LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
(541) 736-1056

REVIEW REPORT

Atkore Plastic Pipe Corporation
dba Ridgeline Pipe Manufacturing
2220 Nugget Way
Eugene, Oregon 97403
Website: https://www.atkore.com/

Permit No. 207488

Source Information:

SIC	3084 – Plastic Pipe Extrusion
NAICS	326122 - Plastic Pipe and Pipe Fitting Manufacturing

Source Categories (LRAPA Title 37, Table 1)	B.74 - All Other Sources not listed herein that LRAPA determines an air quality concern exists
Public Notice Category	I

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Special Conditions	n
Compliance schedule	n

Source test [date(s)]	n
COMS	n
CEMS	n
Ambient monitoring	n

Reporting Requirements:

Annual report (due date)	Feb 15
NSPS Report (due date)	n
Monthly report (due dates)	n

Excess emissions report	y
Other reports	n

Air Programs:

NSPS (list subparts)	n
NESHAP (list subparts)	n
CAM	n
Regional Haze (RH)	n
Synthetic Minor (SM)	n
Part 68 Risk Management	n
Title V	n
ACDP (SIP)	n
New Source Review (NSR)	n
Prevention of Significant Deterioration (PSD)	n
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n

General Background Information

1. Atkore Plastic Pipe Company dba Ridgeline Pipe Manufacturing (or "the facility") is a plastic pipe extrusion facility that manufactures plastic pipe out of imported dry PVC resin, calcium carbonate, recycled PVC, and other minor constituents, at its facility in Eugene, Oregon. The facility produces approximately 70 million pounds of finished product per year.

   The facility receives dry PVC resin, calcium carbonate, and reground PVC, which gets transported pneumatically and mechanically through the various process lines. Whenever product is moved pneumatically, there is a baghouse used to control the emissions before the air is vented to the atmosphere.

   PVC resin is brought in on railcars and is often stored short term in railcars. Calcium carbonate and purchased reground PVC is brought in by truck. These materials are conveyed via vacuum lines to various storage silos. The materials are moved to different silos, and hoppers as needed. Eventually the various components are weighed and mixed to the required product specifications. The mixture is heated via friction to drive off moisture, then the mixture goes into the blender cooler, which is where recycled material would be added if it is going to be. Then the material is moved into either; one of the four (4) Day Hoppers, or one of the five (5) Compound Silos. Finally, the mixtures move to one of the seven (7) feed hoppers for the seven (7) extrusion lines.

   At the end of the extrusion lines, after the pipes are formed and cooled, the pipes are cut to length. The dust from the cutting process is conveyed via vacuum into the recycled material storage silo for later use.

   It is assumed that any volatile constituents in the raw materials are stable while in the solid form and therefore do not volatilize during transportation through the process lines. We also assume that when the final mixture is heated and melted during the extrusion process, any of the volatile components contained in the raw materials get released during the extrusion of the PVC pipe.

2. In 2015 the facility replaced the following baghouses with new units: Systems 13 through 18 baghouses and the silo 1 baghouse. The old units were from the 1970's and 1980's.

   In 2017 the facility replaced one existing extrusion line with a larger line and added another extrusion line. They also replaced the regrind baghouse with a more efficient baghouse at the same time.

3. The air contaminants associated with the operation are primarily particulate matter (PM) and particulate matter less than 10 microns in diameter (PM_{10}) from product loss to atmosphere during material conveyance, and VOC/HAP emissions during the extruding process. The operating schedule for the facility is 8,760 hours/year (24 hours/day, 7 days/week, and 52 weeks/year).

4. The amount of data for VOC/HAP emissions from PVC extrusion is very limited. Vinyl chloride is volatile in monomer form, but very stable when it is in polymer form (aka polyvinyl chloride or PVC). The SDS for the PVC resin from Westlake indicates that along with the vinyl chloride polymer, the vinyl chloride monomer is present at less than 10 ppm. This equates to 0.001% by weight. If we assume that all of the vinyl chloride monomer is emitted during the extrusion process (and no other vinyl chloride from the polymer is released during heating), this equates to about 250-300 lbs/yr, based on recent annual reports.

   The facility uses additives for some of the PVC resin mixtures. The facility's 2020 Air Toxics

Emissions Inventory (ATEI) report shows that some of the additives have volatiles that LRAPA assumes are stable in the powdered form. LRAPA also believes that similar to the PVC resin, these volatiles will be released as gases during the extrusion process when the PVC resin is melted. The volatiles from the PVC resin and additives were not previously taken into account, and the facility's ACDP did not have PSELs for VOCs or HAPs. The PSELs for VOCs/HAPs were added during the 2022 renewal since the emissions were estimated to be over the de minimis levels as defined in LRAPA's title 12.

Reasons for Permit Action

5. The facility replaced a broken cyclone on an existing emission unit (a shaker) with a baghouse. The shaker was not previously included in the list of permitted sources. This permit action adds the baghouse and the shaker to the permit, and updates the emission factor for Reground PVC by changing the BH passes from six (6) to seven (7). This action will not increase the facility's Plant Site Emission Limits (PSELs).

Plant Site Emission Limits (PSELs) Information

6. The PSELs for this facility are in the current permit issued November 28, 2022.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

7. The facility is not subject to PSD for the affected criteria pollutants. The PSELs for the criteria pollutants are below the Significant Emission Rates (SERs) established in LRAPA Title 12.

Continuous Compliance

8. The recordkeeping requirements for this facility are in the current permit issued November 28, 2022.

Reporting

9. The reporting requirements for this facility are in the current permit issued November 28, 2022.

Public Notice

10. This modification qualifies as a Category I public notice. No public notice is required.

CNC/rr
4/14/23

Emission Detail Sheets:

Atkore Plastic Pipe Company dba Ridgeline Pipe

PM/PM10/PM2.5 Emissions

2021

Process Lines	Throughput (lb)	EF_a (lb/lb)	EF_b (Times through a baghouse)
PVC Resin	56,381,600	2.0E-05	3
Calcium Carbonate	12,468,030	2.0E-05	4
Purchased Recycle	2,264,377	2.0E-05	4
Reground PVC	7,111,401	2.0E-05	7
PM emissions (ton/yr)			**2.78**

VOC/HAP Emissions Estimate

Process Lines	Throughput (lb)	EF (lb/lb)
PVC Resin	56,381,600	1.20E-05
Additives	425,670	0.01

VOC/HAP emissions (ton/yr)	**2.47**

Baghouse Throughput Capacities

Baghouse Number	Description	Max Design Flow Rate (lb/hr)	Max Hourly Emissions (lb)
1	Carothers Pulverizer Filter	8,000	0.16
2	Semco Bag Filter	8,000	0.16
3	Semco Bag Filter	8,000	0.16
4	Carter Day Baghouse	8,000	0.16
5	Tortit Filter	3.56	0.00
6	Horizon Silo 2	8,000	0.16
7	Horizon Silo 3/4	8,000	0.16
8	Horizon Silo 5/6	8,000	0.16
9	Horizon Filter DH 1/2	8,000	0.16
10	Horizon Filter DH 3/4	8,000	0.16
11	Carothers Filter	8,000	0.16
12	Carothers Filter	2,500	0.05
13	Carothers Filter	2,500	0.05
14	Carothers Filter	2,500	0.05
15	Carothers Filter	2,500	0.05
16	Carothers Filter	2,500	0.05
17	Carothers Filter	2,500	0.05
18	Carothers Filter	2,500	0.05
19	Horizon Pulverize Filter	8,000	0.16
20	Carothers Bag Filter	2,500	0.05
21	Horizon Bag Filter	6,000	0.12
22	Horizon Bag Filter	4,000	0.08
23	Farr Bin Vent-Top of Old Carb Silo	4,000	0.08
24	Carothers-Top of New Carb Silo	4,000	0.08
25	Carothers Saw Reclaim Filter	8,000	0.16
26	**Shaker Baghouse**	**8,000**	**0.16**
		(lb/hr)	(lb)
	Total	**142,004**	**2.84**

Notes:

Particulates

PM10 emissions are assumed to be 100% PM2.5 based upon DEQ's AQ-EF08 emission factors document (rev 8/1/11)

PM2.5 TRUE-UP and Standard ACDP REQUIRED FOR PM2.5 > 9 tons/year

Based on particle size distribution and baghouse manufacturer warranty, the facility states that the effluent gas from the baghouses will not exceed 0.03 grains per dry standard foot (gr/dscf) of air.

$PM/PM_{10}/PM_{2.5}$ EF = 0.04 lb/ton throughput = 2.0 E-5 lb emission/lb throughput

Annual emissions = $\sum$ (throughput x EFa x EFb)/2000

VOCs/HAPs

PVC Resin: Vinyl Chloride monomer 0.001% by weight on SDS for ATEI report. EF of 1.2E-5 lb/lb (or 0.0012% by weight).

Additives: 0.65% combined VOC/HAP weight on 2020 ATEI report. EF of 0.01 lb/lb (or 1% by weight) to account for potential changes to formulation.

Annual emissions = $\sum$ (throughput x EF)/2000

LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
(541) 736-1056

REVIEW REPORT

Atkore Plastic Pipe Company
dba Ridgeline Pipe Manufacturing
2220 Nugget Way
Eugene, Oregon 97403

Permit No. 207488

Source Information:

SIC	3084 – Plastic Pipe Extrusion
NAICS	326122 - Plastic Pipe and Pipe Fitting Manufacturing

Source Categories (LRAPA Title 37, Table 1)	B.74 - All Other Sources not listed herein that LRAPA determines an air quality concern exists
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	n
Emission credits	n
Special Conditions	n
Compliance schedule	n

Source test [date(s)]	n
COMS	n
CEMS	n
Ambient monitoring	n

Reporting Requirements:

Annual report (due date)	Feb 15
NSPS Report (due date)	n
Monthly report (due dates)	n

Excess emissions report	y
Other reports	n

Air Programs:

NSPS (list subparts)	n
NESHAP (list subparts)	n
CAM	n
Regional Haze (RH)	n
Synthetic Minor (SM)	n
Part 68 Risk Management	n
Title V	n
ACDP (SIP)	n
New Source Review (NSR)	n
Prevention of Significant Deterioration (PSD)	n
Acid Rain	n
Clean Air Mercury Rule (CAMR)	n
TACT	n

Permitting Action

1. The permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on October 8, 2015 and was originally scheduled to expire on October 8, 2020. The existing permit remains valid until the proposed permit is issued because the facility submitted a timely and complete application for renewal.

   The facility indicated in their 2020 renewal application that changes have been made to the permit since the last renewal.

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 a maintenance area for CO and PM_{10}. The area is in attainment for all other criteria pollutants.

General Background Information

4. Atkore Plastic Pipe Company dba Ridgeline Pipe Manufacturing (or "the facility") is a plastic pipe extrusion facility that manufactures plastic pipe out of imported dry PVC resin, calcium carbonate, recycled PVC, and other minor constituents, at its facility in Eugene, Oregon. The facility produces approximately 70 million pounds of finished product per year.

   The facility receives dry PVC resin, calcium carbonate, and reground PVC, which gets transported pneumatically and mechanically through the various process lines. Whenever product is moved pneumatically, there is a baghouse used to control the emissions before the air is vented to the atmosphere.

   PVC resin is brought in on railcars and is often stored short term in railcars. Calcium carbonate and purchased reground PVC is brought in by truck. These materials are conveyed via vacuum lines to various storage silos. The materials are moved to different silos, and hoppers as needed. Eventually the various components are weighed and mixed to the required product specifications. The mixture is heated via friction to drive off moisture, then the mixture goes into the blender cooler, which is where recycled material would be added if it is going to be. Then the material is moved into either; one of the four (4) Day Hoppers, or one of the five (5) Compound Silos. Finally, the mixtures move to one of the seven (7) feed hoppers for the seven (7) extrusion lines.

   At the end of the extrusion lines, after the pipes are formed and cooled, the pipes are cut to length. The dust from the cutting process is conveyed via vacuum into the recycled material storage silo for later use.

   It is assumed that any volatile constituents in the raw materials are stable while in the solid form and therefore do not volatilize during transportation through the process lines. We also assume that when the final mixture is heated and melted during the extrusion process, any of the volatile components contained in the raw materials get released during the extrusion of the PVC pipe.

5. In 2015 the facility replaced the following baghouses with new units: Systems 13 through 18 baghouses and the silo 1 baghouse. The old units were from the 1970's and 1980's.

   In 2017 the facility replaced one existing extrusion line with a larger line and added another extrusion line. They also replaced the regrind baghouse with a more efficient baghouse at the same time.

6. The air contaminants associated with the operation are primarily particulate matter (PM) and particulate matter less than 10 microns in diameter (PM_{10}) from product loss to atmosphere during material conveyance, and VOC/HAP emissions during the extruding process. The operating schedule for the facility is 8,760 hours/year (24 hours/day, 7 days/week, and 52 weeks/year).

7. The amount of data for VOC/HAP emissions from PVC extrusion is very limited. Vinyl chloride is volatile in monomer form, but very stable when it is in polymer form (aka polyvinyl chloride or PVC). The SDS for the PVC resin from Westlake indicates that along with the vinyl chloride polymer, the vinyl chloride monomer is present at less than 10 ppm. This equates to 0.001% by weight. If we assume that all of the vinyl chloride monomer is emitted during the extrusion process (and no other vinyl chloride from the polymer is released during heating), this equates to about 250-300 lbs/yr, based on recent annual reports.

   The facility uses additives for some of the PVC resin mixtures. The facility's 2020 Air Toxics Emissions Inventory (ATEI) report shows that some of the additives have volatiles that LRAPA assumes are stable in the powdered form. LRAPA also believes that similar to the PVC resin, these volatiles will be released as gases during the extrusion process when the PVC resin is melted. The volatiles from the PVC resin and additives were not previously taken into account, and the facility's ACDP did not have PSELs for VOCs or HAPs. The PSELs for VOCs/HAPs were added during the 2022 renewal since the emissions were estimated to be over the de minimis levels as defined in LRAPA's title 12.

Reasons for Permit Issuance

8. The facility operates a process listed in Table 1, Part B of LRAPA title 37, and is therefore required to obtain a permit. The primary reason for the permit issuance is to renew the expired permit. During the previous permit renewal, the permitted activity was reclassified from B.74 ("unlisted source of concern") to B.75 ("unlisted source which would have actual emissions, if the source were to operate uncontrolled, of 5 or more tons a year of PM_{10}") in Table 1 of LRAPA title 37 to more accurately reflect the facility activity.

   There are two fee categories for Simple permits: "High" and "Low". For facilities permitted under Simple ACDPs, the annual permit fee is based on the actual emissions of the previous year. To qualify for the low fee, a facility must have actual emissions of less than five (5) tons/year of PM_{10} in a PM_{10} nonattainment or maintenance area or $PM_{2.5}$ in a $PM_{2.5}$ nonattainment or maintenance area, and less than 10 tons/year for each criteria pollutant. See LRAPA 37-0064(2)(a)(B).

Emission Unit Description

9. The facility controls particulate matter emissions using twenty-five (25) baghouses. Other specific emission sources include:

EU ID	Emission Unit (EU)	Control Device
EU1	2 Calcium Carbonate Silos	BH23, BH24
EU2	Hoppers above blender	BH2, BH3, BH21, BH22
EU3	Four Day Hoppers	BH9, BH10
EU4	Five Compound Silos	BH6, BH7, BH8
EU5	Seven Feed Hoppers	BH12, BH13, BH14, BH15, BH16, BH17, BH18
EU6	Regrind Bins	BH11
EU7	Recycle Feed Hopper	BH1
EU8	Recycle Silo	BH19
EU9	Recycle Hopper above blender	BH20
EU10	Saw Reclaim	BH25
EU11	Seven Pipe Extrusion Lines	NA

Performance Test Results

10. A test was performed on February 28, 2000 by Columbia River Carbonates (CRC) to determine the particle size distribution of the plastic shaving materials produced by the cutting process of PVC pipe and the affect these materials will have on emissions. The test results indicated that the smallest particles generated by the cutting process are approximately 10 microns in diameter (PM_{10}). Since the vacuum system and baghouses will filter out particles greater than one (1) micron in diameter, the test estimated that close to 100% of the particles generated and collected will be removed.

Plant Site Emission Limits (PSELs) Information

11.

Annual Plant Site Emission Limits (PSELs)
(tons per year)

Pollutant	Plant Site Emission Limit (tons/year)
PM	24
PM_{10}	14
$PM_{2.5}$	9
VOC	39
Individual HAP	9
Combined HAPs	24

a. The proposed PSELs for all pollutants are equal to the Generic PSEL in accordance with LRAPA 37-0064(3)(b) and the netting basis is zero in accordance with 42-0040(2).

b. PSELs for CO, NO_X, SO_2, and GHGs are not included in this permit since emissions of these pollutants are less than the respective de minimis emission rates.

c. The PSEL is a federally enforceable limit on the potential to emit.

d. Recordkeeping of the parameters listed in Conditions 13 through 17 of the permit and Item 23 of this review report will be used to ensure compliance with the PSELs.

12. The attachment to this report contains estimations of emissions and details about the emission points.

In previous years, the facility emitted a few hundred pounds of VOC per year from ink jet printers for pipe marking. Recent SDSs for the inks used, show no VOCs. However, the facility's 2020 ATEI report indicates there may be VOC and HAP emissions from the PVC resin and additives during the extrusion process. PSELs for VOCs and HAPs were added to the permit because the emission estimations are over the de minimis levels defined in LRAPA title 12, which requires the addition of Generic PSELs for VOCs and HAPs in accordance with LRAPA title 42.

The emission estimates, and the methods of demonstrating compliance have been updated for particulate emissions. The particulate emissions estimates are based upon a DEQ (AQ-EF02) emission factor of 0.04 lb/ton of throughput (or 2.0E-5 lb/lb throughput), which is the same factor used for baghouse controlled sanderdust. The use of the 2.0E-5 lb/lb emission factor is appropriate because the particle size distribution of PVC resin is much like sanderdust. The previously used emission estimation method of 0.03 gr/dscf, rated air flow (scf), and hours of operation has been removed, and updated to 2.0E-5 lb/lb of throughput of material.

The new method of determining particulate emissions, established in the 2022 renewal, is based on the process throughput and the number of times that process goes through a baghouse. There are four (4) main components to the PVC pipe production: PVC resin, calcium carbonate, reground PVC, and purchased reground PVC. The yearly throughput of each is multiplied by the emission factor (EF) and the number of baghouses that component passes through. Then those four amounts are summed to get the yearly PM emissions.

No monitoring is required to ensure compliance with the PM/PM_{10}/$PM_{2.5}$ PSELs other than keeping monthly records of material throughput and baghouse maintenance when performed.

The VOC and HAP emission factors were taken from information provided on the facility's 2020 ATEI report. This VOC/HAP information is not readily available on the data sheets (SDS, EDS, CPDS, etc.) because of proprietary formulation information, and is therefore difficult to track changes. LRAPA created conservative EFs to provide a way to track compliance with the PSELs without requiring full material balance reporting. Additives that do not contain VOCs and/or HAPs do not need to be included in the VOC/HAP calculations.

The individual HAP compliance demonstration conservatively assumes the maximum individual HAP amount is equal to the combined HAPs amount.

Baseline Emission Rate (BER)

13. The facility existed in the 1978 baseline year but has chosen not to retain the baseline by opting for a Simple ACDP.

Other Emission Limits

14. LRAPA's process weight rule specifies limits on the emissions of particulate matter for specific processes as a function of the amount of material processed [LRAPA 32-045(A)]. Using the cumulative maximum hourly design rate for the 25 baghouses of 134,004 pounds per hour, the table in title 32 (LRAPA 32-8010) shows the limit corresponding to this process weight is approximately 47.3 pounds per hour. Since the maximum hourly emissions have been estimated to be as much as 2.68 pounds per hour, compliance with the annual PSEL will ensure compliance with the process weight rule.

    The permit includes general visible emissions limits for the facility and general grain loading limits for the sources.

Hazardous Air Pollutants (HAPs) and Toxic Air Contaminants (TACs)

15. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and is therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants (TACs).

    In 2016 and again in 2020, LRAPA required the reporting of approximately 600 toxic air contaminants. LRAPA regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in rule. All 187 Federally listed hazardous air pollutants (HAPs) are on the list of approximately 600 toxic air contaminants. The hazardous air pollutants and toxic air contaminants listed below (see table in item 16) were reported by the source on their 2020 Air Toxic Emission Inventory (ATEI) and were verified by LRAPA.

When the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce their risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially on the ATEI.

16. A major source for hazardous air pollutants (HAP) is a facility that has the potential to emit 10 or more tons per year of any single HAP, or 25 or more tons per year of combined HAPs. This source is not a major source of hazardous air pollutants.

    The projected HAP emissions from the facility are estimated to be over one ton per year. The facility was formerly a source of Methyl Ethyl Ketone (MEK). However, the source of these emissions was the ink-jet printers and they have been removed from the facility. Likewise, MEK has been de-listed as a HAP. An SDS (Safety Data Sheet) for currently used ink is on file at LRAPA. The facility now uses ink that contains neither VOCs nor HAPs.

    The projected maximum potential HAP/TAC emissions from the facility are shown in the following table:

Pollutant	HAP	Pounds/year
1,3 Butadiene	**Y**	2,341.2
Vinyl Chloride	**Y**	563.8
Methyl Methacrylate	**Y**	212.8
Acrylic Acid	**Y**	212.8
Acetone	**N**	212.8
Silica (respirable)	**N**	39.5
Propylene glycol monomethyl ether	**N**	4.4
	Total HAP (lb/yr) Total HAP (ton/yr)	3,312 1.66

Typically Achievable Control Technology (TACT)

17. LRAPA 32-008 requires an existing emission unit at a facility to meet TACT if the emission unit has emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutant or five (5) tons per year of particulate, the emission unit is not subject to the emissions standards under LRAPA title 32, title 33, title 39, or title 46 for the pollutants emitted, and the source is required to have a permit. The emissions at this facility are subject to the grain loading standards in title 32 and are therefore not required to meet TACT. However, the baghouse control devices would be considered TACT for this type of facility.

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

18. Because the proposed PSELs for all regulated pollutants are below the Significant Emission Rates (SERs), the facility is not subject to LRAPA's New Source Review (NSR) requirements in LRAPA title 38, for PM_{10} nor the Prevention of Significant Deterioration (PSD) requirements for SO_X, NOx, CO, and VOC.

NESHAP/MACT Applicability

19. There are no sources at this facility for which NESHAP/MACT (National Emissions Standards for Hazardous Air Pollutants / Maximum Achievable Control Technology) standards have been promulgated.

NSPS Applicability

20. There are no sources at this facility for which New Source Performance Standards (NSPS) standards have been promulgated.

Compliance History

21. The facility inspection and compliance history is listed in the table below.

Type of Inspection	Date	Results
Full Compliance Evaluation	05/20/1996	In compliance
Full Compliance Evaluation	03/14/1997	In compliance
Full Compliance Evaluation	01/26/1998	In compliance
Full Compliance Evaluation	12/14/2004	In compliance
Response to Complaint	11/21/2017	In compliance – Procedural Requirements
Maintenance of Compliance	07/17/2019	In compliance
Response to Visible Emissions	10/16/2020	NON 3825, NCP 20-3825, SFO 20-3825

22. On October 16, 2020, LRAPA observed a significant amount of particulate matter emanating from the baghouse filter area. On November 30, 2020, LRAPA issued a Notice of Non-Compliance (NON 3825) to Atkore Plastic Pipe Company, for the October 16, 2020 failure to operate all air contaminant generating processes and all contaminant control equipment at full efficiency and effectiveness (failed to assure and affirm that baghouse filter cartridges were installed and operating correctly).

    On January 14, 2021, LRAPA issued a Notice of Civil Penalty (NCP 20-3825) in the amount of $2,200. The facility requested a reduction and the fee was reduced to $1,400.

    On March 11, 2021 LRAPA issued a Stipulated Final Order (SFO 20-3825) in the amount of $1,400. The full amount was paid on March 22, 2021, and the action was closed.

Record Keeping and Reporting

23. A record of the following data must be maintained for a period of five (5) years at the plant site and must be available for inspection by authorized representatives of LRAPA:

Facility-Wide Activity	Parameter	Units	Minimum Recording Frequency
Imported Dry PVC resin	Material Usage	Pounds	Monthly
Calcium Carbonate	Material Usage	Pounds	Monthly
Wax	Material Usage	Pounds	Monthly
Recycled Material	Material Usage	Pounds	Monthly
Additives (such as Impact Modifiers)	Material Usage	Pounds	Monthly
Ink and Flush	Material Usage	Pounds	Monthly
Baghouse maintenance performed	Occurrence	NA	Occurrence

24. The facility is required to submit an annual report by **February 15th** each year to include material usage and baghouse maintenance performed as well as any information as required per the information identified in item 23 above and Condition 19 of the permit.

Outdoor Burning

25. Outdoor burning is prohibited in accordance with the requirements of LRAPA 47-020.

Additional Limitations

26. The facility is subject to the visible emissions standards in LRAPA 32-010(3), the particulate grain-loading standard in LRAPA 32-015(2)(b)(B), and the highest and best requirement of LRAPA 32-005. Operation of well-maintained baghouse filters should assure compliance with the grain-loading and visible emissions limits.

Public Notice

27. The draft permit was on public notice from October 28, 2022 to November 27, 2022. Pursuant to LRAPA 37-0064(4), issuance of a renewed Simple ACDP requires public notice as a Category II permit action in accordance with LRAPA 31-0030(3)(b), which requires LRAPA to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments.

    No comments were received during the public comment period.

CNC/rr
11/28/22

Emission Detail Sheets:

Atkore Plastic Pipe Company dba Ridgeline Pipe

PM/PM10/PM2.5 Emissions

2021

Process Lines	Throughput (lb)	EF_a (lb/lb)	EF_b (Times through a baghouse)
PVC Resin	56,381,600	2.0E-05	3
Calcium Carbonate	12,468,030	2.0E-05	4
Purchased Recycle	2,264,377	2.0E-05	4
Reground PVC	7,111,401	2.0E-05	6
	PM emissions (ton/yr)		**2.71**

VOC/HAP Emissions Estimate

Process Lines	Throughput (lb)	EF (lb/lb)
PVC Resin	56,381,600	1.20E-05
Additives	425,670	0.01
	VOC/HAP emissions (ton/yr)	**2.47**

Baghouse Throughput Capacities

Baghouse Number	Description	Max Design Flow Rate (lb/hr)	Max Hourly Emissions (lb)
1	Carothers Pulverizer Filter	8,000	0.16
2	Semco Bag Filter	8,000	0.16
3	Semco Bag Filter	8,000	0.16
4	Carter Day Baghouse	8,000	0.16
5	Tortit Filter	3.56	0.00
6	Horizon Silo 2	8,000	0.16
7	Horizon Silo 3/4	8,000	0.16
8	Horizon Silo 5/6	8,000	0.16
9	Horizon Filter DH 1/2	8,000	0.16
10	Horizon Filter DH 3/4	8,000	0.16
11	Carothers Filter	8,000	0.16
12	Carothers Filter	2,500	0.05
13	Carothers Filter	2,500	0.05
14	Carothers Filter	2,500	0.05
15	Carothers Filter	2,500	0.05
16	Carothers Filter	2,500	0.05
17	Carothers Filter	2,500	0.05
18	Carothers Filter	2,500	0.05
19	Horizon Pulverize Filter	8,000	0.16
20	Carothers Bag Filter	2,500	0.05
21	Horizon Bag Filter	6,000	0.12
22	Horizon Bag Filter	4,000	0.08
23	Farr Bin Vent-Top of Old Carb Silo	4,000	0.08
24	Carothers-Top of New Carb Silo	4,000	0.08
25	Carothers Saw Reclaim Filter	8,000	0.16
		(lb/hr)	(lb)
	Total	**134,004**	**2.68**

Notes:

Particulates

PM10 emissions are assumed to be 100% PM2.5 based upon DEQ's AQ-EF08 emission factors document (rev 8/1/11)

PM2.5 TRUE-UP and Standard ACDP REQUIRED FOR PM2.5 > 9 tons/year

Based on particle size distribution and baghouse manufacturer warranty, the facility states that the effluent gas from the baghouses will not exceed 0.03 grains per dry standard foot (gr/dscf) of air.

$PM/PM_{10}/PM_{2.5}$ EF = 0.04 lb/ton throughput = 2.0 E-5 lb emission/lb throughput

Annual emissions = ∑ (throughput x EFa x EFb)/2000

VOCs/HAPs

PVC Resin: Vinyl Chloride monomer 0.001% by weight on SDS for ATEI report. EF of 1.2E-5 lb/lb (or 0.0012% by weight).

Additives: 0.65% combined VOC/HAP weight on 2020 ATEI report. EF of 0.01 lb/lb (or 1% by weight) to account for potential changes to formulation.

Annual emissions = ∑ (throughput x EF)/2000