

Department of Environmental  lity  
Western Region  
Air Quality Program

Standard  
AIR CONTAMINANT DISCHARGE  PERMIT  
REVIEW REPORT  
FOR  
MODIFICATION NO. 3

Akzo Nobel Coatings Inc.  
1660 Cross Street, SE  
Salem, Oregon 97309  
(503) 585-2700

1. The Department is proposing to issue a permit modification (Addendum No. 3) to the existing Air Contaminant Discharge Permit which was issued on June 10, 2005, and which is scheduled to expire on May 1, 2010. The permit was administratively modified (Addendum No. 1) on January 20, 2006. Another administrative modification was issued on May 8, 2006, (Addendum No. 2).
2. Upon request by the permittee the Department is proposing to increase the Plant Site Emission Limits (PSELs) for Particulate Matter (PM), Fine Particulate Matter (PM<sub>10</sub>) and Volatile Organic Compounds (VOCs). The requested increases are due to anticipated increases in future production with the addition of new process equipment. The requested PSEL increases are being set at a level of one ton less than the significant emission rate plus the baseline emission rate and therefore no further air quality analysis is required.
3. The new equipment to be added is as follows:  
Process Tanks: F-4B (1050 gallons), F-42 (3000 gallons), I-1A (1050 gallons), L-4000 (4000 gallons)  
High Speed Dispersers: HSD #204, HSD #104, HSD #107, HSD#109  
Baghouses: BH8 and BH9
4. The proposed PSELs are detailed as follows:

## 5. 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)
PM	13	13	13	24	<b>37</b>	<b>+13</b>
PM <sub>10</sub>	13	13	13	14	<b>27</b>	<b>+13</b>
SO <sub>2</sub>	-0-	Negl.	-0-	NA	NA	NA
NO <sub>x</sub>	1	1	1	39	39	0
CO	1	1	1	99	99	0
VOC	15	15	15	41	<b>54</b>	<b>+13</b>
Combined HAPs	NA	NA	NA	24	24	0
Individual HAP	NA	NA	NA	9	9	0

- proposed PSELs for CO, NO<sub>x</sub>, and HAPs have been set at the Department's Generic PSEL levels in accordance with OAR 340-222-0041(1) since the projected emission levels are less than the Generic PSEL level but greater than the de minimis level for those pollutants.
  - The proposed PSEL for VOCs is being set at the potential to emit in accordance with OAR 340-222-0041(3).
  - PSEL is being proposed for SO<sub>2</sub> because the potential to emit is less than the Department's de minimis level.
  - baseline emission rates and netting basis were "frozen" in accordance with OAR 340-200-0020(71) during the last permit renewal in June of 2005.
  - The increase in the PSELs for PM, PM<sub>10</sub>, VOC are set at one ton less than the significant emission rate plus the baseline emission rate.
  - The PSEL is a federally enforceable limit on the potential to emit.
6. The facility has requested to change their emission factors pursuant to Condition 3.2 of their permit. This condition allows the facility to update their emission factors with Department approval. The facility is proposing a more conservative emission factor than was previously approved. The emission factor changes are as follows:

Previous Emission Factor	New Emission Factor
PM 0.0003 lb/lb pigment	0.00162 lb/lb pigment
PM <sub>10</sub> 0.0003 lb/lb pigment	0.001377 lb/lb pigment