

LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
(541) 736-1056

SIMPLE AIR CONTAMINANT DISCHARGE PERMIT (SIMPLE 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:
Whittier Wood Products Company
3787 West First Avenue
Eugene, Oregon 97402

Mailing Address:
P.O. Box 2827
Eugene, Oregon 97402

Permit Number: 208894
Permit Type: Simple
SIC: 2511 – Wood Household Furniture
Issuance Date: <Date>
Expiration Date: <Date>

Information Relied Upon:
Application Number: 61463
Dated: April 20, 2016

Land Use Compatibility Statement:
From: City of Eugene
Date: July 18, 2001

Fee Basis:
Title 37, Table 1, Part B:
69 – Surface coating operations: coating operations whose actual or expected usage of coating materials is greater than 250 gallons per month.

Permitted Sources:
4 Paint Booths

DRAFT

Issued

By: _____
Merlyn L. Hough, Director

Effective

Date: _____

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge exhaust gases containing 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 regulated by this permit are the following:

| Emission Unit | Emission Units ID | Pollution Control Device |
|--|-------------------|---|
| Furniture Coating Operations: 4 Paint Booths | Booths | Spray Booth Filters |
| Aggregate Insignificant Activities: Furniture Millwork – Sawdust Handling | IEU | Indoor portable dust collection systems |

Plant Site Emission Limits (PSELs)

3. The total emissions from the operation must not exceed the annual (12-month rolling) limits below: [LRAPA 42-0040]

Annual (12-Month Rolling) PSELs
(tons per year)

| Pollutants | VOC | Single HAP | Combined HAPs |
|------------|-----|------------|---------------|
| Totals | 39 | 9 | 24 |

Any changes in operation that may increase the emissions above the PSELs must be approved by LRAPA. Failure to do so may result in enforcement actions being taken by LRAPA. [LRAPA 37-0020]

PSEL Monitoring and Compliance

4. **By the fifteenth working day of each month**, the permittee must determine compliance with the previous 12 consecutive calendar month VOC and HAP PSELs in accordance with the following procedures. All of the VOC and HAP content of the coatings is assumed to be emitted to the atmosphere. The 12 consecutive calendar month total must be determined by summing the total VOC and HAP emissions from the previous 12 consecutive calendar months. The permittee must maintain usage records of all materials that contain VOC and HAP(s) in accordance with Condition 11. [LRAPA 34-016 and 42-0080(4)(c)]
 - 4.a. The permittee must calculate the total calendar month emissions of VOCs and individual HAPs using the following equation:

Equation 1

$$E_m = \left[\sum_{i=1}^n U_i \cdot C_i \right] / 2000$$

| | | | |
|--------|--------|---|--|
| Where: | E_m | = | Total calendar month VOC or individual HAP emissions from all of the VOC or individual HAP-containing materials (in tons); |
| | \sum | = | Symbol representing "summation of"; |
| | U_i | = | Total usage of an individual material for a calendar month, in gallons or pounds, as applicable; |
| | C_i | = | Actual mass of VOC or an individual HAP in an individual material, in pounds per gallon or percent by weight, as applicable; |
| | i | = | Each individual VOC or HAP-containing material; |
| | n | = | Total number of pounds in a short ton. |

- 4.b. The permittee must calculate the 12 consecutive calendar month emissions from the use of VOC and individual HAP-containing materials using the following equation:

Equation 2

$$E_{12} = \sum_{i=1}^{12} Em_i$$

| | | | |
|--------|----------|---|--|
| Where: | E_{12} | = | Total emissions of all VOCs or individual HAPs over the previous 12 consecutive calendar months, in tons; |
| | \sum | = | Symbol representing "summation of"; |
| | Em_i | = | Total VOC or individual HAP emissions during each of the previous 12 consecutive months in tons, as calculated using Equation 1; and |
| | i | = | Each calendar month; |

- 4.c. The permittee must calculate 12 consecutive calendar month emissions from the aggregate use of HAP-containing materials using the following equation:

Equation 3

$$E_{12} = \sum_{i=1}^n E_{12i}$$

| | | | |
|--------|-----------|---|---|
| Where: | E_{12} | = | Total emission aggregate HAP emissions over the previous 12 consecutive calendar months, in tons; |
| | \sum | = | Symbol representing "summation of"; |
| | E_{12i} | = | Total emissions of an individual HAP emitted by the facility over |

- the previous 12 consecutive calendar months, in tons, as calculated using Equation 2;
- i = Each individual HAP emitted by the facility over the previous 12 consecutive calendar months; and
- n = Total number of individual HAPs emitted by the facility over the previous 12 consecutive calendar months.

5. The permittee must use the maximum VOC or maximum individual HAP content for each individual material provided in each Safety Data Sheets (SDS) or equivalent documentation. For SDS that provide a range of values for VOC content or individual HAP content, the highest value must be used in the emission calculation. [LRAPA 34-016]

Performance Standards and Limitations

6. The permittee must comply with the following operational and work practice requirements for EU-Booths: [LRAPA 32-007(1)]
- 6.a. All spray-applied coatings must be applied in a paint booth fitted with filters demonstrated to achieve at least 98% capture of paint overspray. The permittee may use published filter efficiency data provided by the filter vendors to demonstrate compliance with this requirement;
- 6.b. All spray-applied coatings must be applied using high volume, low pressure (HVLP) spray gun technology. The permittee may use an equivalent spray coating application technology that is demonstrated to achieve a transfer efficiency comparable to HVLP spray coating application technology for which written approval has been obtained from LRAPA prior to use;
- 6.c. All manual spray gun system cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent;
- 6.d. Certify that all personnel, including contract personnel, who spray apply surface coatings, are trained the proper spray application of surface coatings and the proper setup and maintenance of spray equipment; and
- 6.e. Ensure that storage containers used for VOC-containing materials are kept closed at all times except when adding or removing materials.
7. The permittee must update, as needed, an Inspection and Maintenance Plan (I&M Plan) for the paint booths and sawdust handling operations. If the I&M Plan is updated, the permittee must submit the updated copy to LRAPA for review. If LRAPA determines the plan is deficient, LRAPA may require the permittee to amend the plan. At minimum, the I&M Plan must include inspection schedules for the paint booth and associated dry filters used to control overspray, and sawdust collection and control. The I&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repair or maintenance are necessary. [LRAPA 32-007(1)]
8. The permittee must take reasonable precautions to prevent fugitive dust emissions from leaving the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured by EPA Method 22 with the minimum observation time of at least six (6) minutes. Reasonable precaution includes: [LRAPA 48-015(2)(a) & (b)]
- 8.a. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials; and

- 8.b. Developing an LRAPA approved fugitive emission control plan upon request by LRAPA if the above precautions are not adequate and implementing the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.

Monitoring, Recordkeeping, and Reporting Requirements

9. The permittee shall conduct dust suppression measures such as, but not limited to, cleaning around bins and equipment and shall operate all air contaminant generating processes so that fugitive dust associated with the operation will be adequately controlled at all times. [LRAPA 48-015]
10. All plant processes equipment and all air contaminant collection and disposal facilities, including the paint booth filters, shall be operated and maintained at all times in a manner which shall minimize air contaminant discharges. [LRAPA 32-005]
11. The permittee must monitor and maintain records for a period of five (5) years from the date of entry of the following information: [LRAPA 34-016 and 42-0080]
- 11.a. Monthly usage of all VOC/HAP-containing materials and emission control system parameters according to the following:

| Activity | Parameter | Units | Recording Frequency |
|--|-------------------------------|-------------------|--|
| VOC/HAP-containing Material Usage | Material Usage | Gallons or Pounds | Monthly |
| VOC/HAP-containing Material Usage | Density of Material | Pounds per Gallon | Maintain current information at all times |
| VOC-containing Material Usage | VOC Content | % By Weight | Maintain current information at all times |
| HAP-containing Material Usage | Individual HAP Content | % By Weight | Maintain current information at all times |
| Paint Booth Filter Particulate Matter Control Efficiency | Control Efficiency | % | Maintain documentation from each manufacturer |
| Spray Application Training | Training Logs / Certification | NA | Maintain documentation of program/training for spray coating personnel |
| Paint Booth Inspections | Occurrence | NA | Each Inspection |
| Paint Booth Filter Replacement | Occurrence | NA | Upon Replacement |
| Inspection and Maintenance Plan | Document | NA | Maintain the current version on-site |

- 11.b. VOC/HAP-containing materials include, but are not limited to, coatings, lacquers, thinners, stains, topcoats, solvents, adhesives, cleaning, and wash-off materials.
- 11.c. The density and VOC/HAP content information must be supplied from Safety Data Sheets (SDS) or equivalent documentation provided by the manufacturer/supplier of the VOC/HAP containing material.

Reporting Requirements

12. The permittee must submit an annual report to document compliance with the PSEs by **February 15th each year**. The summary must contain VOC/HAP emissions data as required per Condition 4.
13. The permittee must also submit with the annual report any information required by General Permit Conditions G15. [LRAPA 35-0160]
14. Within 30 days of updating the Inspection and Maintenance (I&M) Plan, the permittee must submit the updated copy to LRAPA for approval. [LRAPA 32-007]
15. Unless otherwise specified, all reports, notifications, etc., required by the above terms and conditions must be reported to the following office: [LRAPA 34-016]

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

Fee Schedule

16. In accordance with adopted regulations, the permittee will be invoiced for the annual permit fees on **October 1st**, with fees due on **December 1st** of each year. [LRAPA 37-8020 Table 2]

BAE/cmw
6/17/2019

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. [LRAPA 37-0020(3)]
- G2. The permittee shall 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 shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]
- G5. No person shall 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 shall 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 shall 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 shall 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. [LRAPA 32-050(2)]
- G9. The permittee shall 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. [LRAPA 48-015(1)]
- G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public 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. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [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: [LRAPA 36-020(1)]
- a. The owner or operator, of a small source, as defined by LRAPA 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.
 - b. 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.
 - c. 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 shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)(a)]
- G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. The upset log shall include the following: [LRAPA 36-025(3) and 36-030(1)]
- 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 shall be kept by the permittee for five (5) calendar years. [LRAPA 36-02(3)]

Excess Emissions: Scheduled Maintenance

- G16. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution control devices may result in excess emissions, the permittee must obtain prior LRAPA

authorization 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. The application must include the following: [LRAPA 36-015(1)]

- a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions 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 device or system to be maintained;
 - c. identification of the nature of the air contaminants likely to be omitted 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 at all times during the scheduled maintenance.
- G17. No scheduled maintenance associated with the approved procedures in Condition G16 that is likely to cause excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as PM_{2.5} or PM₁₀ 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 shall immediately notify LRAPA by telephone of the situation, and shall 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 alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittee responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

Notification of Construction/Modification

- G20. The permittee must notify LRAPA in writing using an LRAPA "Notice of Intent to Construct" form, or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:
- a. constructing, installing or establishing a new stationary source that will cause an increase in regulated pollutant emissions

- b. making any physical change or changes in the operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. constructing or modifying any pollution control equipment.

Notification of Name Change

- G21. The permittee shall 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 ACDPs. [LRAPA 37-0040(2)(b)]
- G23. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit; [LRAPA 37-0082(1)(a)]
- a. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or
 - b. Another type of permit, ACDP, or Title V, has been issued authorizing operation of the source.
- G24. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)]
- G25. Any permittee 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. [LRAPA 37-0040(4)]

Termination Conditions

- G26. This permit shall be automatically terminated upon: [LRAPA 37-0082(2)]
- 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.

- G27. 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. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60th day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]
- G28. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three (3) months of the permit expiration date. [LRAPA 37-0082(3)]
- G29. 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 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A written request for a hearing must be received by LRAPA within 90 days of service of the notice on the permittee and the request must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and 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. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]
- G30. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

Asbestos

- G31. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 1/12/2018]