold.

NESHAPS/MACT APPLICABILITY

9. Based on current emission estimates of the potential to emit (PTE) less than the proposed major source threshold, there are no sources at this facility for which NESHAPS/MACT standards have been proposed or promulgated.

NSPS APPLICABILITY

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

PUBLIC NOTICE

11. The draft permit was on public notice from April 17, 2006 to May 16, 2006. No written comments were received during the 30-day comment period.

MH/cmw
05/18/06