

**LANE REGIONAL AIR PROTECTION AGENCY**

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**STANDARD AIR CONTAMINANT DISCHARGE PERMIT**  
**(STANDARD-ACDP)**

Issued in accordance with provisions of Title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued to:

**Forrest Paint Company**  
1011/990 McKinley Street  
Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene  
Date: September 14, 1999

Mailing Address:

P.O. Box 22110  
Eugene, Oregon 97402

Fee Basis:

Title 37, Table 1:  
B.81: Paint and Allied Products  
Manufacturing subject to an Area Source  
NESHAP  
C.3: Source electing to maintain baseline  
emission rate  
C.7: PTE>10 tons/year of a single HAP

Permit Number: 202805  
Permit Type: Standard  
SIC: 2851 Paint Manufacturing  
Date Issued:  
Expiration Date: 5 years from issuance

Permitted Sources:  
Paint and Coatings Production  
Operation includes:  
9 Baghouses  
1 Biofilter

Issued

by: \_\_\_\_\_  
Merlyn L. Hough, Director

**DRAFT**

Effective

Date: \_\_\_\_\_

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge air contaminants only in accordance with the permit application and the requirements, limitations and conditions contained in this permit. This specific listing of requirements, limitations and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

Emission Unit Description

2. The emission units (EU) regulated by this permit are the following:

Emission Unit	Emission Unit Description	Pollution Control Devices
EU1	Storage Tanks	NA
EU2	Fugitive Valves & Pumps	NA
EU3	81T0000 Solvent Canning	NA
EU4	Tank Wash	NA
EU5	Laboratory (Categorically Insignificant Activity)	NA
EU6	Tinter's Spray Booth	NA
EU7	Solvent Still	NA
EU8	Aerosol Fill Room, Gassing Room and Waste Can Puncturing (Vents 11 & 12)	Carbon Filter (controls waste from can puncturing)
EU9	Solvent-based Paint Manufacturing	Shaker Baghouses (SB-A, SB-B and NB) and Biofilter
EU10	Paint Making Department Clean-Up	Biofilter
EU11	Stainless Steel Twins Cleaning	Biofilter
EU12	Water-based Paint Manufacturing	Jet Pulse Baghouse (JP-4)
EU13	Air Classifying Grinders	Jet Pulse Baghouses (JP-1, JP-2, JP-3 and JP-5)
EU14	Columbia Steam Boiler, Gas-fired Max Design Rate = 0.7 MMBTU/hr (Categorically Insignificant Activity)	NA
EU15	Extruder and Grinder	Jet Pulse Baghouse (JP-6)
EU16	Powder Production Extruder and Grinder	Jet Pulse Baghouse (JP-7)

EU17	Powder Lab Extruder and Grinder	Jet Pulse Baghouse (JP-8)
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Emission Limits and Standards

3. The total emissions for the plant site must not exceed the following 12-month rolling limits listed below. [LRAPA 42-0040, 42-0041]

**Annual Plant Site Emission Limits (PSELs)  
 12-month rolling (tons/year)**

VOC	Total HAPs	Single HAP
58	24	9

PSEL Monitoring

4. By the **fifteenth (15<sup>th</sup>) day of each month**, the permittee must record the process production parameters listed in Condition 23 and calculate the emissions from the previous 12 months using the method in Condition 4.a through 4.e. The totals will be used to demonstrate compliance with the PSELs. [LRAPA 42-0080]

- 4.a. Total Plant Site Emissions

$$\text{12-Month Rolling PSEL} = \sum_{i=1}^{12} [\text{Plant Fugitives}_i + \text{BF Downtime}_i + \text{BF Bypass}_i + \text{BF Fugitives}_i]$$

Where,

$\Sigma$  = Symbol representing “summation of”;

$i$  = Month, beginning with the most recent, summing for 12 preceding, consecutive calendar months;

Plant Fugitives = Emissions from units not controlled by the biofilter;

BF Downtime = Emissions not controlled by the biofilter when the biofilter is non-operational;

BF Bypass = Emissions not controlled by the biofilter when considering stack capture efficiency and biofilter emission control efficiency; and

BF Fugitives = Emissions not controlled by the biofilter when considering only stack capture efficiency.

4.b. Plant Fugitive Emissions

$$\text{Plant Fugitives} = (\text{TANKS Output or Usage}) \times \frac{\text{WP}}{100} \times k$$

Where,

- TANKS Output = Emission output from EPA TANKS program for EU1 devices
- Usage = Pounds or gallons used or produced by devices EU1 through 4, 6 through 8, and 12 (Condition 2)
- WP = Weight percent VOC and/or HAP
- k = Conversion factor (1 ton/2000 lbs)

4.c. Biofilter Downtime

$$\text{BF Downtime} = \text{Usage} \times \frac{\text{WP}}{100} \times \frac{\text{SCEF}}{100} \times \frac{(100\% - \text{BFCE})}{100} \times \text{DTF} \times k$$

Where,

- Usage = LRARM (Liquid, Resin, Additive Raw Materials) usage produced during biofilter downtime (lbs)
- WP = Weight percent VOC and/or HAP
- SCEF = Stack Capture Efficiency Factor (74.3%)
- BFCE = Biofilter control efficiency is zero (0) percent
- DTF = Downtime fraction (downtime hours)/(uptime hours)
- k = Conversion factor (1 ton/2000 lbs)

4.d. Biofilter Bypass

$$\text{BF Bypass} = \text{Usage} \times \frac{\text{WP}}{100} \times \frac{\text{SCEF}}{100} \times \frac{(100\% - \text{BFCE})}{100} \times k$$

Where,

- Usage = LRARM (Liquid, Resin, Additive Raw Materials) usage (lbs) produced during biofilter uptime
- WP = Weight percent VOC and/or HAP
- SCEF = Stack Capture Efficiency Factor (74.3%)
- BFCE = HAP or VOC biofilter control efficiency in Condition 4.f
- k = Conversion factor (1 ton/2000 lbs)

4.e. Biofilter Fugitives

$$\text{BF Fugitives} = \text{Usage} \times \frac{\text{WP}}{100} \times \frac{(100\% - \text{SCEF})}{100} \times k$$

Where,

Usage = LRARM (Liquid, Resin, Additive Raw Materials) usage (lbs) produced during biofilter uptime

WP = Weight percent VOC and/or HAP

SCEF = Stack Capture Efficiency Factor (74.3%)

k = Conversion factor (1 ton/2000 lbs)

4.f. VOC and HAP Biofilter control efficiencies are detailed in the following table:

Pollutant	Biofilter Control Efficiency (%)
Toluene	44.6
Ethylbenzene	56.1
Methyl Isobutyl Ketone (MIBK)	30.2
Xylenes	44.6
Total VOC	44.8

4.g. The permittee must estimate **usage** by the following formula:

$$\text{Usage} = \text{Beginning Inventory} + \text{Purchases} - \text{Ending Inventory}$$

General Emission Limitations

5. Except for any activity or equipment regulated by Conditions 8 through 15, the permittee must ensure that visible emissions from any air contaminant source do not equal or exceed 20 percent opacity. [OAR 340-208-0110(4)]
6. The permittee must ensure that particulate matter emissions from any air contaminant source, other than fugitive emissions, do not exceed 0.14 grains per dry standard cubic foot (dscf). [OAR 340-226-0210(b)(B)]
7. All plant processes, equipment, disposal facilities, and air contaminant collection units, including the baghouses and biofilter, must be operated and maintained at all times in a manner which minimizes air contaminant discharges. [LRAPA 32-005]

Subpart CCCCCC – National Emissions Standards for Hazardous Air Pollutants: Area Source Standards for Paints and Allied Products Manufacturing

**Subpart CCCCCC Emission Standards**

8. The permittee must comply with the following requirements at all times: [40 CFR 63.11601(a)]
  - 8.a. The permittee must add the dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel and operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process. [40 CFR 63.11601(a)(1)]
  - 8.b. The permittee must capture particulate emissions and route them to a particulate control device meeting the requirements of Condition 8.e during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel. This requirement does not apply to pigments and other solids that are in paste, slurry, or liquid form. [40 CFR 63.11601(a)(2)]
  - 8.c. The permittee must:
    - 8.c.i. Capture particulate emissions and route them to a particulate control device meeting the requirements of Condition 8.e during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or [40 CFR 63.11601(a)(3)(i)]
    - 8.c.ii. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry or liquid form. [40 CFR 63.11601(a)(3)(ii)]
  - 8.d. The permittee must:
    - 8.d.i. Capture particulate emissions and route them to a particulate control device meeting the requirements of Condition 8.e during the grinding and milling of materials containing cadmium, chromium, lead, or nickel; [40 CFR 63.11601(a)(4)(i)]
    - 8.d.ii. Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or [40 CFR 63.11601(a)(4)(ii)]
    - 8.d.iii. Ensure that the pigment and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel. [40 CFR 63.11601(a)(4)(iii)]
  - 8.e. The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere. This requirement does not apply to particulate control devices that do not vent to atmosphere. [40 CFR 63.11601(a)(5)]
9. The permittee must comply with the following requirements: [40 CFR 63.11601(b)]
  - 9.a. Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be

equipped with covers or lids meeting the requirements of Conditions 9.a.i through 9.a.iii. [40 CFR 63.11601(b)(1)]

- 9.a.i. The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process. [40 CFR 63.11601(b)(1)(i)]
- 9.a.ii. The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by circumference of the process vessel. The resulting ratio must not exceed 90-percent. [40 CFR 63.11601(b)(1)(ii)]
- 9.a.iii. The covers or lids must be maintained in good condition. [40 CFR 63.11601(b)(1)(iii)]
- 9.b. Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft. [40 CFR 63.11601(b)(2)]
- 9.c. All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if: [40 CFR 63.11601(b)(3)]
  - 9.c.i. All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g. pouring, pumping, and aspirating; and; [40 CFR 63.11601 (b)(3)(i)]
  - 9.c.ii. No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel. [40 CFR 63.11601(b)(3)(ii)]
- 9.d. Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection. [40 CFR 63.11601(b)(4)]
- 9.e. Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container. [40 CFR 63.11601(b)(5)]

#### **Subpart CCCCCC Performance Test and Compliance Requirements**

- 10. The permittee must demonstrate initial compliance by conducting the inspection and monitoring activities in Condition 10.a and ongoing compliance by conducting the inspection and testing activities in Condition 10.b: [40 CFR 63.11602(a)]
  - 10.a. *Initial particulate control device inspections and tests.* The permittee must conduct an initial inspection of each particulate control device according to the requirements in Conditions 10.a.i through 10.a.iii and perform a visible emission test according to the

requirements of Condition 10.a.iii. The permittee must record the results of each inspection and test according to Condition 10.b and perform corrective action where necessary. The permittee must conduct each inspection no later than May 1, 2013 for each control device which has been operated by February 3, 2013. For a control device which has not been installed or operated by February 3, 2013, the permittee must conduct an initial inspection prior to startup of the control device. [40 CFR 63.11602(a)(1)]

- 10.a.i. For each dry particulate control system, the permittee must visually inspect the system ductwork and dry particulate control unit for leaks. The permittee must also inspect the inside of each dry particulate control unit for structural integrity and condition. [40 CFR 63.11602(a)(1)(i)]
  - 10.a.ii. An initial inspection of the internal components of the dry particulate control system is not required if there is a record that an inspection meeting the requirements of Condition 10.a has been performed within the past 12 months and any maintenance actions have been resolved. [40 CFR 63.11602(a)(1)(iii)]
  - 10.a.iii. For each particulate control device, the permittee must conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR part 51, appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results indicate an opacity greater than the applicable limitation in Condition 8.e, the permittee must take corrective action and retest within 15 days. [40 CFR 63.11602(a)(1)(iv)]
- 10.b. *Ongoing particulate control device inspections and tests.* Following the initial inspections, the permittee must perform periodic inspections of each PM control device according to the requirements in Conditions 10.b.i or 10.b.ii. The permittee must also record the results of each inspection according to Condition 11 and perform corrective action as necessary. The permittee must also conduct tests according to the requirements in Condition 10.b.ii and record the results according to Condition 11. [40 CFR 63.11602(a)(2)]
- 10.b.i. The permittee must inspect and maintain each dry particulate control system according to the requirements in Conditions 10.b.i.1 through 10.b.i.2. [40 CFR 63.11602(a)(2)(ii)]
    - 10.b.i.1. The permittee must conduct weekly visual inspections of any flexible ductwork for leaks.
    - 10.b.i.2. The permittee must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter every 12 months.
  - 10.b.ii. For each particulate control device, the permittee must conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, the permittee must conduct a



Method 203C (40 CFR part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicate an opacity greater than the limitation in Condition 8.e, the permittee must comply with the requirements of Conditions 10.b.ii.1 through 10.b.ii.3. [40 CFR 63.11602(a)(2)(iii)]

10.b.ii.1. The permittee must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead or nickel to a process vessel or to the grinding and milling equipment. The permittee must take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in Condition 8.e.

10.b.ii.2. The permittee must prepare a deviation report in accordance with Condition 12.c for each instance in which the Method 203C opacity results were greater than the limitation in Condition 8.e.

10.b.ii.3. The permittee must resume the visible determinations of emissions from the particulate control device in accordance with Condition 10.b.ii three (3) months after the previous visible determination.

11. The permittee must record the following information for each inspection and testing activity: [40 CFR 63.11602(b)]

- 11.a. The date, place, and time;
- 11.b. Person conducting the activity;
- 11.c. Technique or method used;
- 11.d. Operating conditions during the activity;
- 11.e. Results; and
- 11.f. Description of correction actions taken.

### **Subpart CCCCCC Notification, Reporting and Recordkeeping Requirements**

12. *Annual Compliance Certification Report.* The permittee must prepare an annual compliance certification report according to the requirements in Conditions 12.a through 12.c. This report does not need to be submitted unless a deviation from the requirements of Subpart CCCCCC has occurred. When a deviation from the requirements of Subpart CCCCCC has occurred, the annual compliance certification report must be submitted along with the deviation report. [40 CFR 63.11603(b)]

12.a. *Dates.* The permittee must prepare and, if applicable, submit each annual compliance certification report according to the dates specified in Condition 12.a.i through 12.a.iii. [40 CFR 63.11603(b)(1)]

12.a.i. The first annual compliance certification report must cover the first annual reporting period which begins December 3, 2012 and ends on December 31, 2012.

- 12.a.ii. Each subsequent annual compliance certification report must cover the annual reporting period from January 1 through December 31.
- 12.a.iii. Each annual compliance certification report must be prepared no later than January 31 and kept in a readily-accessible location for inspector review. If a deviation has occurred during the year, each annual compliance certification report must be submitted along with the deviation report, and postmarked no later than February 15.
- 12.b. *General Requirements.* The annual compliance certification report must contain the information specified in Condition 12.b.i through 12.b.iii. [40 CFR 63.11603(b)(2)]
  - 12.b.i. Company name and address;
  - 12.b.ii. A statement in accordance with §63.9(h) that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy and completeness of the notification, and a statement of whether the source has complied with all the relevant standards and other requirements of 40 CFR Subpart CCCCCC; and
  - 12.b.iii. Date of report beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
- 12.c. *Deviation Report.* If a deviation has occurred during the reporting period, the permittee must include a description of the deviations from the applicable requirements, the time periods during which the deviations occurred, and corrective actions taken. This deviation report must be submitted along with the annual compliance certification report as required by Condition 12.a.iii. [40 CFR 63.11603(b)(3)]
- 13. *Records:* The permittee must maintain the records specified in Conditions 13.a through 13.d in accordance with Conditions 13.e through 13.f, for five years after the date of each recorded action. [40 CFR 63.11603(c)]
  - 13.a. The permittee must keep a copy of all documentation supporting any Notification of Applicability and Notification of Compliance Status submitted;
  - 13.b. The permittee must keep a copy of each Annual Compliance Certification Report prepared in accordance with Condition 12;
  - 13.c. The permittee must keep records of all inspections and tests; and
  - 13.d. The records must be in a form suitable and readily available for expeditious review.
  - 13.e. The permittee must keep each record for 5 years following the date of each recorded action.
  - 13.f. The permittee must keep each record onsite for at least 2 years after the date of each recorded action. The permittee may keep the records offsite for the remaining 3 years.

### Subpart CCCCCC Additional Requirements and Information

14. Table 1 of 40 CFR Subpart CCCCCC details which parts of the General Provisions in §§63.1 through 63.16 apply. [40 CFR 63.11605]
15. Terms used in 40 CFR Subpart CCCCCC are defined in the Clean Air Act, §63.2 and in 40 CFR 63.11607. [40 CFR 63.11607]

### Inspection & Maintenance Requirements (I&M)

16. *I&M Requirement.* Except any activity or equipment subject to Condition 8 through Condition 15, the permittee must follow the subsequent I&M requirements to assure compliance with the PSELS for VOC and HAP: [LRAPA 32-009-4.]
  - 16.a. *Paint Manufacturing.* Except when under the control of the operator, at least 70% of the open area of all process and storage vessels that contain solvent-based paint or water-reducible paint must be covered. Any container used to store or transport pure or commercial grade solvent must be at least 70% covered, except when under the control of the operator. Inspections to ensure compliance with these requirements must be conducted at least once every two (2) weeks and documented in an I&M log upon occurrence. When necessary, corrective action must be taken within 24 hours. [LRAPA 32-007-1.]
  - 16.b. *Solvent Storage and Transfer.* The permittee must prepare and maintain a Leak Inspection and Maintenance Plan for valves and pump seals located between the tank farms and the factory building that includes, but is not limited to: [LRAPA 32-007-1.]
    - 16.b.i. A monthly visual inspection schedule;
    - 16.b.ii. Methods for documenting the date, the results of each inspection, and any repairs that were made; and
    - 16.b.iii. The timeframe between identifying the leak and making the repair, which adheres to the following schedule:
      - 16.b.iii.1.A. The first attempt at the repair must be made no later than five (5) calendar days after the leak is detected; and
      - 16.b.iii.1.B. Final repairs must be made within fifteen (15) calendar days after the leak is detected, unless the leaking equipment will be replaced by new equipment, in which case, repairs must be completed within three (3) months.
17. *Baghouse Operations & Maintenance (O&M) Plan Requirement.* Excluding any activity or baghouse regulated by Condition 8 through Condition 15, the permittee must demonstrate continuous operation of baghouses to control particulate matter emissions from the paint manufacturing process while the facility is operating. To assure proper operation of the baghouses, the permittee must: [LRAPA 32-007-1.]

- 17.a. Document monthly pressure drop observations;
  - 17.b. Conduct monthly inspections of all baghouses for wear, plugging, abrasion and integrity of mechanical and ancillary systems; and
  - 17.c. Follow an LRAPA approved parameter action level program for each baghouse. The plan must be included with the Biofilter O&M Plan required by Condition 18.
18. *Biofilter O&M Plan Requirement.* Within 30 days of issuance of this permit and by February 15<sup>th</sup> of each year, the permittee must submit an updated Biofilter Operation and Maintenance (O&M) Plan for the Biofilter control device to LRAPA for approval. The permittee must follow the approved Biofilter O&M plan for the duration of the permit. The Biofilter O&M Plan must establish parametric monitoring and parametric action levels at a level ensuring that the Biofilter is operated at the highest reasonable efficiency and effectiveness to minimize emissions and maintain compliance. [LRAPA 32-007-1.]
- 18.a. The permittee must provide a revision of the parametric action level specified in the Biofilter O&M plan if LRAPA finds that such a level does not reflect the highest reasonable efficiency and effectiveness of air pollution control equipment and emission reduction processes. [LRAPA 32-007-2.]

#### Testing Requirements and Emission Factor Verification

19. To assure compliance with the HAP and VOC PSEs, the permittee is required to perform testing on the Biofilter and paint production process in accordance with Conditions 20 and 21. The testing must be conducted in accordance with DEQ's *Source Sampling Manual*, where applicable, and source test plans must be submitted for approval by LRAPA at least thirty (30) days in advance of the source test date. [LRAPA 35-0120, 35-0140]
20. During the permit term, the permittee must perform at least two (2) source tests on the Biofilter. Testing must be completed using EPA Method 18, EPA Method TO-15 or another LRAPA-approved testing method. [LRAPA 35-0120-(1)]
- 20.a. One (1) source test must be performed within the months of June, July or August; and
  - 20.b. One (1) source test must be performed within the months of December, January or February.
  - 20.c. During each test run, the permittee must measure and record the following information:
    - 20.c.i. Temperatures of the Biofilter inlet and exit gas;
    - 20.c.ii. Temperature of the Biofilter sump;
    - 20.c.iii. Flow rates of the Biofilter inlet and exit gas;
    - 20.c.iv. Total and individual target HAP (Methyl Isobutyl Ketone, Toluene, Ethyl Benzene and Xylenes) inlet and outlet concentrations and percent reductions; and,
    - 20.c.v. Production of HAP/VOC-containing materials.

21. Once during the permit term, the permittee must conduct a source test for fugitive HAP emissions of the solvent-based paint manufacturing process to verify the Stack Capture Efficiency Factor utilized in Conditions 4.c, 4.d, and 4.e. Testing must be completed using EPA Method 204E or another LRAPA-approved testing method. [LRAPA 35-0120-(1)]
- 21.a. During each test run, the permittee must measure and record the following information:
- 21.a.i. Flow rates of the Biofilter inlet and all other vents drawing fugitive emissions;
  - 21.a.ii. Total and individual target HAP (Methyl Isobutyl Ketone, Toluene, Ethyl Benzene and Xylenes) concentrations; and
  - 21.a.iii. Production of HAP/VOC-containing materials.

Recordkeeping and Reporting Requirements

22. By **February 15<sup>th</sup>** of each year, the permittee must submit an annual report containing the information specified in Condition 22.a and 22.b for the preceding calendar year (all totals will be 12-month rolling totals). The annual report must also include the Subpart CCCCCC Annual Compliance Certification Report, if required by Condition 12. [LRAPA 35-0160]
- 22.a. The permittee must maintain monthly 12-month rolling totals of the amount of solvent, resin, and additive raw material used, as well as, the amount of natural gas combusted in the Biofilter conditioning air boiler, the hours of Biofilter operation, an updated Biofilter O&M Plan, and the hours of paint manufacturing operation.
- 22.b. The permittee must maintain an estimation of total VOC, total HAPs and single HAP emissions utilizing the equations in Condition 4 and the parameters recorded in Condition 23. All totals will be 12-month rolling totals.
23. The permittee must record the following parameters and use the following emission factors to estimate monthly emissions for single HAP, total HAPs and total VOC: [LRAPA 35-0160]

Emission Units	Process Parameter	Emission Factor	Emission Factor Units	Measurement Frequency
EU1: Storage Tanks	gallons	EPA TANKS 4.09D	NA	Monthly
EU2: Fugitive Valves & Pumps	hrs	Pump = 0.026 Valve = 0.0038	lbs/hr	Monthly
EU3: 81T000 Solvent Canning	gallons	VOC and/or HAP wt. percent	lb/lb	Monthly
EU4: Tank Wash	gallons, hrs	Tank/Can = HAP or VOC wt. percent Evaporation = 0.00584	lb/lb and lb/hr	Monthly

Emission Units	Process Parameter	Emission Factor	Emission Factor Units	Measurement Frequency
EU6: Tinter's Spray Booth	lbs	VOC and/or HAP wt. percent	lb/lb	Monthly
EU7: Solvent Still	lbs	VOC and/or HAP wt. percent	lb/lb	Monthly
EU8: Aerosol Fill Room, Gassing Room and Waste Can Puncturing (Vents 11 & 12)	lbs	VOC and/or HAP wt. percent	lb/lb	Monthly
EU9: Solvent-based Paint Manufacturing	lbs, Biofilter downtime	VOC and/or HAP wt. percent, Biofilter hours	lb/lb, hrs	Monthly
EU10: Paint Making Department Clean-up	lbs, Biofilter downtime	VOC and/or HAP wt. percent, Biofilter hours	lb/lb, hrs	Monthly
EU11: Stainless Steel Twins Cleaning	lbs, Biofilter downtime	VOC and/or HAP wt. percent, Biofilter hours	lb/lb, hrs	Monthly
EU12: Water-based Paint Manufacturing	lbs	VOC and/or HAP wt. percent	lb/lb	Monthly

24. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions must be reported to the following office:

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

Open Burning

25. The permittee is prohibited from conducting open burning on the plant site, except as may be allowed by LRAPA Title 47. [LRAPA 47-001]

Fee Schedule

26. In accordance with adopted regulations, the permittee will be invoiced for the annual permit fee on **October 1<sup>st</sup>**, with fees due on **December 1<sup>st</sup>** of each year. [LRAPA 37-0020, Table 2]

**ABBREVIATIONS, ACRONYMS AND DEFINITIONS**

ACDP	Air Contaminant Discharge Permit
ASTM	American Society for Testing and Materials
AQMA	Air Quality Maintenance Area
BDT	Bone dry ton
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO <sub>2e</sub>	Carbon dioxide equivalent
DEQ	Oregon Department of Environmental Quality
dscf	dry standard cubic foot
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
ft <sup>2</sup>	square foot
GHG	Greenhouse gases
gr/dscf	grains per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44
I&M	inspection and maintenance
lb	pound(s)
LRAPA	Lane Regional Air Protection Agency
MM	million
MMBtu	million British thermal units
NA	not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NOX	nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O <sub>2</sub>	oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	operation and maintenance
Pb	lead
PCD	pollution control device
PM	particulate matter
PM <sub>10</sub>	particulate matter less than 10 microns in size
ppm	part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
scf	standard cubic foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO <sub>2</sub>	sulfur dioxide
VE	visible emissions
VOC	volatile organic compound
year	A period consisting of any 12-consecutive calendar months

## **GENERAL PERMIT CONDITIONS**

### General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [OAR 340-216-0020(3)]
- G2. The permittee must allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. 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.

### Performance Standards and Emission Limits

- G4. The permittee must not cause or permit the deposition of any particulate matter which is larger than 250 microns in size at sufficient duration and quantity, as to create an observable deposition upon the real property of another person. [OAR 340-208-0210]
- G5. The permittee must not discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090-1]
- G6. The permittee must not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090-2]
- G7. The permittee must not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030-1]
- G8. The permittee must not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 49-040]
- G9. The permittee must not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [OAR 340-208-0210]
- G10. The permittee may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause nuisance. [LRAPA 49-010-1]



Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition, including but not limited to excess emissions resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. [LRAPA 36-001-1]

Excess Emissions: Notification and Record-keeping

- G12. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply. The owner or operator, of a small source, as defined by Section 36-005-7, need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health. [LRAPA 36-020-1]

Notification must be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

Follow-up reporting, if required by LRAPA, must contain all information required by Condition G15.

- G13. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee must submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025-4]
- G14. Any excess emissions which could endanger public health or safety must immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee must keep an upset log of all planned and unplanned excess emissions. [LRAPA 36-025-3 and 36-030-1] The upset log must include the following:
- a. date and time each event was reported to LRAPA;
  - b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  - c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;
  - d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
  - e. final resolution of the cause of the excess emissions.

Upset logs must be kept by the permittee for five (5) calendar years. [LRAPA 36-025-4]

Excess Emissions: Scheduled Maintenance

- G16. Where it is anticipated that shutdown, by-pass, or operation at reduced efficiency of production equipment or air pollution control equipment for necessary scheduled maintenance may result in excess emissions, the permittee must obtain prior LRAPA approval of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. [LRAPA 36-015-1] The application must include the following:
- a. reasons explaining the need for maintenance, including why it would be impractical to shut down the source operation during the period, and why the by-pass or reduced efficiency could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
  - b. identification of the specific production or emission control equipment or system to be maintained;
  - c. nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and
  - d. identification of specific procedures to be followed which will minimize excess emissions.
- G17. No scheduled maintenance which is likely to result in excess emissions must occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced "Stage I Red" woodstove advisory period, in areas determined by LRAPA as PM<sub>10</sub> Nonattainment Areas. [LRAPA 36-015-6]
- G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-015-3, the permittee must immediately notify LRAPA by telephone of the situation, and must be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015-7]

Air Pollution Emergencies

- G19. The permittee must, upon declaration of an air pollution episode, take all actions specified in Tables 1, 2, and 3 of LRAPA's Title 51 (see Attachment A) and must particularly put into effect the LRAPA-approved preplanned abatement strategy for such condition, if applicable. [LRAPA 51-015]

Notification of Construction/Modification

- G20. The permittee must notify LRAPA in writing and obtain approval in accordance with LRAPA 34-035 before:

- a. constructing or installing any new source of air contaminant emissions, including air pollution control equipment; or
- b. modifying or altering an existing source that may significantly affect the emissions of air contaminants, or
- c. making any physical change which increases emissions; or
- d. changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation to levels above those contained in the permit application and reflected in this permit and which result in increased emissions.

#### Notification of Name Change

- G21. The permittee must notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

#### Permit Renewal

- G22. Application for renewal of this permit must be submitted not less than 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDP. [OAR 340-216-0040]
- G23. The procedure for issuance of a permit must apply to renewal of a permit. If a completed application for a renewal of a permit is filed with LRAPA in a timely manner, prior to the expiration date of the permit, the permit must not be deemed to expire until final action has been taken on the renewal application to issue or deny a permit. [LRAPA 37-0082-1]

#### Termination Conditions

- G24. This permit will be automatically terminated upon: [LRAPA 37-0082]
- a. Issuance of a renewal or new ACDP for the same activity or operation;
  - b. Written request of the permittee, if LRAPA determines that a permit is no longer required;
  - c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or
  - d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.
- G25. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any applicable rule or statute, LRAPA may revoke the permit. Notice of the intent to revoke the permit will be provided to the permittee in accordance with LRAPA Title 14. The notice will include the reasons why the permit will be revoked, and include an opportunity for hearing prior to the

revocation. A written request for hearing must be received within 60 days from service of the notice, and must state the grounds of the request. The hearing will be conducted as a contested case hearing in accordance with LRAPA Title 14. The permit will continue in effect until the 60 days expires, or until a final order is issued if an appeal is filed, whichever is later. [LRAPA 37-0082-4]

- G26. A permit automatically terminated under 37-0082-2.B. through 2.D. may only be reinstated by the permittee by applying for a new permit, including the applicable new source permit application fees as set forth in Title 37. [LRAPA 37-0082-3]
- G27. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided in LRAPA Title 14. The notification will set forth the specific reasons for the revocation or refusal to renew. For the permittee to contest LRAPA's revocation or refusal to renew LRAPA must receive a written request for a hearing within 90 days of service of the notice and the request must state the grounds for the request. The hearing will be conducted as a contested case hearing in accordance with LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. [LRAPA 37-0082-4.B]
- G28. Any hearing requested must be conducted pursuant to the rules of LRAPA. [LRAPA Title 31]
- G29. Any owner or operator who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information.

#### Asbestos

- G30. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 07/28/17]