LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
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REVIEW REPORT

Kosan Crisplant Missouri Inc.
85507 Highway 99 South
Goshen, Oregon 97426
http://www.kosancrisplant.com/

Permit No. 206463

Source Information:

SIC	4925 – Manufactured Gas Distribution	Source Categories (LRAPA Title 37, Table 1)	B. 69 – Surface coating operations > 250 gallons per year
NAICS	221210 – Manufactured Gas Distribution	Public Notice Category	Category II

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	NA	Source test [date(s)]	NA
Emission credits	NA	COMS	NA
Special Conditions	NA	CEMS	NA
Compliance schedule	NA	Ambient monitoring	NA

Reporting Requirements:

Annual report (due date)	February 15	Excess emissions report	Y
NSPS Report (due date)	NA	Other reports	NA
Monthly report (due dates)	NA		

Air Programs:

NSPS (list subparts)	NA
NESHAP (list subparts)	NA
CAM	NA
Regional Haze (RH)	NA
Synthetic Minor (SM)	NA
SM-80	NA
Part 68 Risk Management	NA
Title V	NA
ACDP (SIP)	NA
Major HAP source	NA
Federal major source	NA
New Source Review (NSR)	NA
Prevention of Significant Deterioration (PSD)	NA
Acid Rain	NA
Clean Air Mercury Rule (CAMR)	NA
TACT	NA
>20 Megawatts	NA

Permittee Identification

1. Kosan Crisplant Missouri Inc. ("the facility") is a propane cylinder exchange refurbishing center at 85507 Highway 99 South in Goshen, Oregon.

General Background Information

2. The facility inspects, cleans, paints, fills, and leak checks propane cylinders. The cylinders arrive at the facility by truck and are unloaded and placed in a staging area. The cylinders are moved to the preparation area where any labels or sleeves are removed from the surface of the cylinder, then the cylinders are conveyed to the washing process station. Once dried, the cylinders are painted in a spray booth (SB-1) and left to dry in a warm room. The cylinders are then moved to the filling area (F-1) where they are filled with propane, via a filling gun. The facility has the capacity to service up to 20,000 cylinders per day. The air contaminant emissions from this operation are primarily VOC.

Reasons for Permit Issuance

3. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which was issued on May 30, 2014 and was scheduled to expire on May 30, 2019. The facility indicated in their 2018 renewal application that they were requesting a renewal of an existing permit without changes. Because the actual emissions from calendar year 2020 were less than 10 tons/year for VOCs, the permit action is considered a Simple "low" ACDP renewal under LRAPA 37-0064(2)(a).

Attainment Status

4. This facility is located in an attainment area for all pollutants.

Permitting History

5. LRAPA has reviewed and issued the following permitting actions to this facility:

Date(s) Approved/Valid	Permit Action Type	Description
11/27/2013-11/27/2023	Basic ACDP	Initial air permit
05/30/2014-05/30/2019	Simple ACDP	Source moved to Simple ACDP
03/30/2020	Administrative Amendment	Company and name change from "Pinnacle Propane Express" to "Kosan Crisplant Missouri Inc."

Compliance History

6. LRAPA has not initiated any enforcement actions against this facility.

Source Testing

7. The facility is not required to conduct source testing at this time. The use of Safety Data Sheet (SDS) or Certified Product Data Sheet (CPDS) and material usage will be used to determine the facility's VOC emissions.

Emission Unit Description

8. The emission units regulated by this permit are the following:

Emission Unit	EU ID	Pollution Control Device
Spray Booth	SB-1	Dry filter
Filling of Propane Cylinders	F-1	None

Plant Site Emission Limits (PSELs)

9. The emissions for the facility are based on the generic PSEL level of 39 tons per year of VOC, 9 tons per year of any single HAP and 24 tons per year for combined HAPs according to LRAPA Title 42-0040.

Annual PSEL

Pollutant	Plant Site Emission Limit (tons/year)
VOC	39
Individual HAP	9
Aggregate HAP	24

Baseline Emission Rate (BER) and Significant Emission Rate (SER) Comparison

10. The BER has been set at zero (0) tons per year for all pollutants since this source was not in operation during the 1978 baseline year and because it has not obtained a Standard ACDP. Additionally, the BER for GHG was not established because the facility did not utilize any fuel burning sources during the GHG baseline period (2000-2010).

Hazardous air pollutants/Toxic Air Contaminants

11. 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.

    LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in rule. All 187 hazardous air pollutants are on the list of approximately 600 toxic air contaminants. The hazardous air pollutants and toxic air contaminants listed below were reported by the source in 2016 and verified by LRAPA. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.

12. This source is not a major source of hazardous air pollutants (HAPs). The HAP emissions detail is provided at the end of this report. Provided below is a summary of the HAP and toxic air contaminant (TAC) actual emission estimates from the 2016 calendar year. The combined total for all federal HAPs in 2020 was 0.45 tons/year.

Chemical Name	HAP	TAC	2016 Emissions (lbs/year)
Ammonia	N	Y	0.02
2-Butanol	N	Y	2.00
Cumene	Y	Y	0.04
Ethylene glycol monobutyl ether	Y	Y	5.35
Naphthalene	Y	Y	0.02
Triethylamine	Y	Y	13.9
Trimethylbenzenes	N	Y	0.32
1,2,3-Trimethylbenzene	N	Y	0.15
Vinyl acetate	Y	Y	0.34
Dipropylene glycol monobutyl ether	N	Y	195
Carbon black	N	Y	19.5
2-Butoxy ethanol	Y	Y	363
Aqueous ammonia	N	Y	3.03
Ethyl benzene	Y	Y	0.02
Total Federal HAP (tons/year)			0.19

Toxics Release Inventory

13. The Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which LRAPA has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:

    - Cancer or other chronic human health effects;
    - Significant adverse acute human health effects; or
    - Significant adverse environmental effects.

    There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process, or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.

    This facility did not report to the TRI.

Emission Limits

14. The spray booth (SB-1) is subject to the visible emission limitations under LRAPA 32-010(3). This emission unit may not have visible emissions equal to or greater than 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour.

15. SB-1 is subject to particulate matter emission limitations under LRAPA 32-015(2)(b). For sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot.

16. SB-1 is subject to the process weight rate emission limitation under LRAPA 32-045. Particulate matter emissions in any one hour may not exceed the amount shown in LRAPA 32-8010 for the process weight allocated to the process.

Typically Achievable Control Technology (TACT)

17. LRAPA Title 32-008 requires that an existing emission unit at a source to meet TACT if the emissions unit meets the following criteria: the emissions of criteria pollutants are greater than five (5) tons per year of particulate or greater than ten (10) tons per year of any gaseous pollutant, the emissions unit is not subject to the emissions standards under LRAPA Title 30, Title 32, Title 33, Title 38, Title 39, or Title 46 for the pollutants emitted, and the source is required to have a permit. The facility does not currently emit more than 10 tons of VOC per year and is not required to meet TACT for VOC. The facility reported 3.3 tons of VOC emissions in 2020. While the facility is not required to meet TACT at this time, LRAPA has determined that the following work practices would likely meet TACT: (1) applying coatings in a spray booth fitted with filters demonstrated to achieve at least 98% capture of paint overspray, (2) the use of high volume, low pressure (HVLP) spray guns, electrostatic application, airless spray guns, or air-assisted airless spray guns or equivalent technology, (3) the cleaning of spray guns with cleaning solvents within a containment system, and (4) ensuring and certifying that all personnel, including contract personnel, who spray apply surface coatings, are trained in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment.

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

18. The facility is not a federal major source because it is not a listed source and the proposed PSELs for all regulated pollutants are below the applicable federal major source threshold of 250 TPY. The PSEL of 39 tons VOC per year is below the 40 ton per year significant emission rate (SER) as established in LRAPA Title 12. Recent actual VOC emissions from the 2020 calendar year are 3.3 tons/year.

New Source Performance Standards (NSPS)

19. There are no sources at this facility for which NSPS have been promulgated or are applicable.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

20. LRAPA reviewed the following NESHAPs to determine their applicability to this facility:

    20.a. 40 CFR Part 63, Subpart MMMM - National Emission Standards for Hazardous Air Pollutants for Surface Coating of miscellaneous Metal Parts and Products is not applicable to the facility because the facility is not a major source of HAPs.

    20.b. 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources is not applicable to the facility because the facility does not use methylene chloride for paint stripping, it is not an autobody refinishing operation, and no target HAPs are reported as being used.

    20.c. 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants: Nine Metal Fabrication and Finishing Source Categories is not applicable to the source because the facility does not engage in the operations stated in 40 CFR 63.11514(a).

Recordkeeping

21. The facility is required to keep and maintain a record of the following information for a period of five (5) years:

Activity	Parameter	Units	Minimum Recording Frequency
VOC/HAP-containing Material Usage	Material Usage	Gallons	Monthly
VOC/HAP-containing Material Usage	Density of Material	Pounds/gallon	Maintain current information at all times
VOC/HAP-containing Material Usage	VOC/HAP content	% by weight	Maintain current information at all times
Spray booth filter particulate matter control efficiency	Control efficiency	%	Maintain documentation from filter manufacturer
Spray booth filter replacement	Occurrence	NA	Upon replacement
Spray booth training	Training Logs/Certifications	NA	Maintain documentation of training for spray coating personnel
Spray Booth inspections and maintenance performed	Occurrence	NA	Per occurrence
Complaints from the public	Log complaint and resolution	NA	Upon receipt
Upset log of all planned and unplanned excess emissions	See Condition G15 in permit	NA	Per occurrence

21.a. VOC/HAP-containing materials include, but are not limited to, coatings, lacquers, thinners, stains, topcoats, solvents, adhesives, cleaning, and wash-off materials.

21.b. The density and VOC/HAP content information must be supplied from CPDS or SDS provided by the manufacturer/supplier of the VOC/HAP-containing material.

Reporting Requirements

22. The facility is required to submit an annual report by **February 15th** each year to include the VOC and HAP emission estimation information identified in Condition 14 of the permit.

Public Notice

23. The draft permit was on public notice from April 19, 2021 to May 18, 2021. No written comments were submitted during the 30-day comment period.

KE/CMW
05/19/2021

VOC and HAP Emissions Calculations

Product	2016 Usage (gal/yr)	2020 Usage (gal/yr)	PTE Usage[1] (gal/yr)
Driquik Acrylic Enamel 7040 Gray WB	205.7	0	3000
Watson Standard 3853M	241.5	1183	3000
Sheboygan RAL 7040 Gray Aqua Enamel	9.5	0	153.9

[1]NOTE: Potential to Emit (PTE) usage was determined from the 2016 CAO EI submitted to LRAPA for the Driquik and Watson products, and the highest reported usage for the Sheboygan product based off the 2014 Annual Report.

Product	VOC Content (%)	Density (lb/gal)	2016 VOC Emissions (tons/yr)	2020 VOC Emissions (tons/yr)	PTE VOC Emissions (tons/yr)
Driquik Acrylic Enamel 7040 Gray WB	61.41%	9.49	0.60	0	8.7
Watson Standard 3853M	62.52%	8.9	0.67	3.3	8.3
Sheboygan RAL 7040 Gray Aqua Enamel	58.66%	9.717	0.03	0	0.44
	Total VOC Emissions (tons/yr)		1.3	3.3	17.5

Chemical Name	HAP	TAC	Driquik Acrylic Enamel (% by wt.)	Watson Standard 3853M (% by wt.)	Sheboygan Gray Aqua Enamel (% by wt.)	2016 Emissions (lbs/yr)	2020 Emissions (lbs/yr)	PTE Emissions (lbs/yr)
Ammonia	N	Y			0.022%	0.02	0	0.33
2-Butanol	N	Y			2.17%	2.00	0	32.5
Cumene	Y	Y		0.002%		0.04	0.21	0.53
Ethylene glycol monobutyl ether	Y	Y			5.8%	5.35	0.00	86.7
Naphthalene	Y	Y		0.001%		0.02	0.11	0.27
Triethylamine	Y	Y		0.649%		13.9	68.33	173
Trimethylbenzenes	N	Y		0.015%		0.32	1.58	4.01
1,2,3-Trimethylbenzene	N	Y		0.007%		0.15	0.74	1.87
Vinyl acetate	Y	Y		0.016%		0.34	1.68	4.27
Dipropylene glycol monobutyl ether	N	Y	10.0%			195	0	2847
Carbon black	N	Y	1.0%			19.5	0	285
2-Butoxy ethanol	Y	Y	10.0%	7.814%		363	823	4933
Aqueous ammonia	N	Y		0.141%		3.03	14.8	37.6
Ethyl benzene	Y	Y		0.001%		0.02	0.11	0.27
				Total TAC and HAP (lbs/yr)		603	910	8407
				Total TAC and HAP (tons/yr)		0.30	0.46	4.20
				Federal HAP (lbs/yr)		383	893	5199
				Federal HAP (tons/yr)		0.19	0.45	2.60