REVIEW REPORT

A&K Development Company
410 Chambers Street
Eugene, OR 97402
http://www.akdco.net/index.php

General Background Information

1. Lane Regional Air Protection Agency (LRAPA) has reviewed the facility’s annual report received on May 10, 2014. The contents of the annual report and subsequent correspondence with the source were the basis for the calculations contained within this review report.

2. A&K Development Company (‘A&K Development’ and/or ‘the facility’) operates a food processing equipment manufacturing facility at 410 Chambers Street in Eugene, Oregon. The operation comprises the manufacture of heavy equipment used in the in processing crops such as corn. The facility currently uses two (2) spray booths for painting manufactured equipment and also performs welding.

Emission Point Identification

3. The emission activities regulated by the permit include the following:

<table>
<thead>
<tr>
<th>Emission Unit</th>
<th>EU ID</th>
<th>Devices</th>
<th>Device ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Surface Coating Operations</td>
<td>EU-Surface Coating</td>
<td>Two (2) Paint Booths</td>
<td>#1A and #2B</td>
</tr>
<tr>
<td>Welding Activities</td>
<td>EU-Welding</td>
<td>NA</td>
<td>NA</td>
</tr>
</tbody>
</table>

Reasons for Permit Issuance

4. This permit is a new permit for an existing permitted facility. The facility had previously been issued a Basic ACDP under the category for surface coating operations using less than 250 gallons per month. In viewing the annual report for the 2013 calendar year, LRAPA noted that actual usage of surface coatings exceeded 250 gallons per month (3,740 gallons per year or an average of 312 gallons per month). Subsequent requests for detailed records and an onsite inspection confirmed the reported usage amount; actual emissions were estimated to be greater than 10 tons/year of VOC for the 2013 calendar year. The reason for this permit issuance is to modify the permit from a Basic to a Simple “High” ACDP and include PSELs, PSEL compliance methods and work and operational requirements. With the issuance of the Simple ACDP, LRAPA is also, in effect, establishing a 5-year permit term (i.e., in lieu of the 10 year permit term applicable to the facility as a Basic ACDP).
New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

5. This source is not subject to PSD for the affected criteria pollutants. The Generic PSEL of 39 tons VOC per year is below the 40 ton/year significant emission rate (SER) as established in LRAPA Title 12. The maximum estimated annual emissions of VOC for 2013 were approximately 10 tons/year. Likewise, the Generic PSELS of 24, 14, and 9 tons/year for PM, PM\textsubscript{10} and PM\textsubscript{2.5}, respectively, are all less than the SERs established in LRAPA Title 12 for each pollutant.

Enforcement Actions

6. There have been no enforcement actions initiated by LRAPA for this facility.

Source Tests

7. No source testing has been performed at this facility. Material Safety Data Sheets (MSDS), Certified Product Data Sheet, and material usage are used to determine the facility's VOC and HAP emissions.

Hazardous Air Pollutants (HAPs)

8. Actual and projected HAP totals are expected to be less than the major source thresholds. Facility uses acetone as primary cleaning/diluent solvent and indicated that have switched from Toluene.

9. The facility spray-applies coatings to metal surfaces of miscellaneous products that could be mobile (i.e. towed behind a vehicle) making the operations at the facility potentially subject to the '6H' area source National Emission Standard for Hazardous Air Pollutants (NESHAP). The facility has certified that spray-applied coatings at the facility do not contain one or more of the HAPs (e.g. Cadmium, Chromium, Manganese, Nickel and/or Lead) that would make the facility subject to the 6H NESHAP.

10. Additionally, the facility is not subject to the '6X' Metal Fabrication NESHAP because the facility is not classified in one of the nine major industrial groups that are subject to the rule. The facility manufactures food and crop processing equipment and is classified as "3556 – Food Products Machinery".

Plant Site Emission Limits (PSELS) Information

11. PSELS for the source restrict potential emissions from the facility to 39 tons per year of Volatile Organic Compounds (VOCs), 24 tons per year of PM, 14 tons per year PM\textsubscript{10} and 9 tons per year PM\textsubscript{2.5}. The emissions from welding were not quantified with this permit issuance but the permit contains the requirement that the facility keep records of welding rods consumed in order to obtain a future accurate estimate on PM emissions.

Baseline Emission Rate (BER)

12. The BER has been set at zero (0) tons per year for all pollutants since this source was not in operation during the 1978 baseline year.
Significant Emission Rate (SER)

13. The PSEL increase over the baseline emissions is less than the SER, as defined in LRAPA Title 12, for PM, PM$_{10}$, PM$_{2.5}$, VOC. No further air quality analysis is required for these pollutants.

Performance, Operational and Work Practice Standards and Limitations

14. The permittee is subject to the visible emissions standards in LRAPA 32-010, the particulate grain-loading standard in LRAPA 32-015, 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 permittee is also required to meet operational and work practice requirements for spray-applied coating and welding operations in order to ensure emissions are minimized to the greatest extent possible.

15. The permittee is subject to the PSEL rules in LRAPA 42-0040, 42-0043, 42-0060, and 42-0080. To assure compliance with the PSEL, detailed records are required to be maintained which demonstrate that the emissions of VOC are below the limits. As mentioned in Item 11 above, the emissions from welding were not quantified with this permit issuance but the permit contains the requirement that the facility keep records of welding rods consumed in order to obtain a future accurate estimate on PM emissions.

Monitoring, Recordkeeping and Reporting

16. The permittee is required to record all inspections and maintenance of air pollution control equipment including the paint booth filters. The permittee 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. Annual reports are required to document compliance with the HAP and VOC limits contained in the permit.

Public Notice

18. The draft permit was on public notice from November 7, 2014 to December 10, 2014. No written comments were submitted during the 35 day comment period.

Max/cmw
12/11/14
ABBRévIATIONS, ACRONYMS, AND DEFINITIONS

ACDP
Calendar Year
CFR
CO
CPDS
D
DEQ
dscf
EF
EPA
FCAA
gal
gr/dscf
HAP
I&M
K
lb
LRAPA
MMBtu
MSDS
NA
NESHAP
NOx
NSPS
NSR
O2
OAR
OERS
ORS
O&M
Pb
PCD
PM
PM10
PM2.5
ppm
PSD
PSEL
PTE
RM
SER
SIC
SIP
SO2
Special Control Area
VE
VOC
Year

Air Contaminant Discharge Permit
The 12-month period beginning January 1st and ending December 31st
Code of Federal Regulation
Carbon Monoxide
Certified Product Data Sheet
Density
Oregon Department of Environmental Quality
Dry Standard Cubic Foot
Emission Factor
US Environmental Protection Agency
Federal Clean Air Act
Gallon(s)
Grains per Dry Standard Cubic Foot
Hazardous Air Pollutant as defined by LRAPA Title 44
Inspection and Maintenance
Conversion Factor Constant
pounds
Lane Regional Air Protection Agency
Million British thermal units
Material Safety Data Sheet
Not applicable
National Emissions Standards for Hazardous Air Pollutants
Nitrogen Oxides
New Source Performance Standard
New Source Review
Oxygen
Oregon Administrative Rules
Oregon Emergency Response System
Oregon Revised Statutes
Operation and Maintenance
Lead
Pollution Control Device
Particle Matter
Particulate Matter less than 10 microns in size
Particulate Matter less than 2.5 microns in size
Part per million
Prevention of Significant Deterioration
Plant Site Emission Limit
Potential to Emit
Raw Material
Significant Emission Rate
Standard Industrial Code
State Implementation Plan
Sulfur Dioxide
As defined in LRAPA Title 29
Visible Emissions
Volatile Organic Compound
A period consisting of any 12-consecutive calendar months