

Department of Environmental Quality
 Air Quality Division

OREGON TITLE V OPERATING PERMIT APPLICATION REVIEW REPORT

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| PSEL CRED | SOURCE TEST | CMS | AMB MON | COMPL SCHED | SPEC COND | REPORT | | | EXCESS | | NSPS | NSR | PSD | NESHAP | SIZE | | | PUBL NOTC |
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INTRODUCTION

1. This is a renewal of existing Title V permit 26-2492. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.
2. There were not any off-permit changes, 502(b)(10) changes, administrative amendments, and minor modifications which occurred during the last permit renewal.
3. Condition-by condition changes between previous permit 26-2492 and this renewal permit 26-2492:

| New Permit Condition Number | Old Permit Condition Number | Description of change | Reason for change |
|-----------------------------|-----------------------------|--|--|
| 3 | Table 1 | Removed EU ID DMSTR1 and replaced with EU ID HEAF Unit; Added BGHS7, 8,9, and 10 | EU ID DMSTR1 is no longer used; the HEAF unit is the primary pollution control device used for EU ID 4-CT; future baghouses to be installed at the coating and lining mixers of the concrete batch plant. |
| 14 | 22a | Removed EU ID DMSTR1 | EU ID DMSTR1 is no longer used; the HEAF unit is the primary pollution control device used for EU ID 4-CT. |
| 16 | 24 | Changed language to include all future baghouses, including BGHS7-10 to the monitoring requirement for the visible emission standard | Future baghouses to be installed at the coating and lining mixers of the concrete batch plant |
| 25 | Table 4 | Removed EU ID DMSTR1 and replaced with EU ID HEAF; Added BGHS4 and BGHS7-10 to the table | EU ID DMSTR1 is no longer used; the HEAF unit is the primary pollution control device used for EU ID 4-CT; BGHS4 should have already been included and BGHS7-10 are for future baghouses installed at the coating and lining mixers of the concrete batch plant. |

| New Permit Condition Number | Old Permit Condition Number | Description of change | Reason for change |
|-----------------------------|-----------------------------|---|---|
| 27 | 25 | Changed language to include all future baghouses, including BGHS7-10 to the maintenance requirement emission standard | Future baghouses to be installed at the coating and lining mixers of the concrete batch plant |
| 28 | 23 | Removed EU ID DMSTR1 | EU ID DMSTR1 is no longer used; the HEAF unit is the primary pollution control device used for EU ID 4-CT. |
| 32 | 13 | Adjusted CO and SO ₂ PSELS to zero | PSELS are not required for SO ₂ and CO since they will be emitted at less than the de minimis emission level |
| 33b | 27b | Updated emission factors for EU ID 1-WH, 6-CBP, and 8-SBL | Updated AP 42 Emission factors |
| 34b | 32i | Changed "annual" to specifically, 12-month rolling basis | Updated regulation language |
| | 32k | Deleted permit condition | Part of 1 ton insignificant emissions calculated under PSELS |
| 37 | | Addition of permit condition for the due date for compliance with the NESHAP MACT standard | Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart Mmmm |
| 38 | | Addition of permit condition for the major modification requirement for compliance with the NESHAP MACT standard | Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart Mmmm |
| 51c. vi. | | Addition of permit condition for the semiannual reporting requirements for compliance with the NESHAP MACT standard | Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart Mmmm |
| 51 | 39b | Moved annual report due date and requirements conditions | Streamlining of the permit condition |
| 51g | | Addition of permit condition for the annual reporting requirements for compliance with the NESHAP MACT standard | Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart Mmmm |
| G4 | | Addition of permit condition pertaining to masking emissions | Addition of general permit condition in the regulations |

FACILITY DESCRIPTION

4. Northwest Pipe Company owns and operates a steel pipe fabricating facility located at 12005 N. Burgard in Portland, Oregon. Northwest Pipe Company manufactures spiral and straight seam metal pipe. At this time, the facility is only manufacturing spiral seam metal pipe, making the UV filter unit emission unit unnecessary to operate. Steel sheets are formed into pipe, fluxed and welded, cleaned by blasting, and coated. If additional milling has to be done to the pipe (installation of fittings), the pipe is coated, milled, re-cleaned by sandblasting, and recoated. Each job is specific to what the customer needs. Pollution sources at the facility include emissions from solvents in the pipe coatings, smoke/fume from coal tar application, particulate matter from blasting and cement handling, and fugitive dust from vehicle traffic.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

5. The emissions units at this facility are the following:

1-WH: This emissions unit covers vehicle traffic (forklifts carrying steel pipe) on unpaved surfaces at the facility. Fugitive emissions include PM and PM₁₀.

3-CL: This emissions unit includes the coating of metal parts for purposes of compliance with the Reasonably Achievable Control Technology (RACT) requirements and for compliance with particulate emission standards. Currently, the facility has ceased manufacturing straight seam metal pipe making the UV filter unit unnecessary to operate. However all permit conditions related to the UV filter unit and straight seam metal pipe work has remained in the permit upon permittee request upon the event that they will reinstate the work in the future.

Pipe is coated and/or lined with various primers, coal tar, cement, tapes, ultra violet cured (UV) coatings, and other products. The emissions are PM and PM₁₀, VOCs, and possibly non-VOC and VOC HAPs. PM and PM₁₀ emissions from the UV coating line are included in aggregate insignificant activities. PM, PM₁₀, and non-VOC HAPs emissions from coal tar lining and coating are controlled by the following control devices:

| Pollution Control Device (PCD) /Practice | PCD ID |
|--|--------|
| HEAF Unit | HEAF |
| UV Filter Unit (future) | UVFLTR |
| North Demister | DMSTR2 |
| South Demister | DMSTR3 |
| Hand Patch Demister | DMSTR4 |

This emission unit includes the pipe coating activities for purposes of compliance with the RACT limits. The VOC emissions from these activities are included in EU 7-VOC for PSEL purposes.

4-CT: This emissions unit is comprised of coal tar storage vats used for melting and storing molten coal tar. Coal tar storage vats hold coal tar at the operating temperature required to coat and line pipe. Emissions are PM, PM₁₀, VOCs, and HAPs (polynuclear organic matter - POM). Particulate matter emissions are controlled by a HEAF unit.

5-NG: This emissions unit consists of two boilers generating steam to cure cement lining and coating along with miscellaneous burners and pipe warmers. Emissions occurring from natural gas combustion

include PM, PM₁₀, CO, SO₂, NO_x VOCs, and HAPs. The emissions of PM, PM₁₀, SO₂, CO and VOCs from this emissions unit are considered insignificant in aggregate.

6-CBP: This emissions unit includes the concrete batch plant where cement is mixed with sand aggregate. Fugitive emissions from cement batching and sand storage piles are insignificant (included in the aggregate insignificant total). Emissions are PM and PM₁₀. The particulate matter emissions from the bin vents are controlled by filters BGHS3 and BGHS4. The facility plans to enclose the coating and lining mixers of the concrete batch plant, further controlling for any PM and PM₁₀ fugitive emissions by installing additional baghouses, PCD ID BGHS7 and BGHS8.

7-VOC: This emissions unit includes VOC emissions from the use of VOC containing materials for all non-insignificant activities at the facility, including coatings included in EU 3-CL, for the purposes of compliance with the PSELS. Emissions consist of VOC and VOC-HAPs.

8-SBL: (Shot Blasting) Fabricated pipes are blasted inside and outside to prepare the surface for coatings and other applications. Emissions are comprised of PM, PM₁₀, and metal HAP. Particulate matter emissions are controlled by the following pollution control devices:

| Pollution Control Device (PCD) /Practice | PCD ID |
|--|--------|
| Cyclone | CYCL1 |
| Cyclone | CYCL2 |
| Baghouse | BGHS1 |
| Baghouse | BGHS2 |
| Baghouse | BGHS9 |
| Baghouse | BGHS10 |

9-GBL: (Sand Blasting) Special fabricated and miscellaneous pipe pieces (elbows, etc.) and other metal parts are blasted inside and outside to prepare the surface for coatings and other applications. Emissions from this emission unit are comprised of PM, PM₁₀ and metal HAP.

| Pollution Control Device (PCD) /Practice | PCD ID |
|--|--------|
| Cyclone | CYCL3 |
| Baghouse | BGHS5 |
| Baghouse | BGHS6 |

6. Source Classification Codes

| Emissions Unit | EU ID | Source Classification Code (SCC) |
|---|-------|---|
| Unpaved Vehicle Traffic | 1-WH | 3-07-888-02 |
| Pipe Coating and Lining | 3-CL | 4-02-001-01 3-09-016-06 3-09-016-03 |
| Coal Tar Vats | 4-CT | 3-09-016-04 |
| Concrete Batch Plant (for non fugitives only) | 6-CBP | 3-05-011-15 |
| Natural Gas Combustion (for NO _x only) | 5-NG | 1-03-006-03 |
| Facility wide VOCs (for PSELS) | 7-VOC | NA |
| Interior and Exterior Pipe Shot Blast (for non fugitives only) | 8-SBL | 3-09-002-07 |
| Sand (Grit) Blast (for non fugitives only) | 9-GBL | 3-09-002-05 |

7. Activities which are insignificant in aggregate include the following:

- 7.a. 2-WLD pipe welding. Welding operations generate metal fumes, as well as particulate matter. Emissions from welding include PM, PM₁₀, and metal HAPs.
- 7.b. 5-NG natural gas combustion devices (for PM, PM₁₀, SO₂, CO and VOC only);
- 7.c. 6-CBP pile (PM and PM₁₀ fugitives);
- 7.d. 8-SBL fugitives (PM and PM₁₀ fugitives).
- 7.e. PM and PM₁₀ from the UV coating line.
- 7.f. VOC emissions from use of spray cans.

8. The following categorically insignificant activities are present at the facility:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under Divisions 20 through 32 of this chapter, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year
- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Food service activities
- Janitorial activities
- Personal care activities
- Grounds keeping activities including, but not limited to building painting and road and parking lot maintenance
- On-site laundry activities
- On-site recreation facilities
- Instrument calibration

- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Air purification systems
- Demineralized water tanks
- Electrical charging stations
- Fire brigade training
- Instrument air dryers and distribution
- Blueprint making
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Storm water settling basins
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- Health, safety, and emergency response activities
- Emergency generators and pumps used only during loss of primary equipment or utility service
- Ash piles maintained in a wetted condition and associated handling systems and activities
- Combustion source flame safety purging on startup

APPLICABLE REQUIREMENTS (EMISSIONS LIMITS AND STANDARDS)

9. The following state and federally enforceable rule requirements have been determined to be applicable to this facility:

Division 208 rule 0110(2): 20% opacity for no more than 3 minutes in any one hour;
Division 228 rule 0210(1)(b): 0.1 gr/dscf for fuel burning equipment;
Division 226 rule 0210(2): 0.1 gr/dscf for non-fuel burning equipment;
Division 208 rule 0210(2): Prevent fugitive dust in special control areas;
Division 232 rule 0160(5)(j): Surface coating VOC emission limits in lbs VOC/ gal (minus water);
Division 208 rule 0600: 20% opacity for no more than 30 seconds in any one hour;
Division 208 rule 0620: Particulate matter size standard.

COMPLIANCE ASSURANCE MONITORING (CAM)

10. The requirements of 40 CFR Part 64 "Compliance Assurance Monitoring" or (CAM) apply to emissions units at Major Sources that have potential emissions greater than the major source thresholds (not including controls) and use a control device to comply with an emission limitation. Northwest Pipeline Company is a major source and several emissions units use control devices to comply with emission limitations, but none of the emissions units have pre-control emissions greater than the applicable thresholds. Therefore, none of the emissions units is subject to CAM requirements.

CHANGES TO THE PERMIT

11. The permit condition language has been revised in some conditions. As well, the formatting and thus, the order of permit conditions have been revised. This has been done to make the conditions and compliance obligations more clear. These changes do not affect applicability or standards.
12. Some general permit conditions were added in this renewal permit to reflect additional regulations that have been adopted since the prior permit. These additions do not affect applicability or standards.
13. The facility is subject to NESHAP MACT standard 40 CFR Part 63 Subpart M because it performs surface coating of miscellaneous metal parts and products and is a major source of HAP emissions. All applicable regulations were included in this renewal permit.
14. The facility is planning to reduce PM and PM₁₀ fugitive emission further by enclosing the lower bins to the concrete batch plant and installing two additional baghouses. This permit and all applicable regulations and permit conditions reflect the Type 1 project with the addition of PCD ID BGHS7 and BGHS8 for EU ID 6CBP and PCD ID BGHS9 and BGHS10 for EU ID 8-SBL (the emission limits, monitoring, recordkeeping, and reporting requirements at this time for any additional future baghouses).

TEST METHODS AND PROCEDURES

15. The permittee is not required to conduct source tests except for visible emission surveys using EPA Method 22 and possibly EPA Method 9. A requirement to perform testing in accordance with the Department's Source Sampling Manual has been included in the permit if other testing is performed. The Department and EPA has the authority to require testing not included in this permit if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct testing to confirm compliance status. In either case, the methods to be used for are included in the permit.

MONITORING REQUIREMENTS

Facility-Wide Monitoring Requirements

16. Monitoring for the odor and particle fallout prohibitions will be done by maintaining a log of related complaints received by at the facility. These requirements are only enforceable by the State. This facility is also subject to a facility-wide requirement to take reasonable precautions to prevent fugitive particulate emissions. To monitor for this requirement, a representative of Northwest Pipe Inc. will tour the facility once each calendar quarter looking for sources of fugitive emissions. When fugitive emissions are observed leaving the plant site, corrective action will be taken. The source of the emissions will then be rechecked within three days. If visible emissions are still present, an opacity compliance test will be performed.
17. For particulate emissions from Pipe Coating and Lining (3-CL) and Coal Tar Tanks (4-CT), a representative of Northwest Pipe Inc. will perform a visible emission survey at the exhaust points one time per calendar month. These emissions sources are not likely to violate the opacity or particulate standards when the associated control equipment is operated. In addition to the surveys, the control devices will be inspected and maintenance performed at least one time each month.
18. For particulate emissions from Baghouse Controlled Emission Units (6-CBP, 8-SBL, and 9-GBL), a representative of Northwest Pipe Inc. will perform a visible emission survey at the exhaust points one time per calendar month. These emissions sources are not likely to violate the opacity or particulate standards when the baghouses are operated properly. In addition to the surveys, the baghouses will be inspected and maintenance performed at least one time each month.
19. For monitoring for the RACT coating requirements for Coating Line Emissions Unit (3-CL), Northwest Pipe Inc. will maintain records of all the coatings used, showing that all coatings used on any day are individually compliant with the RACT limit, or they will perform the compliance calculation to show that the average RACT limit was met.

Plant Site Emissions Limits Monitoring Requirements

20. The Plant Site Emission Limits regulate PM, PM₁₀, NO_x, and VOC emissions from the entire facility and includes emissions from the aggregate insignificant activities. Compliance will be demonstrated by recordkeeping the following: quantities and types of coatings used, the hours of operation of the particulate control equipment, the amount of natural gas used, and the miscellaneous VOC use at the facility. As well, emissions will be calculated using the methods and emission factors in the permit. The emission factors based on AP-42 for the unpaved vehicle traffic, concrete batch plant, and interior and exterior pipe shot blast (EU IDs 1-WH, 6-CBP, and 8-SBL, respectively) have changed from the prior permit due to updated methodology providing better calculations. The emissions from aggregate insignificant activities are included in the PSELs at the aggregate insignificant emissions limit of 1.0 ton per year. The Plant Site Emission Limits for SO₂ and CO have been adjusted to zero since PSELs are not

required for criteria pollutants that will be emitted at less than the de minimis emission level for the source as set out in OAR 340-222-0020(3)(a).

Insignificant Activities Compliance Assurance Monitoring Requirements

21. As identified earlier in this Review Report, this facility has insignificant emissions units (IEUs) that include categorically insignificant activities and aggregate insignificant emissions, as defined in OAR 340-028-0110. For the most part, the standards that apply to IEUs are for opacity (20% limit) and particulate matter (0.1 gr/dscf limit). The Department does not consider it likely that IEUs could exceed an applicable emissions limit or standard because IEUs are generally equipment or activities that do not have any emission controls (e.g., small natural gas fired space heaters) and do not typically have visible emissions. Since there are no controls, no visible emissions, and the emissions are less than one ton per year, the Department does not believe that monitoring, recordkeeping, or reporting is necessary for assuring compliance with the standards.

RECORDKEEPING REQUIREMENT

22. The permit includes requirements for maintaining records of all monitoring and testing required by the permit. These records include test results, parameter monitoring data, visible emission data, the date and time of measurements; and all corrective actions, including the date, time, and outcome.

REPORTING REQUIREMENTS

23. The permit includes requirements for submitting semi-annual and annual monitoring reports that include compliance certifications. The annual monitoring report also includes operation data, emissions data, excess emission log, and an emission fees report. The permittee is required to immediately notify the Department of any excess emissions and keep records of the excess emissions.

PLANT SITE EMISSION LIMITS (PSEL)

Proposed Plant Site Emissions Limits (PSEL), Netting Basis and Baseline Emissions Rate:

| Pollutant | Baseline Emission Rate (tons/yr) | Netting Basis (tons/12-mo) | Plant Site Emission Limit (PSEL) | | | Significant Emission Rate (tons/12-mo) |
|------------------|----------------------------------|----------------------------|----------------------------------|----------------------------|----------------------------|--|
| | | | Previous PSEL (ton/12-mo) | Proposed PSEL (tons/12-mo) | PSEL Increase (tons/12-mo) | |
| PM | 92 | 92 | 73 | 73 | no change | 25 |
| PM ₁₀ | 43 | 43 | 28 | 28 | no change | 15 |
| CO | 1.0 | 0 | 99 | ---- | [99] | 100 |
| NO _x | 3.0 | 3 | 39 | 39 | no change | 40 |
| SO ₂ | 1.0 | 0 | 39 | ---- | [39] | 40 |
| VOC | 347 | 247 | 247 | 247 | no change | 40 |

Note: Decreases in brackets

Baseline Emission Rate

24. The Baseline emissions rate is an estimate of actual emissions in the Baseline year, 1978. Baseline emission estimates for this facility are based on a production rate of 4,000,000 feet of pipe, 4745 hours/year operation, and the ratio of 1986 production/emissions to 1978 production/emissions. The ratio approach was used to calculate baseline for the 1993 ACDP permit renewal. Emissions of CO and SO₂ were each

less than 1 ton/year. The Baseline Emissions Rate was revised during the application process; the revised rates are shown in the table above.

Netting Basis

25. The Netting Basis is equal to the Baseline Emission Rate minus any rule required or voluntary reductions, plus any emissions increases approved through New Source Review. The VOC Netting Basis was decreased by 100 tons/year from the Baseline Emission Rate of 347 tons/year reflecting the 09/13/96, Mutual Agreement and Order and 01/24/97 ACDP modification in which Northwest Pipe Company voluntarily gave up 100 tons/year of VOC baseline and PSEL. There have been no emissions increases approved through New Source Review for this facility.

Plant Site Emission Limit (PSEL)

26. The Previous PSEL level for NO_x was set at the generic PSEL level; this was done solely because of the implementation of new Department Rules that do not support PSEL levels less than the "generic PSEL" levels. The generic PSEL levels are equal the Significant Emission Rate minus 1 ton per 12 month period, for each pollutant. This renewal maintains the generic level PSEL for NO_x. The only change in PSELs in this permit are for CO and SO₂. The PSELs for CO and SO₂ have been adjusted to zero to reflect updated regulation language regarding de minimis amounts as set out in OAR 340-222-0020 (3)(a). The regulation states that PSELs are not required if emissions will be less than the de minimis emission level. In addition, a future project (classified as a Type 1 change) will further reduce fugitive PM and PM₁₀ emissions from the cement batch plant by replacing two mixers and installing two additional baghouses at the lower section of the cement batch plant. As well, two cartridge dust collectors (PCD ID BGHS9 and BGHS10) will replace PCD IDs CYC1, CYC2, BGHS1, and BGHS2 for the interior and exterior shot blasting emission unit. The permit includes all necessary requirements for the additional baghouses. Upon renewal of this permit, the PSEL will reflect the change/decrease in PM and PM₁₀ emissions from the project.

Significant Emission Rate

27. The proposed PSEL levels are less than or the same as the baseline emission rates for all pollutants except for NO_x. This increase is due solely to the implementation of new Department Rules that do not support PSEL levels less than the generic PSEL levels. The increase above the Netting Basis is less than the Significant Emission Rates for this pollutant, which is listed above. The annual PSEL for VOC is the same as the Netting Basis after the Mutual Agreement and Order and ACDP modification in which Northwest Pipe Company voluntarily gave up 100 tons/year of VOC PSEL.

HAZARDOUS AIR POLLUTANTS

28. The facility is a major source of HAP emissions. The table below summarizes the 2004 HAP annual emissions.

| <u>HAP</u> | <u>2004 Emission (tons/year)</u> |
|----------------------|----------------------------------|
| Carbon Tetrachloride | 0.01 |
| Ethylbenzene | 1.0 |
| MDI | 0.1 |
| Methyl Ethyl Ketone | 3.4 |
| Methylene Chloride | 9.0 |
| PAC | 0.03 |
| Phenanthrene | 0.03 |
| Toluene | 0.9 |
| Xylene | 4.8 |
| Manganese | 0.9 |
| <u>Formaldehyde</u> | <u>0.01</u> |
| Total | 20.2 tons/year |

29. Note: If and when DEQ delists MEK as a hazardous air pollutant, Northwest Pipe Company may discontinue monitoring for MEK from that point forward.

COMPLIANCE HISTORY

30. Previous inspections of the facility occurred on 03/25/97, 05/30/96, 09/27/95, and 08/22/94. The 08/22/94 inspection found that the company was including cement coating and lining in its daily RACT average. The Department notified the facility on 09/06/94 and 04/18/95 that cement was not a coating regulated by the RACT surface coating VOC limit, and should not be included in the RACT average. The Department determined that without cement, the RACT daily average was exceeded on days in 1994 and 1995. The inspections found the facility was operating in compliance with other requirements.

31. A Mutual Agreement and Order AQP-NWR-95-237 was entered on 11/04/95, containing a compliance schedule to resolve the RACT VOC violation. The MAO entered into by Northwest Pipe and the Department on 11/04/95 required final compliance by 07/01/97, or submittal of an alternative emission limit request at that time. At Northwest Pipe's request, the MAO final compliance date was extended to 01/01/98, per addendum signed 06/20/97. On 12/16/97, Northwest Pipe submitted a Final MAO Report, stating that Northwest was then in full compliance with the RACT requirements. Northwest Pipe is continuing to work on reducing the VOC emissions from coating processes through the substitution of lower VOC coatings and the installation of a ultra violet light (UV) cured coating line. At this time, the Department considers this matter resolved.
32. On 10/11/00 Notice of Noncompliance AQ-NWR-00-122 was issued to Northwest Pipe Company for filing two required reports late and incomplete. Both reports were subsequently completed. No further enforcement action was taken for these violations.
33. The facility was inspected 08/10/98, 09/16/99, 09/19/01 and was found to be in compliance with permit conditions.
34. On 04/12/01 Notice of Noncompliance AQ-NWR-01-024 was issued to Northwest Pipe Company for 34 violations of condition 11 of the facility's permit. Specifically, the facility incorrectly categorized tape as a coating and included it in their daily VOC calculations. Condition 11 contains the Reasonably Achievable Control Technology (RACT) requirements for the surface coating of miscellaneous metal parts. These violations were referred to the Department's Enforcement Section with a recommendation for civil penalty. A civil penalty was assessed.
35. On April 10, 2002, Notice of Noncompliance AQ-NWR-02-019 was issued to Northwest Pipe Company for failure to file a timely application for an Oregon Title V Operating Permit. An application was subsequently filed, resolving the violation.
36. The permittee was inspected on 09/10/02 and was found to be out of compliance with the coating RACT emission limit standard. A Notice of Noncompliance AQ-NWR-03-005 was issued to Northwest Pipe Company for failure to properly calculate annual Plant Site Emission Limits (PSEL). Specifically, the facility failed to include clean-up solvents (xylene and MEK) in the annual PSEL calculations. As a result, Northwest Pipe Company improved their recordkeeping and tracking system related to this issue. The inspection found the facility was operating in compliance with other requirements.
37. The permittee was inspected on 09/15/04 and was found to be out of compliance with the recordkeeping requirement for visual inspections of fugitive emissions for the facility. A Notice of Noncompliance AQ-NWR-04-062 was issued to Northwest Pipe Company for failure to maintain proper visual emission records. The inspection found the facility was operating in compliance with other requirements.
38. On 07/12/06, Warning letter AQ-NWR-06-064 was issued to Northwest Pipe Company for failure to file a timely application for an Oregon Title V Operating Permit. An application was subsequently received September 1, 2006.
39. On 09/12/06, the Department conducted an inspection and found the facility to be operating out of compliance with recordkeeping permit conditions. On September 20, 2006, Warning Letter AQ-NWR-06-083 was issued to Northwest Pipe Company for the recordkeeping violations. Currently, there are no active enforcement actions on record for Northwest Pipe Company. There are no air quality complaints on record for Northwest Pipe Company.

ADDITIONAL REQUIREMENTS

40. The source is required to submit reports to the Department semi-annually.
41. This source is not subject to federal regulations for New Source Review.
42. This source is not subject to federal regulations for Prevention of Significant Deterioration (PSD).
43. This source is now subject to federal regulations for National Emissions Standards for Hazardous Air Pollutants (NESHAPS) for surface coating of miscellaneous metal parts and products, 40 CFR PART 63 Subpart MMMM, which was promulgated in 2004. The NESHAP applies to each new or existing affected source at that uses 946 liters (250 gallons) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products and that is a major source of emissions of HAP. [40 CFR 63.3881(b)]
 - 43.a. The facility is located at a major source of HAP emissions. Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and a number other industrial, household, and consumer products. [40 CFR 63.3881(a)]
 - 43.b. The permittee predominately performs general use coating operations.
 - 43.c. The affected source consists of all coating operations as defined in 40 CFR 63.3981; all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners, and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation. [40 CFR 63.3882(b)(1-4)]
 - 43.d. For the purposes of the NESHAP, an existing affected source is any affected source that is not a new or reconstructed source. [40 CFR 63.3882(e)]
 - 43.e. The permittee must submit a major modification to the Department within three (3) months of permit issuance outlining and describing which compliance method option will be followed for compliance with this standard.

GENERAL BACKGROUND INFORMATION

44. This source is located in a maintenance area for ozone and carbon monoxide. The area is designated as in attainment for all other pollutants.
45. A Land Use Compatibility Statement was signed by the City of Portland on March 12, 1992.
46. Other permits issued to this source by the Department include a stormwater discharge general permit and a permit for the discharge of non-contact cooling water.
47. The permit is a renewal Oregon Title V Operating Permit. The previous permit was issued on June 12, 2002 and expires March 1, 2007.

PUBLIC NOTICE

48. This permit will be placed on public notice from December 22, 2006 to February 7, 2007, 5 pm. Comments may be submitted until 5 pm February 7, 2007.