

## ***Removal of Production Limits, Recordkeeping and Other Requirements Through Air Permit Reclassifications***

**CLIENT: Lumber Manufacturer**

**PROJECT: Air Permit Reclassification & Removal of Production Limits**

This facility consists of a sawmill, woodworking operations, and steam heated kilns, with steam provided by wood-fired boilers. At the insistence of the air quality agency, the facility was initially classified as a synthetic minor source, with limitations on production.

Several requests by the company to be reclassified to a small source had been denied over the years by the state agency. When LEAF was retained by the company, we conducted a review of the air quality agency's files and determined that their staff had been using incorrect emission factors as well as incorrect interpretation of operation. LEAF prepared a formal request for reclassification to a small source with removal of all production limitations. The new air permit for the facility is for a small source and contains no production limitations, no recordkeeping requirements, and no reporting requirements on production or emissions.

**CLIENT: Lumber Manufacturer**

**PROJECT: Removal of Production Limits by Air Permit Reclassification**

This facility consists of a sawmill, woodworking operations and steam heated kilns, with steam provided by wood-fired boilers. While conducting a site visit for stormwater related work, LEAF engineers noticed that the woodworking operations were not consistent with the air permit classification. Specifically, the air quality agency had incorrectly classified woodworking emissions, thereby requiring the facility to be a synthetic minor source. LEAF prepared an air permit application to have the plant reclassified to a small source. As part of the reclassification, recordkeeping, reporting, and production limits were also removed from the permit at LEAF's request.

**CLIENT: Plastic Parts Manufacturing & Coating**

**PROJECT: Removal of Production Limits and Air Permit Reclassification**

This company manufactures plastic components for numerous different customers. Many of the plastic components are then painted, and as a result the facility had been classified as a Title V source due to potential VOC emissions. LEAF conducted an evaluation of the facility's manufacturing and emissions over a several year period, evaluated alternative coatings and solvents, and determined that the facility could be reclassified to a small source with no limitations on production. LEAF prepared the application to modify the air permit and the facility was issued a revised air permit as a small source, thereby saving the client substantial annual fees, removing it from MACT applicability, reducing recordkeeping and compliance certifications, while having no adverse affects on the client's business or future production.

**CLIENT: Furniture Components Manufacturer**

**PROJECT: Reclassification from Title V to Small Source**

This facility had been classified as a Title V source and was referred to LEAF by one of our existing clients. The new client requested help in completion of its Title V application, which it had already begun, and the plant needed to include an additional spray booth in its permit. Our engineers reviewed the facility operations and determined that the plant could be reclassified to a small source without restricting current or future production. We provided the client with a series of recommendations for operation as a small source, and with the client's approval, prepared an application for an air permit for a small source. The application package included complete emissions assessment, regulatory assessment, including an NSPS source review, and monitoring and reporting requirements. The facility received a permit as a small source, which reduced permit fees by more than \$7,000 annually, and removed the need to comply with the furniture MACT. In addition, the frequency of emission inventories was reduced from annual to every third year.

**CLIENT: Lumber Mills**

**PROJECT: Removal of Production Limits and Reclassify to Small Source**

For several new lumber mill clients, LEAF was requested to conduct emission inventories. While reviewing their air permits as a routine part of the project, we determined that these facilities had been incorrectly classified as synthetic minor sources. LEAF prepared requests to the state agencies involved and the facilities were reclassified from synthetic minor to small, resulting in savings of more than \$1,000 per year in permit fees, removal of production limits, and a reduction in permit conditions, monitoring, recordkeeping and reporting.

**CLIENT: Pharmaceutical Manufacturer**

**PROJECT: Removal of Synthetic Minor Restrictions**

LEAF was requested to conduct an emission inventory for this client's pharmaceutical facility, which had been classified as a synthetic minor. An evaluation by our engineers showed that with the change in solvent, the facility could be reclassified as a small source without restricting production. LEAF prepared a request to the state agency to modify the permit, based on detailed emission calculations, and the plant was reclassified as a small source, with associated permit fee and manpower savings.

**CLIENT: Industrial Equipment Manufacturer**

**PROJECT: HAP Elimination and Reclassification from Title V**

LEAF provided recommendations to this client to substitute solvent usage to eliminate MACT applicability, to reduce personnel exposure to hazardous chemicals, and to qualify as a small source, further reducing regulatory compliance requirements. The plant made a decision to replace all HAP solvent cleaning usage, and LEAF worked with the client to prepare a submittal to the state agency for reclassification from Title V to small category. In addition to reducing near term compliance manpower requirements, the plant was not subject to future MACT regulations that could have had significant cost impacts on the facility.