

**LANE REGIONAL AIR PROTECTION AGENCY  
 OREGON TITLE V OPERATING PERMIT REVIEW REPORT**

**Lanz Cabinet Shop, Inc.  
 3025 West 7<sup>th</sup> Place  
 Eugene, Oregon 97402**

Lane Regional Air Protection Agency  
 1010 Main Street  
 Springfield, OR 97477

**Source Information:**

|       |        |
|-------|--------|
| SIC   | 2434   |
| NAICS | 337110 |

|  |                      |
|--|----------------------|
| Source Categories (Title 37, Table 1: Part and Code) | B.45, B.69, C.6, C.7 |
|--|----------------------|

**Compliance and Emissions Monitoring Requirements:**

|                       |            |
|-----------------------|------------|
| Unassigned emissions  | NA         |
| Emission credits      | NA         |
| Compliance schedule   | NA         |
| Source test [date(s)] | See Permit |

|                    |    |
|--------------------|----|
| COMS               | NA |
| CEMS               | NA |
| Ambient monitoring | NA |

**Reporting Requirements**

|                                |           |
|--------------------------------|-----------|
| Annual report (due date)       | March 15  |
| Emission fee report (due date) | March 15  |
| SACC (due date)                | August 30 |
| Quarterly report (due dates)   | NA        |

|                            |                             |
|----------------------------|-----------------------------|
| Monthly report (due dates) | NA                          |
| Excess emissions report    | Immediately                 |
| Other reports              | Semi-annual NESHAP and BACT |

**Air Programs**

|                         |     |
|-------------------------|-----|
| NSPS (list subparts)    | NA  |
| NESHAP (list subparts)  | JJ  |
| CAM                     | NA  |
| Regional Haze (RH)      | NA  |
| Synthetic Minor (SM)    | NA  |
| Part 68 Risk Management | NA  |
| Title V                 | Yes |
| ACDP (SIP)              | Yes |

|                               |                         |
|-------------------------------|-------------------------|
| Major HAP source              | Former major HAP source |
| Federal major source          | No                      |
| NSR                           | NA                      |
| PSD                           | NA                      |
| Acid Rain                     | NA                      |
| Clean Air Mercury Rule (CAMR) | NA                      |

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**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT**

|                  |  |                   |  |
|------------------|--|-------------------|--|
| ACDP             | Air Contaminant Discharge Permit                           | M                 | 1,000  |
| Act              | Federal Clean Air Act                                      | MM                | 1,000,000  |
| AQMA             | Air Quality Management Area                                | MB                | Material Balance                                       |
| ASTM             | American Society of Testing and Materials                  | MSF               | 1,000 Square feet 3/8" basis                           |
| BER              | Baseline Emission Rate                                     | MSDS              | Material Safety Data Sheets                            |
| BH               | Baghouse   | NA                | Not applicable   |
| Btu              | British thermal unit                                       | NCA               | Notice of Civil Penalty                                |
| CAM              | Compliance Assurance Monitoring                            | NO <sub>x</sub>   | Nitrogen oxides  |
| CEMs             | Continuous emission monitoring system                      | NESHAP            | National Emission Standard for Hazardous Air Pollutant |
| CFR              | Code of Federal Regulations                                | NON               | Notice of Non-Compliance                               |
| CO               | Carbon Monoxide  | NSPS              | New Source Performance Standards                       |
| CO <sub>2</sub>  | Carbon Dioxide   | NSR               | New Source Review                                      |
| CO <sub>2e</sub> | Carbon Dioxide Equivalent                                  | O <sub>2</sub>    | Oxygen   |
| CPMS             | Continuous parameter monitoring system                     | OAR               | Oregon Administrative Rules                            |
| DEQ              | Department of Environmental Quality                        | ORS               | Oregon Revised Statutes                                |
| dscf             | Dry standard cubic feet                                    | O&M               | Operation and maintenance                              |
| EF               | Emission factor  | Pb                | Lead   |
| EPA              | US Environmental Protection Agency                         | PCD               | Pollution Control Device                               |
| ERC              | Emission Reduction Credit                                  | PM                | Particulate matter                                     |
| EU               | Emissions Unit   | PM <sub>10</sub>  | Particulate matter less than 10 microns in size        |
| F                | Fahrenheit   | PM <sub>2.5</sub> | Particulate matter less than 2.5 microns in size       |
| FCAA             | Federal Clean Air Act                                      | ppm               | Parts per million                                      |
| GHG              | Greenhouse Gas   | PSEL              | Plant Site Emission Limit                              |
| gr/dscf          | Grain per dry standard cubic foot (1 pound = 7,000 grains) | psia              | pounds per square inch, actual                         |
| HAP              | Hazardous Air Pollutant as defined by LRAPA Title 12       | SIP               | State Implementation Plan                              |
| ID               | Identification number                                      | SO <sub>2</sub>   | Sulfur dioxide   |
| I&M              | Inspection and maintenance                                 | ST                | Source test  |
| IPA              | Isopropyl Alcohol  | TOC               | Total Organic Compound                                 |
| lb               | Pound  | VE                | Visible emissions                                      |
| LRAPA            | Lane Regional Air Protection Agency                        | VHAP              | Volatile Hazardous Air Pollutant                       |
|                  |  | VMT               | Vehicle miles traveled                                 |
|                  |  | VOC               | Volatile organic compounds                             |
|                  |  | VOL               | Volatile organic compounds                             |

## **PERMITTEE IDENTIFICATION**

1. Lanz Cabinet Shop, Inc. (Lanz or “the facility”) owns and operates a cabinet manufacturing facility under the primary SIC Code 2434 and is located at 3025 West 7<sup>th</sup> Place, Eugene, Oregon.

## **FACILITY DESCRIPTION**

2. Lanz began operation in May 1998. Previously, the facility operated a cabinet manufacturing operation located at 3815 West 11<sup>th</sup> Avenue, Eugene, Oregon. The West 11<sup>th</sup> Ave. operation was constructed in 1960 and was operated continuously until the operations were moved to its current location on 3025 West 7<sup>th</sup> Place, Eugene, Oregon. The only equipment transferred from the old facility to the current facility was the wood-working equipment. The coating equipment and particulate matter control equipment were installed at the 3025 West 7<sup>th</sup> facility in 1998.

Lanz relocated to 3025 West 7<sup>th</sup> Place in May of 1998, where the facility installed an UV-Cured Coating line without first applying for Air Contaminate Discharge Permit (ACDP) prior to installing the new equipment on site. Lanz received a Notice of Non-Compliance (NON No. 1534) for failure to submit construction review and for failure to submit an application for an ACDP prior to operating the new equipment. Lanz submitted the ACDP application on February 10, 1999. Because Lanz installed the coating line without demonstrating a restriction of HAPs emissions under the major source thresholds by submitting an Initial Compliance Report to EPA and LRAPA within the timelines specified in 40 CFR 63, Subpart JJ: National Emission Standards for Wood Furniture Manufacturing Operations promulgated December 7, 1995, the facility become subject to the all applicable requirements of 40 CFR 63, Subpart JJ and Lanz was required to obtain a Title V operating permit. At the time of the issuance of the 1999 ACDP, the facility calculated HAP emissions were below the major thresholds of 10 tons per year of a single HAP and 25 tons per year of combined HAPs.

The 2002 application Title V operating permit, Lanz determined that the facility’s Potential to Emit (PTE) for HAP was over the major source thresholds of 10 tons per year for a single HAP for Methyl Ethyl Ketone (MEK), and 25 tons per year of combined HAPs. In 2005 MEK was removed from the for hazardous air pollutants (HAP) listed in Section 112(b) of the 1990 Clean Air Act Amendments (CAAA), effectively reestablishing the facility’s HAP PTE under the major thresholds for both a single and combined HAPs.

## **INTRODUCTION**

3. This is an existing facility applying for a renewal of its existing Title V operating permit issued on May 28, 2010. The existing permit expired on May 25, 2015. Lanz did not submit a timely application and received a Notice of Non-Compliance (NON No. 3531) on December 16, 2015 and a Stipulated Final Order (SFO No. 15-3531) on February 16, 2016 addressing their failure to submit a timely renewal application. The SFO allowed the facility to continue to operate under the 2010 Title V permit until the issuance of Title V renewal.
4. In accordance with OAR 340-218-0120, this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.
5. The facility is located in a maintenance area for PM<sub>10</sub> and CO and attainment for other pollutants.
6. The current permit was issued on May 28, 2010 and was originally scheduled to expire on May 25, 2015. The following changes have been made at the facility during the last permit term:

| Date       | Permit revision or notification | Brief explanation   |
|------------|---------------------------------|---|
| 10/24/2011 | Section 502(b)(10) Change       | Conversion of warehouse to coating and production area for the installation of a spray booth for hand application of coatings, within the parameters of Subpart JJ. |
| 10/24/2013 | Section 502(b)(10) Change       | Installation of a spray booth for hand application of coatings, within the parameters of Subpart JJ.  |
| 01/02/2014 | Section 502(b)(10) Change       | Installation of a spray booth for hand application of coating, an Edge Bander, and a Panel Saw.   |
| 10/24/2016 | Administrative Permit Amendment | Change the Responsible Official and Facility Contact Person   |

**OPERATING SCENARIO**

7. The facility has a single operating scenario.

**EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION**

8. The emissions units at this facility are the following:

| Emission Unit Description   |   | EU ID | Pollution Control Device Description | PCP ID         |
|---|---|-------|--------------------------------------|----------------|
| Sawdust Handling System: Including – Baghouse Truck Dump and Waste Wood Chipper |   | EU-1  | Baghouses                            | DV-1a<br>DV-1b |
| Surface Coaters: VOC Emissions  |   | EU-2  | UV Coater                            | #244-2         |
|   |   |       | Spray Booth                          | DV-4           |
|   |   |       | Automatic Spray Booth                | #325-2         |
| Insignificant Emission Units (IEU)  | PM/PM <sub>10</sub> /PM <sub>2.5</sub> : EU-2 Surface Coaters | IEU   | Paint Filters                        | DV-10          |
|   | Natural Gas Combustion Units                                  |       | NA                                   | NA             |
|   | • Phase 1 Boiler: 0.76 MMBtu/hr                               |       |                                      |                |
|   | • Phase 2 Boiler: 2.16 MMBtu/hr                               |       |                                      |                |
|   | • Heater: 0.26 MMBtu/hr                                       |       |                                      |                |
|   | • Heater: 0.26 MMBtu/hr                                       |       |                                      |                |
|   | • Small natural gas combustion units = 1.15 MMBtu/hr          |       |                                      |                |

9. Sawdust Handling System – Emission Unit EU-1: The Sawdust Handling System includes the waste wood chipper, edge bander, panel saw, conveying system, truck dump, and two baghouses. The baghouses have a control efficiency of 99.975 percent based on an emission factor of 0.5 pounds per bone dry ton (lb/BDT) of throughput. Based on a maximum throughput of 4,000 BDT, maximum PM/PM<sub>10</sub>/PM<sub>2.5</sub> are estimated at over one (1) ton per year, which exceeds the PM/PM<sub>10</sub>/PM<sub>2.5</sub> de minimis levels and therefore, a PSEL is required for PM/PM<sub>10</sub>/PM<sub>2.5</sub>. There are emission unit specific applicable requirements for EU-1 incorporated in the permit.

10. Surface Coaters: Emission Unit EU-2: The surface coating operation includes a UV coater, spray booths, and automatic spray booth and cure booth. The UV coater is a continuous coater with overspray recovery. The spray booths are equipped with high efficiency paint filters. The automatic coater and cure booth are equipped with a

system to recover overspray and has a high efficiency dry filtration system. VOC and VHAPs are the primary emissions for this unit and are calculated using mass balance and averaging equations found in the permit. There are also PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions associated with these coating operations that are either controlled by overspray recovery systems or by paint filters which capture at least 99.8% of the particulate matter produced by the overspray. The PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions are calculated assuming that the overspray is conservatively, 20% and the average coating density is 9.5 lb/gallon. The annual emissions for PM/PM<sub>10</sub>/PM<sub>2.5</sub> are estimated at 7.6 pounds per year. The PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from surface coating are included in "insignificant emission unit" EU-IEU. The coating operations are subject to 40 CFR 63, Subpart JJ – Wood Furniture Manufacturing Operations for HAPs and Best Available Control Technology (BACT) requirements for VOCs.

11. IEU: The Insignificant Emission Units includes all the natural gas combustion units and the PM/PM<sub>10</sub>/PM<sub>2.5</sub> emissions from EU-2. The combustion units consist of two (2) boilers, three (3) 260,000 Btu/hr heaters, and numerous small combustion devices with an aggregate heat input rating of approximately 1,150,000 Btu/hr. Lanz has taken a natural gas combustion limit of 200,000 therms per year for the entire plant, which effectively keeps the emitted pollutants, PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub> and VOC, under the de minimis level of one (1) ton per year and therefore, the combustion units in totality are considered an Insignificant Emission Unit. There are specific applicable requirements for the IEUs.
12. Categorically Insignificant Activities: The facility has the following categorically insignificant activities:
  - Evaporative and tail pipe emissions from on-site motor vehicle operation;
  - Distillate oil, gasoline, natural gas, or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified as categorically insignificant do not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically insignificant with the remainder not categorically insignificant. The following equipment may never be included as categorically insignificant;
    - Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour;
    - Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour.
  - Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pump, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL;
  - Office activities;
  - Janitorial activities;
  - Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance;
  - Maintenance and repair shop;
  - Automotive repair shops or storage garages;
  - Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment;
  - Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems;
  - Temporary construction activities;
  - Warehouse activities;
  - Accidental fires;
  - Air vents from air compressors;
  - Electrical charging station;
  - Fire Brigade Training;
  - Fire suppression;

- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking;
- Electric motors;
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids;
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles;
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment;
- Pressurized tanks containing gaseous compounds;
- Vacuum sheet stacker vents;
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Fire suppression and training;
- Paved roads and paved parking lots within an urban growth boundary;
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads, except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils;
- Health, safety, and emergency response activities;
- Emergency generators and pumps used only during loss of primary equipment or utility service due to circumstances beyond the reasonable control of the owner or operator, or to address a power emergency, provided that the aggregate horsepower rating of all stationary emergency generator and pump engines is not more than 3,000 horsepower. If the aggregate horsepower rating of all stationary emergency generator and pump engines is more than 3,000 horsepower, then no emergency generators and pumps at the source may be considered categorically insignificant;
- Uncontrolled oil/water separators in effluent treatment systems, excluding systems with a throughput of more than 400,000 gallons per year of effluent located at petroleum refineries, sources that perform petroleum refining and re-refining of lubricating oils and greases including asphalt production by distillation and the reprocessing of oils and/or solvents for fuels; or bulk gasoline plants, bulk gasoline terminals, and pipeline facilities; and
- Combustion source flame safety purging on startup.

#### **EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING**

13. The following sections describe each condition's requirement in the permit, with the intent of the condition and a brief discussion of any unique features of the requirements.
- 13.a. Conditions 1 and 2 are general statements required in and common to all Title V permits issued by LRAPA.
  - 13.b. Condition 3 provides a list of equipment and identification of pollution control devices for the facility.
  - 13.c. Condition 4 and 5 are facility-wide fugitive dust control requirements that allows the permittee to deal with potential fugitive dust problems before they become standard violations. The reasonable precautions can be required without the need to show a violation. (e.g., dust from traffic on roads).
  - 13.d. Condition 6 is a facility-wide nuisance resolution condition that establishes timely response to any complaints that the operation at the facility may generate.
  - 13.e. Condition 7 implements a long-standing particulate matter fallout provision in LRAPA rules. This is a facility-wide condition. For monitoring and recordkeeping for this condition refer to the periodic visible emission surveys required in Condition 4 and 5.
  - 13.f. Condition 8 is a facility-wide inspection and maintenance plan (I&M Plan) for scheduling control device(s) and emitting equipment for inspection and to ensure that necessary maintenance is performed.

- 13.g. Condition 9 is a requirement that if the facility should become subject to the accidental release prevention regulations of 40 CFR 68, that the facility will submit a risk management plan (RMP).
- 13.h. Condition 10 lists the annual Plant Site Emission Limits (PSELs) for the facility.
- 13.i. Condition 11 is a production limit of natural gas to keep the facility under the de minimis levels for criteria pollutants for all the combustion units at the facility.
- 13.j. Condition 12 contains specific monitoring requirements to demonstrate compliance with the PSEL by using specific process parameters and calculations.
- 13.k. Condition 13 contains an applicable requirement for limits opacity limits to 20% for emission unit EU-1.
- 13.l. Condition 14 contains an applicable requirement for grain loading standards of 0.10 grains per dry standards cubic foot for emission unit EU-1.
- 13.m. Condition 15 contains an applicable requirement for process weight limits stated in LRAPA Table 32-8010 for emission unit EU-1.
- 13.n. Condition 16 contains a monitoring requirement for quarterly of visible emissions surveys using EPA Method 22 and inspection and maintenance of the baghouses for EU-1.
- 13.o. Condition 17 contains a monitoring requirement if the permittee sees visible emissions after taking corrective actions to reduce visible emissions but are continuing to have visible emissions. The permittee must perform visible emissions surveys using EPA Method 203B for EU-1, if that occurs.
- 13.p. Condition 18 contains a recordkeeping requirement to maintain all surveys and corrective action taken in a log form for EU-1.
- 13.q. Condition 19 is the applicability of emission unit EU-2 to VHAP emission limits requirements per 40 CFR 63, Subpart JJ - Wood Furniture Manufacturing Operations.
- 13.r. Condition 20 states that the permittee of emission unit EU-2 must comply with requirements of 40 CFR 63, Subpart JJ.
- 13.s. Condition 21 contains VHAP emission limits for finishing operations and contact adhesive, HAP limits for strippable spray booths, and formaldehyde limits for coatings and contact adhesives.
- 13.t. Condition 22 contains that the permittee must operate and maintain EU-2 in a manner consistent with safety and good air pollution practices to minimize emissions.
- 13.u. Condition 23 contains work practice standards that includes a written work practice implementation plan that is available for inspection by LRAPA.
- 13.v. Condition 24 contains training that the permittee must provide for all new, existing and contract personnel that are involved with finishing, gluing, cleaning and washoff operations associated with EU-2 at the facility.
- 13.w. Condition 25 contains information required in the inspection and maintenance plan that ensures that all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents are inspection at least monthly and final repairs are done within 15 days upon discovery.
- 13.x. Condition 26 contains information required for cleaning and washoff solvent accounting system form; quantity and type of organic HAP solvent used per month, number of pieces washed and reason why, quantity of spent organic HAP and whether it is recycled onsite or disposed offsite.
- 13.y. Condition 27 contains language of pollutants that must not be used for cleaning or washoff solvents.
- 13.z. Condition 28 contains language stating that the permittee must not use compounds containing more than 0.8 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, or plastic filters unless the spray booth is being refurbished.
- 13.aa. Condition 29 states that finishing, gluing, cleaning and washoff material container must be closed when stored.

- 13.bb. Condition 30 states that the permittee must not use conventional air spray gun except for the finishing application station that are routed to a control device.
- 13.cc. Condition 31 states that all organic HAP solvent used for line cleaning must be pumped or drained into a normally closed container.
- 13.dd. Condition 32 states that all organic HAP solvent used to clean spray guns must be collected into a normally closed container.
- 13.ee. Condition 33 states that the permittee must control emissions from washoff operation by using normally closed tanks and minimizing dripping by tilting and rotating part to drain as much solvent as possible.
- 13.ff. Condition 34 states the permittee must prepare and maintain with the work practice implement plan, a formulation plan that, identifies VHAP from list presented in Table 5 of Subpart JJ, establish baseline of usage at highest annul usage, tracks annual usage of each VHAP from Table 5, limit that permittee must not exceed and if an exceedance happens a written notification must be sent to LRAPA with an explanation of the exceedance.
- 13.gg. Condition 35 contains a monitoring requirement with the equation for calculating the average VHAP for all finishing materials, and the limit if the permittee choses to used compliant finishing material.
- 13.hh. Condition 36 states that the permittee must use compliant contact adhesives with a VHAP content no greater than 0.2 lb VHAP/lb solid.
- 13.ii. Condition 37 states the permittee must have continuous compliance demonstration by submitting a compliance certification with every semiannual report with the averaging calculation (Equation 6), the permittee is using compliant stains, washcoats, sealers, topcoats, basecoats, enamels, thinners, contact or foam adhesives, and strippable spray booth coatings, while using a continuous coater determine the VHAP content of the coating, and the permittee must state that the work practice implementation plan is being followed.
- 13.jj. Condition 38 states that permittee must calculate, using Equation 7, the total formaldehyde emissions from all finishing materials and contact adhesives used and maintain no more than 400 pounds per rolling 12-month period
- 13.kk. Condition 39 contains the EPA test methods for doing a performance test, if the permittee is required to perform one.
- 13.ll. Condition 40 states that the permittee must of records of all CPDS for finishing materials, thinners, contact adhesive, and strippable spray booth coating, the VHAP content (lb VHAP/lb solid) for all finishing materials and contact adhesive subject to the emission limits, VOC content (lb VOC/lb solid) for all strippable booth coatings, and the formaldehyde content (lb/gal) of each finishing material and contact adhesive subject to the emission limit.
- 13.mm. Condition 41 states that the permittee must maintain copies of the averaging calculation for each month, as well as the data of the quantity of coating and thinner used.
- 13.nn. Condition 42 states the permittee must maintain the records of the solvents and coatings additions to the continuous coater reservoir, viscosity measurements, and data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
- 13.oo. Condition 43 states that the permittee must maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of the plan including records demonstrating that the operator training program is in place, records collected for the inspection and maintenance plan, records associated with the cleaning solvent accounting system and formulation assessment plan, and copies of documentation developed to demonstrate that the all provisions of the work practice implementation plan are being followed.
- 13.pp. Condition 44 states that the permittee subject to emission limits must maintain records of compliance certifications submitted for each semiannual period following the compliance date.

- 13.qq. Condition 45 states the permittee must maintain records of all information submitted with the compliance status report and the semiannual reports requirements.
- 13.rr. Condition 46 states the permittee must retain all records for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, of most recent 2 years on site and 3 years can be retained offsite 40 CFR 63.10(b)(1).
- 13.ss. Condition 47 states that the permittee must maintain records of the occurrence and duration of malfunction of process equipment or the air pollution equipment and what corrective actions were taken to restore malfunctioning equipment to normal manner of operation.
- 13.tt. Condition 48 states the permittee must demonstrate compliance with all the conditions of the continuous compliance demonstration monitoring requirements and the formaldehyde limitations and must submit a report covering the previous 6 months. If there are any malfunctions during the reporting period, the report must also include the number, duration and a brief description of each type of malfunction which occurred, and any possible emission limitation exceedances and corrective action taken.
- 13.uu. Condition 49 states that if the permittee increases usage for the surface coaters stated in the Initial Notification, then permittee must provide a written notification to LRAPA with the reasons for the increase.
- 13.vv. Condition 50 states that the surface coaters at the permittee's facility are applicable to Best Available Control Technology (BACT) for VOC and states applicable limits are for finishing operations, higher solid sealers and topcoats and cleaning operations.
- 13.wv. Condition 51 contains the calculation formula for the allowable monthly VOC average that must be calculated by the 15<sup>th</sup> of each month.
- 13.xx. Condition 52 states the recordkeeping requirements to demonstrate compliance with the VOC BACT, such as the type, quantity, density, VOC and solids content for all adhesives, coatings, sealers, topcoats, and solvents, the Certified Product Data Sheets (CPDS), Materials Safety Data Sheet (MSDS) or Safety Data Sheet (SDS) for each product used and submitting the averaging calculations with a compliance certification.
- 13.yy. Condition 53 contains the applicable requirements for insignificant activities (IEUs) such as 20% opacity limit, grain loading standard of 0.01 gr/dscf and process weight for non-fugitive, non-fuel burning process equipment.
- 13.zz. Condition 54 states that the permittee is not required to do testing, monitoring, recordkeeping, or reporting for the applicable emission limits/standards that apply to IEUs, but if the permittee performs testing for compliance purposes, then the permittee is required to use test methods identified in definitions of Title 12 for "opacity" and "particulate matter" and must perform testing per DEQ's *Source Sampling Manual*.
- 13.aaa. Condition 55 contains the emission fees based on the PSEL for each emission unit.
- 13.bbb. Condition 56 contains the general testing requirements.
- 13.ccc. Conditions 57-59 contains the general monitoring requirements for the facility.
- 13.ddd. Conditions 60-63 contains the general recordkeeping requirements for the facility.
- 13.eee. Condition 64 contains specific recordkeeping requirements for the facility.
- 13.fff. Condition 65 states the if any specific recordkeeping requirements are the same in Condition 64 then the permittee does not have to keep duplicate records as long as the records are clearly referenced to the applicable requirement.
- 13.ggg. Condition 66-70 contains the general reporting requirements for the facility.
- 13.hhh. Condition 71 lists the annual and semi-annual reporting requirements for the facility.
- 13.iii. Condition 72 lists specific annual reporting requirements for the facility.

- 13.jjj. Condition 73 lists specific semi-annual reporting requirements for the facility.
- 13.kkk. Condition 74 lists the specific NESHAP semi-annual reporting for the surface coating operations.
- 13.lll. Condition 75 list the specific BACT reporting for the semi-annual and annual reporting.
- 13.mmm. Condition 76 contains the circumstances in which the facility needs to update its Initial Compliance Status Report.
- 13.nnn. Condition 77 contains a general condition about utilizing other monitoring and compliance methods for the purpose of submitting compliance certifications.
- 13.ooo. Condition 78 is a list of Federal regulation not applicable to the facility and why it is not applicable.

**SPECIAL CONDITIONS AND REQUIREMENTS:**

- 14. Best Available Control Technology (BACT) for VOC applicable to Surface Coaters (EU-2): On October 26, 1999, the facility was issued an ACDP with a VOC PSEL of 39.6 tons per year. This limit was set to keep VOC emissions to less than the Significant Emission Limit above the baseline year emissions and thus avoid New Source Review (NSR). In May 2002, Lanz requested and was granted a VOC PSEL increase to 70 tons per year. This increase triggered minor NSR and at that time, LRAPA’s minor NSR requirements included that the facility had to provide a BACT analysis. The facility, in a letter submitted by Stoel Rives LLP dated October 30, 1998, argued that the MACT standard for HAPs and the new state of the art UV coating equipment installed at the facility, qualified as BACT for VOC. In the original Title V Operating Permit and the proposed permit renewal includes BACT limitations derived from EPA’s “A Guide to the Wood Furniture CTG and NESHAP” published September 1997, based from the Stoel Rives LLP letter. The facility has operated in compliance with the BACT VOC limitations published in EPA’s guide. In 2002, the BACT review, LRAPA and DEQ NSR rules established a new netting basis for a source that satisfied NSR including BACT. BACT requirements in this renewal are unchanged from the original BACT requirements. BACT requirements include monthly average VOC limits in pounds VOC per pound of solids for specific surface coating. Compliance is determined through recordkeeping and monthly compliance calculations.

**VOC BACT Emission Limits\***

| Coating Type                                       | Allowable Monthly Average<br>(lb VOC/lb Solids) |
|--|---|
| <u>Finishing operations</u><br>Waterborne Topcoats | 0.8   |
| <u>Higher solids sealer and topcoats</u>           |   |
| Sealers  | 1.9   |
| Topcoats   | 1.8   |
| Acid-cured alkyd amino vinyl Sealer                | 2.3   |
| Acid-cured alkyd amino conversion Varnish Topcoats | 2.0   |

\* ”Environmental Protection Agency. (September1997). *A Guide to the Wood Furniture CTG and NESHAP*. (EPA Publication No. 453/R-97-002). Research Triangle Park, NC: U.S. Environmental Protection Agency.”

- 15. NESHAP Limitations and Monitoring for Wood Furniture Manufacturing: 40 CFR 63, Subpart JJ

The emission unit regulated by these requirements is the EU-2 Surface Coaters. EPA promulgated residual risk standards for this NESHAP subpart on 11/21/2011. The residual risk limit formaldehyde usage in coating and adhesives. The facility regularly reports in compliance certifications that they do not use strippable spray booth coatings, but instead scrape booths every 6-8 weeks. Facility also reports not conducting cleaning and washoff

activities. However, the strippable spray booth coating and washoff activity requirements are maintained in the permit for operational flexibility. Subpart JJ requires that the facility follow all the requirements listed below:

- 15.a. Applicability and designation of source per 40 CFR 63.800(a), (e), and (h).
- 15.b. Definitions per 40 CFR 63.801.
- 15.c. Emission limits per 40 CFR 63.802(b) and (c):

**Summary of Emission Limits per Table 3 of 40 CFR 63 Subpart JJ**

| Emission Point  | Limits |
|---|--------|
| <b>Finishing Operations</b>   |        |
| (a) Achieve a weighted average VHAP content across all coating (maximum lb VHAP/lb solids), as applied:   | 0.8    |
| (b) Use compliant finishing materials (maximum lb VHAP/lb solids), as applied   |        |
| - stains  | 1.0    |
| - washcoats   | 0.8    |
| - sealers   | 0.8    |
| - topcoats  | 0.8    |
| - basecoats   | 0.8    |
| - enamels   | 0.8    |
| - thinners (maximum percent VHAP allowable; or  | 10.0 % |
| (c) As an alternative, use control device; or   | 0.8    |
| (d) Use any combination of (a), (b) and (c)   | 0.8    |
| <b>Cleaning Operation:</b>  |        |
| Strippable spray booth material (maximum VOC content, lb VOC/lb solids)   | 0.8    |
| <b>Contact Operations:</b>  |        |
| Strippable spray booth material (maximum VOC content lb VOC/lb solids)  | 0.8    |
| <b>Contact Adhesives</b>  |        |
| (a) Use compliant contact adhesives (maximum lb VHAP/lb solids) based on following criteria:  |        |
| i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates   | NA     |
| ii. For foam adhesives used in products that meet flammability requirement  | 0.2    |
| iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or                 | 0.2    |
| (b) Use a control device  | 0.2    |
| <b>All Finishing Operations and Contact Adhesives</b>   |        |
| (a) Achieve total free formaldehyde emissions across all finishing operations and contact adhesives, lb per rolling 12-month period, as applied | 400    |
| (b) Use coatings and contact adhesives only if they are low-formaldehyde coating and contact adhesives  | 1.0    |

- 15.d. Work practice standards per 40 CFR 63.803(a) through (l):

15.d.i. Lanz must prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice presented in 40 CFR 63.803. The work practice implementation plan must be available for inspection by LRAPA and/or EPA. The work practice implementation plan must include the following:

- Operator training course,
- Inspection and maintenance plan,
- Cleaning and washoff solvent accounting system,
- Chemical composition of cleaning and washoff solvents,
- Spray booth cleaning,
- Storage requirements,
- Application equipment requirements,
- Line cleaning,
- Gun cleaning,
- Washoff operation, and
- Formulation assessment plan for finished operations.

15.e. Compliance procedures and monitoring requirements per 40 CFR 63.804(d), (e), (g), and (h). The permittee has fulfilled initial compliance referred in 40 CFR 63.804(f) by submitting the Initial Compliance Status Report on August 30, 1999 and therefore, this subsection has been removed from the permit.

15.f. Performance test methods per 40 CFR 63.805(a)(1)

15.g. Recordkeeping requirements per 40 CFR 63.806(b), (c), (d), (e), (h), (i), (j), and (k).

15.h. Reporting requirements 40 CFR 63.807(c) and (e).

16. Insignificant Combustion Units (EU: IEU):

16.a. Lanz is required to limit facility-wide combustion of natural gas to 200,000 therms per year, to ensure that the criteria pollutants emissions are Aggregate Insignificant level of 1 ton per year for PM/PM<sub>10</sub>/PM<sub>2.5</sub>, CO, NO<sub>x</sub>, VOC, and SO<sub>2</sub> making all the natural gas-fired combustion units at facility an Insignificant Emission Units (EU: IEU).

**HAZARDOUS AIR POLLUTANTS**

17. The following is a summary of the annual emissions (tons per year) of Lanz for hazardous air pollutants (HAP) listed in Section 112(b) of the 1990 Clean Air Act Amendments (CAAA). During the 2002 initial permitting of the Title V Operating Permit it was determined that the facility had the potential to emit over the major source thresholds for HAPs. The facility had the potential to emit (PTE) 13 tons of MEK per year and had a PTE of 28 tons per year of combined HAPs. In 2005, MEK was removed from the EPA HAP list effectively reducing the facility's emission below the HAP major source thresholds.

The following are the actual emissions (tons per year) for the facility for 2017 and July 2017-June 2018 for hazardous air pollutants listed in Section 112(b) of the 1990 Clean Air Act Amendments (CAAA). The emissions totals below reflect the maximum HAP emissions from the facility. The table demonstrates that the facility emits less than ten (10) tons per year of any single HAP and/or less than 25 tons per year of total HAPs.

| Hazardous Air Pollutants | CAS #   | 2017 Reported Emission (tons/yr) | July 2017-June 2018 Reported Emissions (tons/yr) |
|--------------------------|---------|----------------------------------|--|
| Formaldehyde             | 50-00-0 | 0.002                            | 0.003  |
| Methanol (Wood Alcohol)  | 67-56-1 | 2.507                            | 2.77   |

| Hazardous Air Pollutants | CAS #     | 2017 Reported Emission (tons/yr) | July 2017-June 2018 Reported Emissions (tons/yr) |
|--------------------------|-----------|----------------------------------|--|
| Benzene                  | 71-43-2   | 0                                | 0  |
| o-Cresol                 | 95-48-7   | 0                                | 0  |
| Cumene                   | 98-82-8   | 0.004                            | 0.006  |
| Ethyl Benzene            | 100-41-4  | 0.005                            | 0.006  |
| Methyl Isobutyl Ketone   | 108-10-1  | 0.017                            | 0.051  |
| Toluene/Methyl Benzene   | 108-88-3  | 0.033                            | 0.058  |
| Triethylamine            | 121-44-8  | 0.414                            | 0.515  |
| Xylene, Mixed Isomers    | 1330-20-7 | 0.30                             | 0.036  |
| <b>Total</b>             |           | <b>3.252</b>                     | <b>3.445</b>                                     |

### AGGREGATE INSIGNIFICANT ACTIVITIES

#### Aggregate Insignificant Emission

18. Aggregate Insignificant Emissions from activities identified by the facility are detailed in the following table:

| Emissions Source                        | Pollutants (tons/year) |                  |                   |             |                 |             |                 |
|---|------------------------|------------------|-------------------|-------------|-----------------|-------------|-----------------|
|   | PM                     | PM <sub>10</sub> | PM <sub>2.5</sub> | CO          | NO <sub>x</sub> | VOC         | SO <sub>2</sub> |
| Surface Coaters Particulate Matter only | 0.004                  | 0.004            | 0.004             | 0           | 0               | 0           | 0               |
| Natural Gas Combustion Units            | 0.025                  | 0.025            | 0.025             | 0.84        | 1.0             | 0.06        | 0.02            |
| <b>Totals</b>                           | <b>0.029</b>           | <b>0.029</b>     | <b>0.029</b>      | <b>0.84</b> | <b>1.0</b>      | <b>0.06</b> | <b>0.02</b>     |

\*Based on the PM, PM<sub>10</sub>, & PM<sub>2.5</sub> emissions for the Surface Coaters EU-2 as part of EU-IEU and the natural gas-fired combustion units EU-IEU.

19. Aggregate Insignificant Emissions Units are defined as the annual actual emissions of any regulated air pollutant from one or more designated activities at a source that are less than or equal to one (1) ton of the regulated pollutant per year and therefore, are considered insignificant. The applicable requirements for the Aggregate Insignificant Emissions are set forth in the Insignificant Activities Emission Limits and Standards of the permit. Emissions that are aggregate insignificant emissions established in the permit are exempt from fees.
20. The facility has identified the categorically insignificant activities in Condition 12 and the Aggregate Insignificant Emission Units (EIU) in Condition 18 are subject to a visible emission limit of 20% and a particulate matter emission of 0.14 gr/dscf and a process weight limit for non-fugitive, non-fuel burning process equipment.

### PLANT SITE EMISSION LIMITS

21. Provided below is a summary of the baseline emission rate, netting basis, and plant site emission limits.

| Pollutant <sup>(1) (2)</sup> | Baseline (tons/yr) | Netting Basis      |                    | Plant Site Emission Limit (PSEL) |                         |                         |
|------------------------------|--------------------|--------------------|--------------------|----------------------------------|-------------------------|-------------------------|
|                              |                    | Previous (tons/yr) | Proposed (tons/yr) | Previous PSEL (tons/yr)          | Proposed PSEL (tons/yr) | PSEL Increase (tons/yr) |
| PM                           | 0                  | 0                  | 0                  | 24                               | 24                      | 0                       |
| PM <sub>10</sub>             | 0                  | 0                  | 0                  | 14                               | 14                      | 0                       |

| Pollutant <sup>(1) (2)</sup> | Baseline (tons/yr) | Netting Basis      |                    | Plant Site Emission Limit (PSEL) |                         |                         |
|------------------------------|--------------------|--------------------|--------------------|----------------------------------|-------------------------|-------------------------|
|                              |                    | Previous (tons/yr) | Proposed (tons/yr) | Previous PSEL (tons/yr)          | Proposed PSEL (tons/yr) | PSEL Increase (tons/yr) |
| PM <sub>2.5</sub>            | NA                 | NA                 | 0                  | NA                               | 9                       | 9                       |
| CO                           | 0                  | 0                  | 0                  | 0                                | de minimis              | 0                       |
| NO <sub>x</sub>              | 0                  | 0                  | 0                  | 0                                | de minimis              | 0                       |
| SO <sub>2</sub>              | 0                  | 0                  | 0                  | 0                                | de minimis              | 0                       |
| VOC                          | 0                  | 70                 | 70                 | 70                               | 70                      | 0                       |
| Pb                           | 0                  | 0                  | 0                  | 0                                | de minimis              | 0                       |
| GHG                          | 1,091              | 0                  | 1,091              | NA                               | 74,000                  | 74,000                  |

<sup>1</sup> Facility-wide emission of CO, NO<sub>x</sub>, SO<sub>2</sub> and Pb are less than the de minimis level of 1 tpy and are not required to have a PSEL.

<sup>2</sup> The PSELs for PM, PM<sub>10</sub>, and PM<sub>2.5</sub> are set at the Generic PSEL Levels in accordance to LRAPA 42-0040 and 42-0041. The actual capacities to emit these pollutants are 2 tons/year for PM and 1.25 tons/year for PM<sub>10</sub> and PM<sub>2.5</sub>.

- 21.a. Baseline emissions rates (BERs) have been set at zero (0) tons per year for all criteria pollutants since the facility was not in operation during the 1978 baseline year. The BER for GHG was set using the combustion limits of 200,000 therms per year for all combustion units, based on 2006 data.
- 21.b. The PSEL for PM, PM<sub>10</sub> and PM<sub>2.5</sub> are set at the generic PSEL levels in accordance with Title 42-0040(1) and the netting basis for each pollutant is set at zero (0) in accordance with Title 42-0040(2) and (3).
- 21.c. A baseline emission rate was not required for PM<sub>2.5</sub> in accordance with the definition of “baseline emission rate” in LRAPA Title 12.
- 21.d. The capacity to emit NO<sub>x</sub>, SO<sub>2</sub> and CO, from EU-IEU combustion units have a combined input of 4.85 MMBtu/hour and if based on 8,760 hours of operation the emissions for NO<sub>x</sub> and CO are over the de minimis, but the facility has limited the total combustion of natural gas to 200,000 therms per year. The facility-wide limit on natural gas usage keeps the NO<sub>x</sub>, SO<sub>2</sub> and CO emissions below the de minimis. Therefore, PSELs are not required for these pollutants.

**UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS**

22. The facility does not have any unassigned emissions or emission reduction credits at this time.

**SIGNIFICANT EMISSION RATE**

23. The Plant Site Emission Limit increase over the netting basis is less than the Significant Emission Rate (SER) as defined in LRAPA Title 12 for all of the pollutants as shown below:

| Pollutant         | SER (tons/year) | Requested Increase Over Previous Netting Baseline | Increase above original netting basis due to physical changes in the method of operation | Increase Due to Physical Changes or Changes in the Method of Operation |
|-------------------|-----------------|---|--|--|
| PM                | 25              | 24  | 0  | 0  |
| PM <sub>10</sub>  | 15              | 14  | 0  | 0  |
| PM <sub>2.5</sub> | 10              | 9   | 0  | 0  |
| CO                | 100             | 0   | 0  | 0  |

| Pollutant       | SER<br>(tons/year) | Requested Increase<br>Over Previous<br>Netting Baseline | Increase above<br>original netting basis<br>due to physical<br>changes in the method<br>of operation | Increase Due to<br>Physical Changes or<br>Changes in the<br>Method of Operation |
|-----------------|--------------------|---|--|---|
| NO <sub>x</sub> | 40                 | 0   | 0  | 0   |
| SO <sub>2</sub> | 40                 | 0   | 0  | 0   |
| VOC             | 40                 | 0   | 0  | 0   |
| Pb              | 0.6                | 0   | 0  | 0   |
| GHG             | 75,000             | 72,909  | 0  | 0   |

**TITLE V PERMIT CONDITIONS RENEWAL CHANGES**

24. The following is a list of condition-by-condition changes between the previous permit and the proposed permit:

| New Permit<br>Condition<br>Number | Old Permit<br>Condition<br>Number | Description of change  | Reason for change  |
|-----------------------------------|-----------------------------------|--|--|
| Most                              | Most                              | Updated and corrected rule references  | LRAPA rule changes, typos, etc.  |
| Cover page                        | Cover page                        | Updated: Information Relied Upon   | To reflect the renewal application supplied on 6/9/15  |
| Cover page                        | Cover page                        | Updated: Responsible Official and Facility Contact Person  | To reflect the new Responsible Official to Vice President of Operation and the new Facility Contact Person to Kyle Bressler and Title to Vice President of Operations.   |
| Page 5                            | Page 5                            | Updated “Modified EPA Method 9” language   | Updated to be consistent with amended opacity regulations  |
| 1                                 | 1                                 | Installed LRAPA regulation reference   | Standard practice to update or install regulation references that are required.  |
| 2                                 | 2                                 | Updated condition numbers that are LRAPA or DEQ only enforceable   | Changes in condition numbers and regulations from current permit to renewal permit.  |
| 3                                 | 3                                 | Removed EU-3 for combustion unit and they are now identified as Insignificant Emission Units (IEU)                 | The facility requested a limit on natural gas combustion to keep the emissions under the de minimis level. Since there is a combustion limit that keeps them under the de minimis level, then they do not need to be identified as EU-3. |
| 4                                 | 4                                 | Updated condition language, added language about fugitive emission control plan, and updated regulation references | To reflect updated regulation language to be consistent with LRAPA Title 48 amended 01/11/18.  |
| 5                                 | 5 & 6                             | Update condition language and regulation references  | To reflect updated regulation language to be consistent with LRAPA Title 48 amended 01/11/18.  |
| 6                                 | 7 & 9                             | Updated condition language and incorporated monitoring and recordkeeping of Condition 9 into Condition 7           | This is consistent with standard permit template condition format.   |

| New Permit Condition Number | Old Permit Condition Number | Description of change  | Reason for change   |
|-----------------------------|-----------------------------|--|---|
| 7                           | 8 & 9                       | Updated condition language and installed monitoring and recordkeeping condition. | This is consistent with standard permit template condition format.  |
| 8                           | 10                          | No change  | NA  |
| --                          | 11                          | Removed from the permit  | This condition is now Attachment 1: Air Pollution Emergencies   |
| 9                           | 12                          | No change  | NA  |
| 10                          | 53                          | Updated condition language and regulation reference                              | This is consistent with standard permit template language format.   |
| 11                          | --                          | Installed combustion limit and regulation reference                              | Combustion limit for natural gas used in boilers and heaters  |
| 12 & 12.a                   | 54 & 55.a                   | Updated language and placed conditions together to make condition more cohesive  | Updated the monitoring language and installed parameter that must be recorded to be compliant with monitoring requirement.                        |
| 12.b-12.f                   | 56.b-56.f                   | Installed PM <sub>2.5</sub> into these conditions                                | Added PM <sub>2.5</sub> because it is now considered a criteria pollutant and must be calculated for the PSEL                                     |
| 13                          | 13                          | Updated condition language and regulation reference                              | Updated language and regulation reference to reflect change to Title 32 amended on 01/11/18   |
| 14                          | 15                          | Updated condition language and regulation reference and added DEQ reference.     | Updated language to reflect amended regulation language and updated LRAPA and added DEQ regulation references.                                    |
| 15                          | 16                          | Updated condition language and installed regulations references                  | Update language to be consistent with standard permit template language.  |
| 16                          | 17                          | Updated condition language and installed regulation references                   | Update language to be consistent with standard permit template language and added references.   |
| 17                          | 14                          | Updated condition language and installed regulation references.                  | Update language to be consistent with standard permit template language and EPA Methods and added references.                                     |
| 18                          | 14.f                        | Made into its own recordkeeping condition and installed regulation references    | This is a recordkeeping condition that needed have be taken from its sub-condition placement. Regulation references for recordkeeping were added. |
| 19                          | --                          | Installed the applicable requirements for NESHAP Subpart JJ                      | Applicability condition are standard permit template language   |
| 20                          | --                          | Installed the applicable requirements for NESHAP Subpart JJ                      | Applicability conditions are standard permit template language  |
| 21                          | 18, 22, & 25                | Updated condition language and combined conditions                               | Updated language and combined conditions to original federal NESHAP language and format.  |
| 22                          | --                          | Installed the applicable requirements for NESHAP Subpart JJ                      | Applicability condition are standard permit template language   |

| New Permit Condition Number | Old Permit Condition Number | Description of change  | Reason for change  |
|-----------------------------|-----------------------------|--|--|
| 23                          | 28                          | Updated condition language   | Updated language and separated condition into sub-conditions to original federal NESHAP language and format.   |
| 24                          | 29                          | No change  | NA   |
| 25                          | 30                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 26                          | 31                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 27                          | 32                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 28                          | 33                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 29                          | 34                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 30                          | 35                          | Removed all sub-conditions referring to touchup and repair, and monitoring and recordkeeping condition references. | Removed touchup and repair sub-condition because 40 CFR 63, Subpart JJ was amended on 11/21/11 and these were removed from the Subpart. Updated language to original federal NESHAP language and format. |
| 31                          | 36                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 32                          | 37                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 33                          | 38                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 34                          | 39                          | Removed monitoring and recordkeeping condition reference.  | Removed condition reference to monitoring and recording because it is not part of the federal regulation condition.  |
| 35                          | 19                          | No change  | NA   |

| New Permit Condition Number | Old Permit Condition Number | Description of change   | Reason for change   |
|-----------------------------|-----------------------------|---|---|
| 36                          | 23                          | Updated condition language  | Updated condition language to original federal NESHAP language and format   |
| 37                          | 21, 24, 27, & 41            | Combined conditions, added required conditions, removed reference to 40 CFR 63.804(f), and updated condition language | Combined conditions, added conditions and updated language to be consistent with Subpart JJ. Removed 40 CFR 63.804(f) reference because Lanz has fulfilled their Initial Notification obligation.   |
| 38                          | --                          | Added condition   | This condition is applicable to the source and therefore, needed to be incorporated into the permit.  |
| 39                          | 42                          | Updated condition language  | Updated condition language to original federal NESHAP language and format   |
| 40                          | 20, 23 & 26                 | Combined conditions and updated condition language and removed some sub-conditions                                    | Combined similar condition and updated condition language to original Subpart JJ language. Removed sub-condition that were not part of 40 CFR 63.806(b) condition.                                  |
| 41                          | --                          | Added condition   | This condition was incorporated because it is applicable to the source through Subpart JJ.  |
| 42                          | 20                          | Separated from current condition and update condition language  | This condition was separated from its current condition to be a stand-alone condition as it is in Subpart JJ. Updated the condition language to original federal NESHAP language and format.        |
| 43                          | 40.a., b., c., k., & l.     | Separated from current condition and updated condition language   | These sub-conditions were separated from the current condition to be a stand-alone condition as it is in Subpart JJ. Updated the condition language to original federal NESHAP language and format. |
| 44                          | 40.m.                       | Separated from current condition and updated language   | This sub-condition was separated from its current condition to be a stand-alone condition as it is in Subpart JJ. Updated the condition language to original federal NESHAP language and format.    |
| 45                          | 40.n.                       | Separated from current condition and updated language   | This sub-condition was separated from its current condition to be a stand-alone condition as it is in Subpart JJ. Updated the condition language to original federal NESHAP language and format.    |
| 46                          | --                          | Added condition   | This is an applicable to the source through Subpart JJ, though the facility is compliant with this condition  |

| New Permit Condition Number | Old Permit Condition Number | Description of change                              | Reason for change  |
|-----------------------------|-----------------------------|--|--|
|                             |                             |  | through current permit conditions 52 & 66.   |
| 47                          | --                          | Added condition                                    | This condition was incorporated because it is applicable to the source through Subpart JJ.   |
| 48                          | --                          | Added condition                                    | This condition was incorporated because it is applicable to the source through Subpart JJ.   |
| 49                          | --                          | Added condition                                    | This condition was incorporated because it is applicable to the source through Subpart JJ.   |
| 50                          | 51                          | Updated condition language                         | Removed monitoring, recordkeeping, and emission calculation referencing because those are included in the BACT Section of the permit.    |
| 51                          | 52.b & 52.d                 | Separated sub-conditions and updated language      | Separated these current sub-conditions to be a stand-alone monitoring condition. This is to be consistent with permit template language. |
| 52                          | 52.a., & 52.c.              | Separated sub-conditions and updated language      | Separated these current sub-conditions to be a stand-alone monitoring condition. This is to be consistent with permit template language. |
| 53                          | 47                          | Updated condition language and regulation citation | Updated language and update regulation citation to reflect the adoption of amended regulation 01/11/18.                                  |
| 54                          | 48                          | No change  | NA   |
| 55                          | 57                          | No change  | NA   |
| 56                          | 58                          | Update regulation citation                         | Added Federal regulation 40 CFR 60.8(d) and (f).   |
| 57                          | 59                          | No change  | NA   |
| 58                          | 60                          | Updated condition language                         | Updated condition language to be consistent with permit template language.   |
| 59                          | 61                          | Updated condition language                         | Updated condition language to be consistent with permit template language.   |
| 60                          | 63                          | No change  | NA   |
| 61                          | 64                          | No change  | NA   |
| 62                          | 65                          | No change  | NA   |
| 63                          | 66                          | No change  | NA   |
| 64                          | 67                          | No change  | NA   |
| 65                          | 68                          | No change  | NA   |
| 66                          | 69                          | Updated condition language                         | Updated condition language to be consistent with permit template language.   |

| New Permit Condition Number   | Old Permit Condition Number   | Description of change  | Reason for change   |
|-------------------------------|-------------------------------|--|---|
| 67                            | 70                            | Updated condition language   | Updated condition language to be consistent with permit template language.  |
| 68                            | 72                            | No change  | NA  |
| 69                            | 71                            | Updated regulation citation  | Updated regulation citation   |
| 70                            | --                            | Incorporated GHG registration and reporting requirement.   | New regulated pollutant.  |
| 71                            | 73                            | Updated condition language   | Updated language to be consistent with permit template language.  |
| 72                            | 74                            | Removed language referring to "Air Pollution Episode".   | Air Pollution Episode has been removed from the standard permit language.   |
| 73                            | 75                            | Updated condition language   | Updated language to be consistent with permit template language.  |
| 74                            | 77                            | Updated condition language   | Updated condition language to be consistent with permit template language and removed all references of Initial Notification                                      |
| 75                            | 76                            | No change  | NA  |
| 76                            | 78                            | Updated condition language   | Updated condition language to be consistent with 40 CFR 63.9(j) and inserted the date that LRAPA received the Initial Compliance Status Report                    |
| 77                            | 79                            | No change  | NA  |
| 78                            | --                            | Installed condition with a table containing requirements that are not applicable to the facility | Required by rule (OAR 340-218-0050(3)(c)), the permit must contain a list of non-applicable requirements that could reasonably be considered as being applicable. |
| General Conditions G1. - G29. | General Conditions G1. - G27. | Installed Masking and Concealment condition into General Conditions.                             | Standard permit template language   |

**FEDERAL REQUIREMENTS**

25. The applicability of various federal requirements is as follows:

- 25.a. **Accidental Release:** If the facility becomes subject to 40 CFR Part 68, the facility would be required to provide a risk management plan for toxic and flammable substances releases.
- 25.b. **NESHAP/MACT:** The following National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, requirements are applicable to this facility:
  - 25.b.i. NESHAP: Wood Furniture Manufacturing Operations (Subpart JJ) is applicable to this facility (EU: EU-2) and all requirements have been incorporated into the permit.

**STRATOSPHERIC OZONE DEPLETING REQUIREMENTS**

26. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended. Sections 601-618 of the act do to apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

**MONITORING REQUIREMENTS**

27. Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. In addition, the permit includes monitoring of operating parameters for other emission units and pollution control devices. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit.

The facility is required to record material production and throughput totals and to estimate actual emissions. The estimations are to be based upon production data, emission factors and estimation methods used in the facility's application or other LRAPA approved method.

Facility-wide:

The federal regulation applicable to the facility-wide monitoring and recording associated with the resin manufacturing operations.

| Federal Regulation   | Emission Unit(s) Applicable                        |
|----------------------|--|
| 40 CFR 63 Subpart JJ | Wood Furniture Manufacturing Operations (EU: EU-2) |

PSELS and Emission Unit Specific Monitoring:

PSELS must be monitored on a 12-month rolling year based on the maintaining records for the process parameters in the table below:

PSEL Monitoring Parameters

| Emission Unit/Process         | Process Parameter       | Pollutant                                    |
|-------------------------------|-------------------------|--|
| Sawdust Handling System: EU-1 | Baghouse throughput     | PM, PM <sub>10</sub> , and PM <sub>2.5</sub> |
| Surface Coater: EU-2          | Mass Balance Parameters | VOC and VHAPs                                |

| Emission Unit/Process   | Process Parameter   | Pollutant  |
|---|---|--|
|   | Coatings, solvents, adhesives, and offsite sludge   |  |
|   | Quantity in gallons   |  |
|   | Density in lb/gallon  |  |
|   | VOC/HAP content, % by weight  |  |
| PM/PM <sub>10</sub> /PM <sub>2.5</sub> – Surface Coaters and Natural Gas Combustion Units: EU-IEU | Throughput of coatings, solvents, adhesives, etc., sprayed in surface coaters and natural gas usage | PM, PM <sub>10</sub> , and PM <sub>2.5</sub> , NO <sub>x</sub> , CO, VOC and SO <sub>2</sub> |

The emission unit specific monitoring section contain unique monitoring conditions applicable to each individual emission units:

EU-1 – Sawdust Handling System: Monthly monitoring of the inspections and maintenance of the baghouse and at least quarterly, performing visible emission surveys of the baghouse.

EU-2 – Surface Coaters (VOC Emissions): Monthly, demonstrate continuous compliance with the VOC and VHAPs limits by calculating average VHAP and VOC. Through records demonstrating compliant finishing materials for HVAP.

IEU – Insignificant Emission Units: Monthly provide calculations on PM, PM<sub>10</sub>, and PM<sub>2.5</sub> emissions from the baghouse through calculations. Monitor natural gas throughput on a 12 monthly rolling total, to demonstrate maintaining the yearly throughput limit.

**COMPLIANCE ASSURANCE MONITORING**

28. 40 CFR 64: Compliance Assurance Monitoring (CAM) has been evaluated for the facility’s the baghouse for the Sawdust Handling System (EU-1) and it was determined that the emission unit baghouse is not applicable to CAM. To be applicable to CAM the emission unit must be applicable to the emission limitation or standard, use a control device to achieve compliance with the limitation or standard, and must have a pre-control emission over 100 tons per year of any criteria pollutant.

| Pollutants                                   | Does EU-1 emit over 100 tons of the Pollutant per year | Does the EU-1 have a Control Device for this Pollutant | Is there an Emission Limitation or Standard for this Pollutant | Is EU-1 Subject to CAM for the Pollutant |
|--|--|--|--|--|
| PM, PM <sub>10</sub> , and PM <sub>2.5</sub> | No   | Yes  | No   | No                                       |

**COMPLIANCE HISTORY**

29. Lanz has a Full Compliance Evaluation (FCE) conducted every 2 years. The following table indicates the FCE history of this facility since the issuance of the last Title V Operation Permit on May 28, 2010.

| Type of Inspection         | Date            | Results       |
|----------------------------|-----------------|---------------|
| Full Compliance Evaluation | 07/15/2011      | In compliance |
| Full Compliance Evaluation | 07/09 & 10/2013 | In compliance |
| Full Compliance Evaluation | 08/05/2015      | In compliance |
| Full Compliance Evaluation | 08/31/2017      | In compliance |

30. Enforcement Actions:

- 30.a. On December 16, 2015, Lanz received a Notice of Non-Compliance (NON No. 3531) for failure to submit the Title V Operating Permit renewal application 12 months prior to the expiration date of June 9, 2015 and operating a Title V facility without a permit on the basis for failure to submit a timely renewal application. On February 12, 2016, Lanz received a Stipulated Final Order (SFO No. 15-3531), civil penalties in the sum of \$2,800 for the violations.
- 30.b. On July 31, 2008, Lanz received a Notice of Non-Compliance (NON No. 3040) for failure to submit and receive appropriate approval to construct and a modification to the Title V operating permit for installation of a coating line and baghouse for Phase III of the facility. On December 4, 2008, Lanz received a Stipulated Final Order (SFO No. 08-3040) with a civil penalty of \$2,426 for violations.
- 30.c. On May 15, 1998, Lanz received a Notice of Non-Compliance (NON No. 1534) for failure to submit a construction review and for failure to submit an application for an ACDP. On January 24, 2000, Lanz received a Stipulated Final Order (SFO No. 00-1534) with a civil penalty of \$4,466 for the violations.

31. Complaints:

- 31.a. There have been no complaints received by LRAPA during this permitting term.

**GENERAL TESTING REQUIREMENTS**

- 32. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntary conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

**SOURCE TEST RESULTS**

- 33. The facility has not had a source test done, nor has a source test been required to be conducted a source test on any emission units.

**RECORDKEEPING REQUIREMENTS**

- 34. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions. The records of all monitoring specified in the Title V permit must be kept at the plant site for at least 5 years.

**REPORTING REQUIREMENTS**

- 35. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a logbook attached to the annual report. Emissions fees reports are required annually.

**PUBLIC NOTICE**

- 36. This draft permit will be on public notice from June 17, 2019 to June 22, 2019. Written comments may be submitted during the 35-day public comment period. LRAPA will hold a public hearing if requested by 10 or more

individuals or one person representing a group of 10 or more individuals. After the comment period and hearing, if requested, LRAPA will review the comments and modify the permit as may be appropriate. A proposed permit will then be sent to EPA for a 45-day review period. LRAPA may request and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period.

If the EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objects to the permit that were raised with reasonable specificity during the public comment period provided for in OAR-340-218-0210, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

#### **EPA REVIEW**

37. [Will be updated after EPA's Review]

BE/cmw  
6/12/2019

**CALCULATION DETAIL SHEET**

**PM, PM<sub>10</sub>, & PM<sub>2.5</sub> Emissions – Plant-wide**

| Process Description                             | Emission Unit ID | Operating Parameters                           | Emission Factor  | Reference                        | Process Emissions (tpy) |
|---|------------------|--|--|----------------------------------|-------------------------|
| Sawdust Handling*                               | EU-1             | 4000 BDT/yr baghouse throughput                | 0.50 lb/BDT (assumes 99.97% efficiency)                        | Engineering Estimates and DEQ EF | 1.0                     |
| <b>Insignificant Emission Units</b>             |                  |  |  |                                  |                         |
| Surface Coaters                                 | EU-2 as IEU      | 19,000 lbs coating (2000 gallons @ 9.5 lb/gal) | 0.0004 lb coating (99.8% filter efficiency with 20% overspray) | Engineering Estimates            | 0.004*                  |
| Natural Gas Combustion                          | IEU              | <200,000 therms/yr                             | 0.00025 lb/therm   | DEQ EF                           | 0.025                   |
| Aggregate Insignificant Emissions Total for fee |                  |  |  |                                  | 1.0                     |
| Total   |                  |  |  |                                  | 2.0                     |

\*Emission factors for PM, engineering estimates were uses and PM<sub>10</sub> and PM<sub>2.5</sub>, DEQ AQ-EF03 (Sawmills) as a percentage of PM to PM<sub>10</sub> and PM<sub>2.5</sub> were used to derive total PM<sub>10</sub> and PM<sub>2.5</sub> emissions from emission unit EU-1: Sawdust Handling.

**CO Emissions – Plant-wide**

| Process Description    | Emission Unit ID | Operating Parameters | Emission Factor | Reference | Process Emissions (tpy) |
|------------------------|------------------|----------------------|-----------------|-----------|-------------------------|
| Sawdust Handling       | EU-1             | NA                   | NA              | NA        | NA                      |
| Surface Coaters        | EU-2             | NA                   | NA              | NA        | NA                      |
| Natural Gas Combustion | IEU              | <200,000 therms/yr   | 0.0084 lb/therm | DEQ EF    | 0.84                    |
| Total                  |                  |                      |                 |           | 0.84                    |

\*CO totals is less than or equal to 1 tpy and therefore, CO is considered de minimus and considered insignificant for these emissions units.

**NO<sub>x</sub> Emissions – Plant-wide**

| Process Description    | Emission Unit ID | Operating Parameters | Emission Factor | Reference | Process Emissions (tpy) |
|------------------------|------------------|----------------------|-----------------|-----------|-------------------------|
| Sawdust Handling       | EU-1             | NA                   | NA              | NA        | NA                      |
| Surface Coaters        | EU-2             | NA                   | NA              | NA        | NA                      |
| Natural Gas Combustion | IEU              | <200,000 therms/yr   | 0.01 lb/therm   | DEQ EF    | 1.0                     |

| Process Description | Emission Unit ID | Operating Parameters | Emission Factor | Reference | Process Emissions (tpy) |
|---------------------|------------------|----------------------|-----------------|-----------|-------------------------|
| Total               |                  |                      |                 |           | 1.0                     |

\*NO<sub>x</sub> totals are less than or equal to 1 tpy and therefore, NO<sub>x</sub> is considered de minimus and considered insignificant for these emissions units.

**SO<sub>2</sub> Emissions – Plant-wide**

| Process Description    | Emission Unit ID | Operating Parameters | Emission Factor  | Reference | Process Emissions (tpy) |
|------------------------|------------------|----------------------|------------------|-----------|-------------------------|
| Sawdust Handling       | EU-1             | NA                   | NA               | NA        | NA                      |
| Surface Coaters        | EU-2             | NA                   | NA               | NA        | NA                      |
| Natural Gas Combustion | IEU              | <200,000 therms/yr   | 0.00017 lb/therm | DEQ EF    | 0.017                   |
| Total                  |                  |                      |                  |           | 0.017                   |

\*SO<sub>2</sub> totals are less than or equal to 1 tpy and therefore, SO<sub>2</sub> is considered de minimus and considered insignificant for these emissions units.

**VOC Emissions – Plant-wide**

| Process Description    | Emission Unit ID | Operating Parameters                           | Emission Factor                            | Reference                | Process Emissions (tpy) |
|------------------------|------------------|--|--|--------------------------|-------------------------|
| Sawdust Handling       | EU-1             | NA   | NA   | NA                       | NA                      |
| Surface Coaters        | EU-2             | 19,000 lbs coating (2000 gallons @ 9.5 lb/gal) | Mass Balance Calculations for each coating | SDS, ESDS, CPDS, or MSDS | 69                      |
| Natural Gas Combustion | IEU              | <200,000 therms/yr                             | 0.00055 lb/therm                           | DEQ EF                   | 0.055                   |
| Total                  |                  |  |  |                          | 70.0                    |

\* VOC totals are less than or equal to 1 tpy and therefore, VOC is considered de minimus and considered insignificant for these emissions units.