

BASIC
AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Griffith Rubber Mills
P.O. Box 2783
Eugene, OR 97402

INFORMATION RELIED UPON:

Application No.: 62591, 62584
Date Received: 02/21/17, 03/08/17

PLANT SITE LOCATION:

2631 West 5th Avenue
Eugene, OR 97402

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: 03/07/17

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Max Hough for Merlyn L. Hough May 9, 2017
Merlyn L. Hough, Director Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 8	Source not elsewhere classified with actual emissions of more than 1 ton/year of VOC and/or HAP.	3061

1.0 STATEMENT OF PURPOSE

- 1.1 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible emission limits** Emissions from any air contaminant source must not equal or exceed 20% opacity as a six-minute block average. "Opacity" means the degree to which an emission reduces transmission of light and obscures the view of an object in the background.
- 2.2 Particulate Matter Weight Standards** Emissions from any air contaminant source must not exceed 0.14 grain per dry standard cubic foot of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon dioxide.
- 2.3 Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.4 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.
- 2.5 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

3.0 RECORDKEEPING AND REPORTING REQUIREMENTS

- 3.1 Records** The permittee must maintain records of the information identified in Condition 3.2 for at least 5 years from the date of the record.
- 3.2 Reports** The permittee is required to report to LRAPA by **February 15th** of each year the following:
- a) amount of natural gas (cubic feet) burned in the boiler(s) during the previous calendar year, and
 - b) The coating and solvent usage amounts (pounds) by type (e.g., "Chemlok 252x", "Thinner 225", etc.).
- 3.3 Permit Renewal** An application to renew the permit is due 30 days prior to the expiration date.
- 3.4 Construction or Modification Notices** The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to, or emissions are significantly changed or increased.
- 3.5 Notice of Change of Ownership or Company Name** The permittee must promptly notify LRAPA of any change of mailing address, company name, or plant ownership. The permit will expire 60 days after a change in the legal entity owning/operating the facility unless application, with appropriate fees, is made to transfer the permit to the new entity.
- 3.6 Where to Send Reports and Notices** The reports and notices, with the permit number prominently displayed, must be sent to the LRAPA office identified on the cover page of the permit.

4.0 FEES

- 4.1 Fees** The Annual Fee specified in LRAPA Section 37-0020, Table 2, Part 2 for a Basic ACDP is due by **December 1st** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

5.0 GENERAL CONDITIONS

- 5.1 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 5.2 Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47.
- 5.3 Asbestos** All activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance must be performed by persons certified for asbestos abatement projects. Accumulation of asbestos containing material is prohibited. If you have asbestos questions, contact the LRAPA office identified below.
- 5.4 Permit Availability** The permittee must have a copy of the permit available at all times.
- 5.5 LRAPA Inspections** The permittee must allow the LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.
- 5.6 Legal Disclaimers** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 5.7 Permit Revocation** This permit is subject to revocation for cause as provided in LRAPA Section 37-0082.
- 5.8 LRAPA Contact** Call the LRAPA office in Springfield at (541) 736-1056.

Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Griffith Rubber Mills
 2631 West 5th Avenue
 Eugene, OR 97402
<http://www.griffithrubber.com/>

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
February 15 th	N/A	N/A	N/A	N/A	Category I

1. The proposed permit is a new permit for an existing facility. The facility performs rubber extrusion, rubber splicing, rubber molding, and rubber die cutting at its 2631 West 5th Avenue location in Springfield. A 4.2 MMBtu/hr natural gas-fired boiler supplies heat and steam to the process. Other emission sources are from adhesive and solvent usage.
2. A review of the Eugene Toxics Right to Know (ETRTK) database by LRAPA staff revealed the facility reported actual emissions of approximately one (1) ton per year of air toxics for 2015. Their previous ETRTK reporting year was 2009.
3. This facility qualifies for a Basic ACDP because the actual emissions of volatile organic compounds (VOCs) and hazardous air pollutants (HAPs) are greater than one (1) ton per year.
4. Actual emissions from 2016 are attached to this review report. VOC emission estimates for 2016 are 2.4 tons/year; HAP emission estimates are 2.1 tons/year. The gas-fired boiler emits very small amounts of other pollutants.
5. The source is not subject to the requirements specified in the area source NESHAP for Industrial, Commercial, and Institutional Boilers (40 CFR 63 Subpart JJJJJ) due to the operation of a natural gas boiler as defined by 40 CFR 63.11195(e).
6. The facility is located in an attainment area for all pollutants.
7. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases the emission will not exceed 5 tons of PM or

PM₁₀ or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.

8. The facility is required to record and **report annually by February 15th** the amount of natural gas (cubic feet) burned in the boiler along with the solvent and chemical usage by type. The reported amounts will be used by LRAPA to estimate actual emission and confirm that the facility qualifies for the Basic ACDP.
9. Pursuant to LRAPA Section 37-0056-4, issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA Section 31-0030-3.A. Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

Max
05/05/17

Griffith Rubber Mills					
Emission Estimations					
Solvent Usage					
<u>Product Name</u>	<u>Usage (lbs)</u>	<u>VOC or Air Toxic</u>	<u>Weight %</u>	<u>Emissions (lbs)</u>	<u>Emissions (tons)</u>
Chemlok 252X	1,100	Xylene	65	715	0.358
Chemlok 252X	1,100	Ethyl Benzene	15	165	0.083
Chemlok 252X	1,100	VOC	77.03	847	0.424
Thinner 225	1,364	Methanol	42	573	0.286
Thinner 225	1,364	Toluene	12	164	0.082
Thinner 225	1,364	VOC	100	1364	0.682
Chemlok 220	1,015	Xylene	50	508	0.254
Chemlok 220	1,015	(Perc) Tetrachloroethyler	20	203	0.102
Chemlok 220	1,015	Ethyl Benzene	15	152	0.076
Chemlok 220	1,015	VOC	75.21	763	0.382
Chemlok 205	973	Methyl Isobutyl Ketone	60	584	0.292
Chemlok 205	973	Xylene	15	146	0.073
Chemlok 205	973	Ethyl Benzene	5	49	0.024
Chemlok 205	973	VOC	75.42	734	0.367
Chemlok 236A	25	Xylene	50	13	0.006
Chemlok 236A	25	Trichloroethylene	25	6	0.003
Chemlok 236A	25	Ethyl Benzene	15	4	0.002
Chemlok 236A	25	VOC	83.05	21	0.010
MEK	1,145	VOC	100	1145	0.573
Toluene	145	Toluene	97	141	0.070
Loctite FrekoteAC4368	654	n-Hexane	100	654	0.327
Loctite FrekoteAC4368	654	Benzene	5	33	0.016
Loctite FrekoteAC4368	654	Xylene	1	7	0.003
			VOC Total	4874	2.437
			HAP Total	4114	2.057

Gas-fired Boiler

Gas 4940 hours per year

Pollutant	Max	Emission	Conversio	Annual
	Design capacit	Factor	Factor	Emissions
	(cubic ft/hr)	(lbs/10 ⁶ ft ³)	(tons/lb)	(tons)
PM/PM10/PM2.5	4,200	0	0.0005	0.0000
SO2	4,200	0.051	0.0005	0.0005
NOx	4,200	0.07	0.0005	0.0007
CO	4,200	0	0.0005	0.0000
VOC	4,200	0.0216	0.0005	0.0002

One natural gas-fired boiler: maximum design rate of 4.2 million BTU/hr

Emission factors are from DEQ AQ-EF05 for small, uncontrolled boilers

The boiler is started at 0300 on Mondays and is shut down at 0200 on Fridays