

# Public Notice

## Comments Requested on Proposed Air Quality Permit Renewal for Atlas Industrial Coatings, Inc. dba A.I.C., Inc.

DEQ invites the public to submit written comments on the conditions of Atlas Industrial Coatings, Inc. doing business as A.I.C., Inc. the proposed air quality permit is a simple air contaminant discharge permit.

### Summary

The permittee refurbishes bakeware (roll and bread pans) for commercial bakeries. The facility is located at 17555 SW 63<sup>rd</sup> Avenue, Lake Oswego, OR. The process of refurbishing the pans includes soaking in solutions of hexylene glycol and diethylene glycol to remove the worn non-sticking coating, washing in a caustic solution to remove carbons, dipping in an acid bath to neutralize the caustic then drying in an oven. The dried pans are conveyed into a covered glazing machine, where a new non-stick coating is applied. Overspray is captured on a steel mesh screen. Coated pans are dried in an oven. The steel mesh screen is periodically cleaned with a solvent blend to remove the coating resin. The used deglazing solutions and the recovered coating resin are recycled back into the process. The facility was built in 1963, and was first permitted in 1999 under the VOC amnesty program.

### How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

Air Quality Permit Coordinator  
DEQ Northwest Region  
700 NE Multnomah St Ste 600  
Portland OR 97232-4100

**Fax:** 503-229-6945

**Email:** [NWRAQPermits@deq.state.or.us](mailto:NWRAQPermits@deq.state.or.us)

Written comments are due by 5 p.m. Monday Dec. 19, 2016.

### About the facility

Atlas Industrial Coatings, Inc. doing business as A.I.C., Inc. in Lake Oswego, OR submitted an application for a permit renewal on Sept. 30, 2013, for permit number 03-0009-SI-01.

### What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

### How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

### How does DEQ monitor compliance with the permit requirements?

The permittee must determine compliance with the annual plant site emission limit by monitoring monthly production. This data is used in a monthly calculation to determine emissions for each 12-consecutive month period. The permittee must retain records of all monitored parameters for at least five years. DEQ conducts compliance inspections to verify permit conditions are being met and reviews annual reports for actual emissions generated by the facility's overall operations.

### What happens after the public comment period ends?

DEQ considers and responds to all comments received and may modify the proposed permit based on comments. If a facility meets all legal requirements, DEQ will issue the facility's air quality permit.

### Where can I get more information?

Find out more and view the application at <http://www.oregon.gov/deq/Pages/publicnotice.aspx>, or contact:

Air Quality Permit Coordinator  
DEQ Northwest Region

**Phone:** 503-229-5582 or 800-425-4011

**Fax:** 503-229-6945

**Email:** [NWRAQPermits@deq.state.or.us](mailto:NWRAQPermits@deq.state.or.us)

View the application and related documents in person at the DEQ office in Portland. For a DEQ review appointment, call Susan Curry at 503-229-6736.



State of Oregon  
Department of  
Environmental  
Quality

Northwest Region  
Air Quality Program  
700 NE Multnomah St. Ste 600  
Portland, OR 97232

Phone: 503-229-5027  
800-452-4011  
Fax: 503-229-6945

Contact: Tina Leppaluoto,  
Permit Writer

Email:  
[leppaluoto.tina@deq.state.or.us](mailto:leppaluoto.tina@deq.state.or.us)

[www.oregon.gov/DEQ](http://www.oregon.gov/DEQ)

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To request a document in another format or language, call DEQ in Portland at 503-229-5696, or toll-free in Oregon at 1-800-452-4011, ext. 5696; or email [deqinfo@deq.state.or.us](mailto:deqinfo@deq.state.or.us).

**Emissions limits**

**Criteria Pollutants:** Table 1 below presents maximum allowable emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility’s actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

**Table 1**

| Criteria Pollutant         | Current Limit (tons/yr) | Proposed Limit (tons/yr) |
|----------------------------|-------------------------|--------------------------|
| Volatile Organic Compounds | 39                      | 39                       |

For more information about criteria pollutants, go to: [www.epa.gov/air/urbanair/](http://www.epa.gov/air/urbanair/)

**Hazardous air pollutants:**

Atlas Industrial Coatings, Inc. dba A.I.C., Inc. does not have the potential to be a major source of hazardous air pollutants. EPA has determined that these types of businesses do not warrant such regulation.

For more information about hazardous air pollutants, go to: [www.epa.gov/ttn/atw/hlthef/hapindex.html](http://www.epa.gov/ttn/atw/hlthef/hapindex.html)



SIMPLE  
AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality  
Northwest Region  
700 NE Multnomah St, Suite 600  
Portland, Oregon 97232  
503-229-5554

This permit is being issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

## ISSUED TO:

Atlas Industrial Coatings, Inc.  
DbA A.I.C., Inc.  
17555 SW 63<sup>rd</sup> Avenue  
Lake Oswego, Oregon 97035

## INFORMATION RELIED UPON:

Application No.: 027498  
Date Received: 09/30/13

## PLANT SITE LOCATION:

17555 SW 63<sup>rd</sup> Avenue  
Lake Oswego, Oregon 97035

## LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Tualatin  
Approval Date: 07/30/97

**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

Michael R Orman, E.I.T., Northwest Region Air Quality Manager

Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

| Table 1 Code | Source Description  | SIC/NAICS   |
|--------------|---|-------------|
| Part B, 85   | Source which would emit 10 or more tons/year of criteria pollutants if operated uncontrolled (bakeware refinishing) | 7690/811310 |

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## 1.0 GENERAL EMISSION STANDARDS AND LIMITS

- 1.1. Visible Emissions** The permittee must comply with the following visible emission limits from air contaminant sources other than fugitive emission sources, as applicable. Opacity must be measured as a six-minute block average using EPA Method 9, a continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60, or an alternative monitoring method approved by DEQ that is equivalent to EPA Method 9. Visible emissions from any air contaminant source must not equal or exceed an average of 20 percent opacity.
- 1.2. Particulate Matter Emissions** The permittee must comply with the following particulate matter emission limits for non-fuel burning equipment, as applicable. This condition does not apply to fugitive emissions sources.
- a. Particulate matter emissions from any air contaminant source installed, constructed, or modified on or after June 1, 1970 but before April 16, 2015 must not exceed 0.14 grains per dry standard cubic foot.
  - b. Particulate matter emissions from any air contaminant source installed, constructed, or modified on or after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot.
- 1.3. Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions, as measured by EPA method 22, by:
- a. Using, where possible, water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - b. Applying water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - c. Enclosing (full or partial) materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - d. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - e. Installing adequate containment during sandblasting or other similar operations;
  - f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;

- g. Promptly removing earth or other material that does or may become airborne from paved streets; and
- h. Developing a DEQ approved fugitive emission control plan upon request by DEQ if the above precautions are not adequate and implementing the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.

## 2.0 PLANT SITE EMISSION LIMITS

**2.1. Plant Site Emission Limits (PSEL)** The permittee must not cause or allow plant site emissions to exceed the following:

| Pollutant | Limit | Units         |
|-----------|-------|---------------|
| VOC       | 39    | tons per year |

**2.2. Annual Period** The annual plant site emissions limits apply to any 12-consecutive calendar month period.

## 3.0 COMPLIANCE DEMONSTRATION

**3.1. Mass Balance without controls** Annual VOC emissions from bakeware refurbishing, for each 12 consecutive calendar month period (12-month rolling total), are calculated by the following formula:

(Glaze and Cleaning Solvents)

$$E_{VOC-A} = [\sum(C_X * K_X) - W]/2000 \text{ lbs/ton}$$

where:

- $E_{VOC-A}$  = Annual VOC emissions in tons
- $C$  = Material usage for the period in gallons
- $K$  = VOC content (lbs VOC/gallon)
- $X$  = Subscript X represents a specific material
- $W$  = Weight of VOC shipped offsite in lbs

**3.2. PSEL Compliance Monitoring** Annual VOC emissions from bakeware refurbishing, for each 12 consecutive calendar month period (12-month rolling total), are calculated by the following formula:

(Deglazing)

$$E_{VOC-A} = \sum(B/1000 \times EF)/2000 \text{ lbs/ton}$$

where:

- $E_{VOC-A}$  = pollutant emissions (tons/yr)
- $B$  = bakeware Refurbished, annually (pans)
- $EF$  = pollutant emission factor (46.8 lbs per 1000 pans)

- 3.3. Combined Totals of VOC** Total annual VOC emission calculations from 3.1 and 3.2 above.
- 3.4. Emission Factor Verification** The permittee must perform an engineering test to verify the emission factors used in condition 3.1 and 3.2 above (similar to verification testing conducted in 2015). This test must be completed no later than 6 months prior to this permit expiration date. The permittee must submit the engineering test plan 15 days prior to the test date for DEQ's review.

#### 4.0 RECORDKEEPING REQUIREMENTS

- 4.1. Operation and Maintenance** The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:
- a. Units of bakeware refurbished;
  - b. Deglazing solvent usage, in gallons and VOC content;
  - c. Glaze solvent usage, in gallons and VOC content;
  - d. Cleaning solvent usage, in gallons and VOC content;
  - e. Monthly, calculated 12-month rolling VOC emissions, performed in accordance with Condition 3.0.
- 4.2. Excess Emissions** The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity as a six-minute block average. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).
- 4.3. Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.
- 4.4. Retention of Records** Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite.

## 5.0 REPORTING REQUIREMENTS

- 5.1. Excess Emissions** The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health.
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 8.0 by e-mail, telephone, facsimile, or in person.
  - b. If the excess emissions occur during non-business hours, the permittee must notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - c. The permittee must also submit follow-up reports when required by DEQ.
- 5.2. Annual Report** For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) copies of the following information for the previous calendar year:
- a. Operating parameters:
    - i. Units of bakeware refurbished;
    - ii. Calculations from Conditions 3.1 and 3.2; 12-month rolling total;
    - iii. Total VOCs emitted from Condition 3.3 in the previous year, in tons;
  - b. Records of all planned and unplanned excess emissions events.
  - c. Summary of complaints relating to air quality received by permittee during the year.
  - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
  - e. List of major maintenance performed on pollution control equipment.
- 5.3. Notice of Change of Ownership or Company Name** The permittee must notify DEQ in writing using a DEQ “Transfer Application Form” within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
  - b. Sale or exchange of the activity or facility.

- 5.4. Construction or Modification Notices** The permittee must notify DEQ in writing using a DEQ “Notice of Intent to Construct Form,” or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
  - b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
  - c. Constructing or modifying any air pollution control equipment.

## 6.0 ADMINISTRATIVE REQUIREMENTS

- 6.1. Permit Renewal Application** The permittee must submit the completed application package for renewal of this permit **120 days prior to the expiration date**. The permittee must submit two (2) copies of the application to the DEQ Permit Coordinator listed in Condition 8.2.
- 6.2. Permit Modifications** The permittee must submit an application for a modification of this permit not less than **60 days** prior to the source modification. When preparing an application, the applicant should also consider submitting the application **120 days** prior to allow DEQ adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office listed in Condition 8.1.

## 7.0 FEES

- 7.1. Annual Compliance Fee** The permittee must pay the Annual Fee specified in OAR 340-216-8020, Table 2, Part 2 for a Simple ACDP by **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date. **Late fees in accordance with Part 4 of the table will be assessed as appropriate.**
- 7.2. Change of Ownership or Company Name Fee** The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 3(a) with an application for changing the ownership or the name of the company.
- 7.3. Special Activity Fees** The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, Part 3 (b through k) with an application to modify the permit.

## 8.0 DEQ CONTACTS / ADDRESSES

- 8.1. Business Office** The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:  
Department of Environmental Quality  
Accounting / Revenue  
700 NE Multnomah St Ste 600  
Portland OR 97232-4100
- 8.2. Permit Coordinator** The permittee must submit all Notices and applications that do not include payment to the Northwest Region's Permit Coordinator:  
Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232-4100  
503-229-5554
- 8.3. Report Submittals** Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Northwest Region. If you know the name of the Air Quality staff member responsible for your permit, please include it.  
Northwest Region  
700 NE Multnomah St., Suite 600  
Portland, Oregon 97232-4100  
503-229-5554
- 8.4. Web Site** Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at [www.oregon.gov/deq](http://www.oregon.gov/deq).

## 9.0 GENERAL CONDITIONS AND DISCLAIMERS

- 9.1. Permitted Activities** This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, or is revoked.
- 9.2. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by DEQ.
- 9.3. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 9.4. Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.

- 9.5. DEQ Access** The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 9.6. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 9.7. Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340, division 264.
- 9.8. Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.
- 9.9. Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 9.10. Permit Expiration**
- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit:
    - i. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
    - ii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
  - B. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.
- 9.11. Permit Termination, Revocation, or Modification** DEQ may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

## 10.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

|                  |  |                      |   |
|------------------|--|----------------------|---|
| ACDP             | Air Contaminant Discharge Permit   | NSR                  | New Source Review   |
| ASTM             | American Society for Testing and Materials                                     | O <sub>2</sub>       | oxygen  |
| AQMA             | Air Quality Maintenance Area   | OAR                  | Oregon Administrative Rules                               |
| calendar year    | The 12-month period beginning January 1st and ending December 31 <sup>st</sup> | ORS                  | Oregon Revised Statutes                                   |
| CFR              | Code of Federal Regulations  | O&M                  | operation and maintenance                                 |
| CO               | carbon monoxide  | Pb                   | lead  |
| CO <sub>2e</sub> | carbon dioxide equivalent  | PCD                  | pollution control device                                  |
| DEQ              | Oregon Department of Environmental Quality                                     | PM                   | particulate matter  |
| dscf             | dry standard cubic foot  | PM <sub>10</sub>     | particulate matter less than 10 microns in size           |
| EPA              | US Environmental Protection Agency   | PM <sub>2.5</sub>    | particulate matter less than 2.5 microns in size          |
| FCAA             | Federal Clean Air Act  | ppm                  | part per million  |
| Gal              | gallon(s)  | PSD                  | Prevention of Significant Deterioration                   |
| GHG              | greenhouse gas   | PSEL                 | Plant Site Emission Limit                                 |
| gr/dscf          | grains per dry standard cubic foot   | PTE                  | Potential to Emit   |
| HAP              | Hazardous Air Pollutant as defined by OAR 340-244-0040                         | RACT                 | Reasonably Available Control Technology                   |
| I&M              | inspection and maintenance   | scf                  | standard cubic foot                                       |
| lb               | pound(s)   | SER                  | Significant Emission Rate                                 |
| MMBtu            | million British thermal units  | SIC                  | Standard Industrial Code                                  |
| NA               | not applicable   | SIP                  | State Implementation Plan                                 |
| NESHAP           | National Emissions Standards for Hazardous Air Pollutants                      | SO <sub>2</sub>      | sulfur dioxide  |
| NO <sub>x</sub>  | nitrogen oxides  | Special Control Area | as defined in OAR 340-204-0070                            |
| NSPS             | New Source Performance Standard  | VE                   | visible emissions   |
|                  |  | VOC                  | volatile organic compound                                 |
|                  |  | year                 | A period consisting of any 12-consecutive calendar months |



State of Oregon  
Department of  
Environmental  
Quality

## Simple AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Department of Environmental Quality  
Northwest Region

### Source Information:

|       |        |
|-------|--------|
| SIC   | 7690   |
| NAICS | 811310 |

|   |            |
|---|------------|
| Source Categories<br>(Table 1 Part, code) | Part B, 85 |
| Public Notice Category                    | II         |

### Compliance and Emissions Monitoring Requirements:

|                      |  |
|----------------------|--|
| FCE                  |  |
| Compliance schedule  |  |
| Unassigned emissions |  |
| Emission credits     |  |
| Special Conditions   |  |

|                       |  |
|-----------------------|--|
| Source test [date(s)] |  |
| COMS                  |  |
| CEMS                  |  |
| PEMS                  |  |
| Ambient monitoring    |  |

### Reporting Requirements

|                                 |             |
|---------------------------------|-------------|
| Annual report<br>(due date)     | February 15 |
| Quarterly report<br>(due dates) |             |

|                               |  |
|-------------------------------|--|
| Monthly report<br>(due dates) |  |
| Excess emissions report       |  |
| Other (specify)               |  |

### Air Programs

|                         |  |
|-------------------------|--|
| Synthetic Minor (SM)    |  |
| SM -80                  |  |
| NSPS (list subparts)    |  |
| NESHAP (list subparts)  |  |
| Part 68 Risk Management |  |
| CFC                     |  |

|                 |   |
|-----------------|---|
| NSR             |   |
| PSD             |   |
| RACT            |   |
| TACT            | X |
| Other (specify) |   |

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## PERMITTING

### PERMITTEE IDENTIFICATION

1. Atlas Industrial Coatings, Inc.  
Dba A.I.C., Inc.  
17555 SW 63<sup>rd</sup> Avenue  
Lake Oswego, Oregon 97035

### PERMITTING ACTION

2. The proposed permit is a renewal of an existing Air Contaminant Discharge Permit (ACDP) that was issued on 12/05/2008 and was originally scheduled to expire on 12/01/2013. The existing ACDP remains in effect until final action is taken on the renewal application because the permittee submitted a timely and complete application for renewal.

### OTHER PERMITS

3. No other permits have been issued or are required by DEQ for this source.

### ATTAINMENT STATUS

4. The facility is located in a maintenance area for ground-level ozone and is a moderate source of VOCs. VOCs can chemically react with NO<sub>x</sub> compounds to form ground-level ozone in the atmosphere, typically during the summer months. The facility is an insignificant source of NO<sub>x</sub> emissions (less than one ton/year). The facility is also located in a maintenance area for CO and is an insignificant source of CO (less than one ton/year).

## SOURCE DESCRIPTION

### OVERVIEW

5. A.I.C., Inc. refurbishes bakeware (roll and bread pans) for commercial bakeries. The pans are soaked in solutions of hexylene glycol and diethylene glycol to remove the worn non-sticking coating, washed in a caustic solution to remove carbon, dipped in an acid bath to neutralize caustics, and then dried in an oven. The dried pans are conveyed into a covered glazing machine where a new non-stick coating is applied. Overspray is captured on a steel mesh screen. Coated pans are dried in an oven.

The steel mesh screen is periodically cleaned with a solvent blend to remove the coating resin. The used deglazing solutions and the recovered coating resin are recycled back into the process. The facility was built in 1963, and was first permitted in 1999 under the VOC amnesty program.

6. No changes have been made to the facility since the last permit renewal.

#### PROCESS AND CONTROL DEVICES

7. Air contaminant sources at the facility consist of soaking and rinse tanks, a covered automatic coater and two small natural gas fired ovens.

#### COMPLIANCE

8. The facility was inspected on February 12, 2015 and found to be in compliance with permit conditions.
9. During the prior permit period there were no complaints recorded for this facility.
10. No enforcement actions have been taken against this source since the last permit renewal.

#### EMISSIONS

11. Proposed PSEL information:

| Pollutant | Baseline Emission Rate (tons/yr) | Netting Basis      |                    | Plant Site Emission Limits (PSEL) |                         |                         |
|-----------|----------------------------------|--------------------|--------------------|-----------------------------------|-------------------------|-------------------------|
|           |                                  | Previous (tons/yr) | Proposed (tons/yr) | Previous PSEL (tons/yr)           | Proposed PSEL (tons/yr) | PSEL Increase (tons/yr) |
| VOC       | 0                                | 0                  | 0                  | 39                                | 39                      | 0                       |

- a. The proposed PSEL is equal to the Generic PSEL in accordance with OAR 340-216-0064(3)(b) and the netting basis is zero in accordance with OAR 340-222-0040(3).
- b. Actual VOC emissions remain constant at about 20 tons/year.
- c. PSELs were not established for PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, and CO because emissions are less than one ton/year for each pollutant. The emissions from natural gas combustion are less than one ton/year. As a result, the recordkeeping and reporting of natural gas usage was removed during this permit renewal.
- d. PSEL for HAPs are not included in this permit. Combined HAP emissions from the facility have consistently been less than one ton/year.
- e. The PSEL is based on organic chemical usage associated with refurbishing 700,000 units of bakeware and includes 5,900 gallons of Dow Corning Release Coating at 8.5 lb VOC/gallon and 4,500 gallons of glaze at 2.63 lb VOC/gallon.

- f. DEQ and the permittee established an emission factor for the blend product during this permit renewal. The blend product emission factor was based on an engineering test performed in 2015, which resulted in the following calculation: 170 pans x 12 baskets = 2040 weighted average pans during engineering test in 2015; 11.25 gallons evaporated divide by per 2040 pans x 1000 pans = 5.51 gallons per 1000 pans; 5.51 gallon per 1000 pans x 8.5 lbs per gallon = 46.8 lbs per 1000 pans. Emissions are calculated as follows: take the number of pans processed over a rolling 12-month period, divide by 1000, multiply 46.8 lbs/1000 pans, divide by 2000 pounds/ton, the result is tons/year of emissions over a rolling 12-month period.
- g. The PSEL is a federally enforceable limit on potential to emit.

#### SIGNIFICANT EMISSION RATE ANALYSIS

12. For each pollutant, the proposed Plant Site Emission Limit is less than the Netting Basis plus the significant emission rate, thus no further air quality analysis is required.

#### TITLE V MAJOR SOURCE APPLICABILITY

13. A major source is a facility that has the potential to emit 100 tons/yr or more of any criteria pollutant or 10 tons/yr or more of any single HAP or 25 tons/yr or more of combined HAPs.
14. This facility is considered a true minor source because its potential to emit is less than the applicable major source thresholds.

#### CRITERIA POLLUTANTS

15. This facility is not a major source of criteria pollutant emissions.

#### HAZARDOUS AIR POLLUTANTS

16. This source is a minor source of hazardous air pollutants.

#### ADDITIONAL REQUIREMENTS

#### NSPS APPLICABILITY

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

NESHAPS/MACT APPLICABILITY

18. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated. There are no emergency generators or fire pumps on site.

RACT APPLICABILITY

19. The facility is located in the Portland AQMA, but is not one of the listed source categories in OAR 340-232-0010 and does not have potential to emit 100 tons VOC/year, thus the RACT rules do not apply.

TACT APPLICABILITY

20. The source is meeting the State's TACT/Highest and Best Rules by collecting and reusing washing solutions, release coating, and thinner/clean-up solvent.

PUBLIC NOTICE

21. Pursuant to OAR 340-216-0064(3)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on Nov. 10, 2016 and the comment period will end on Dec. 19, 2016 at 5 p.m.**

tll:dk