



**LANE REGIONAL AIR PROTECTION AGENCY  
TITLE V OPERATING PERMIT**

1010 Main Street, Springfield, Oregon 97477  
(541) 736-1056

Issued in accordance with the provisions of  
ORS 468A.040 and based on the land use compatibility findings included in the permit record.

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**ISSUED TO:**

**Johnson Crushers International**  
86470 Franklin Boulevard  
Eugene, Oregon 97405

**INFORMATION RELIED UPON:**

Application: 64489  
Received: November 14, 2018

**PLANT SITE LOCATION:**

86470 Franklin Boulevard  
Eugene, Oregon 97405

**LAND USE COMPATIBILITY STATEMENT:**

From: Lane County  
Dated: March 23, 2007

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

**DRAFT**

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Steven A. Dietrich, Director

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Effective Date

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Nature of Business: Rock Crushing Equipment Manufacturing  
Primary SIC: 3531 - Construction Machinery and Equipment  
Primary NAICS: 333120 - Mining Machinery and Equipment Manufacturing

**RESPONSIBLE OFFICIAL:**

Title: General Manager

**FACILITY CONTACT PERSON:**

Name: Neil Young  
Title: Safety & Environmental Manager  
Phone: (541) 988-9525

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**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT**

ACDP	Air Contaminant Discharge Permit	NSPS	New Source Performance Standards
AQMA	Air Quality Management Area	NSR	New Source Review
Act	Federal Clean Air Act	O <sub>2</sub>	Oxygen
ASTM	American Society of Testing and Materials	OAR	Oregon Administrative Rules
BACT	Best Available Control Technology	ODEQ	Oregon Department of Environmental Quality
Btu	British thermal unit	OPR	Operation
CAM	Compliance Assurance Monitoring	ORS	Oregon Revised Statutes
CAO	Cleaner Air Oregon	O&M	Operation and maintenance
CEMS	Continuous Emissions Monitoring System	Pb	Lead
CFR	Code of Federal Regulations	PCD	Pollution Control Device
CI	Compression Ignition	PM	Particulate matter
CMS	Continuous Monitoring System	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
CO	Carbon Monoxide	PM <sub>10</sub>	Particulate matter less than 10 microns in size
CO <sub>2</sub>	Carbon dioxide	ppm	Parts per million
CO <sub>2e</sub>	Carbon dioxide equivalent	PSD	Prevention of Significant Deterioration
COMS	Continuous Opacity Monitoring System	PSEL	Plant Site Emission Limit
CPDS	Certified Product Data Sheet	psia	pounds per square inch, actual
CPMS	Continuous parameter monitoring system	PTE	Potential to Emit
DEQ	Department of Environmental Quality	RICE	Reciprocating Internal Combustion Engine
dscf	Dry standard cubic feet	SACC	Semi-Annual Compliance Certification
EF	Emission factor	SCEMP	Surrogate Compliance Emissions Monitoring Parameter
EPA	US Environmental Protection Agency	SCF	Standard cubic foot
EU	Emissions Unit	SER	Significant emission rate
FCAA	Federal Clean Air Act	SERP	Source emissions reduction plan
ft <sup>2</sup>	Square foot	SI	Spark Ignition
FSA	Fuel sampling and analysis	SIC	Standard Industrial Code
GHG	Greenhouse Gas	SIP	State Implementation Plan
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SO <sub>2</sub>	Sulfur dioxide
HAP	Hazardous Air Pollutant as defined by LRAPA Title 12	ST	Source test
HCFC	Halogenated Chloro-Fluoro-Carbons	TACT	Typically Achievable Control Technology
Hr	Hour	TBACT	Toxics Best Available Control Technology
ID	Identification number or label	TPY	Tons per year
I&M	Inspection and maintenance	VE	Visible emissions
Lb	Pound	VMT	Vehicle miles traveled
LRAPA	Lane Regional Air Protection Agency	VOC	Volatile organic compounds
MACT	Maximum Achievable Control Technology	VHAP	Volatile hazardous air pollutant
MM	Million	Year	A period consisting of any 12-consecutive calendar month
MMBtu	Million British thermal units		
NA	Not applicable		
NESHAP	National Emission Standards for Hazardous Air Pollutants		
NO <sub>x</sub>	Nitrogen oxides		

**DEFINITIONS**

Modified EPA Method 9: As used in this permit “Modified EPA Method 9” is defined as follows: Opacity must be measured in accordance with EPA Method 9 using the data reduction procedures in EPA Method 203B. For all standards, the minimum observation period must be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. See also the definition of “Opacity” in LRAPA Title 12.

**PERMITTED ACTIVITIES**

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120 and LRAPA 34-180]
2. All conditions in this permit are federally enforceable and LRAPA enforceable except as noted below:
  - 2.a. Conditions 6, 7, G5, and G9 (LRAPA Title 43) are only enforceable by the state and/or LRAPA. [OAR 340-218-0060]

**EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION**

3. The emissions units regulated by this permit are the following [OAR 340-218-0040(3)]:

**Table 1: Emission Units Description and Pollution Control Devices**

Description	EU ID	Pollution Control Device Description	PCD ID
Paint Booth Operations Paint Booth 290 Paint Booth 390 Paint Booth 491	PBO	Paint Booth Filters	PBF
Metal Fabrication 1 (Bays 1 & 2)	MF-1	None	NA
Metal Fabrication 2 (Bays 3 & 4)	MF-2	Two (2) Baghouses – N & S	BH-N, BH-S
Burn Table 1 - Whitney	BT-1	Baghouse	BH-1
Burn Table 2 - Messer	BT-2	Baghouse	BH-2
Burn Table 3 - Wet	BT-3	Water	NA
Aggregate Insignificant Activities: <ul style="list-style-type: none"> <li>• Paved Road Dust</li> <li>• Booths 290, 390, and 491</li> <li>• Natural Gas Heaters</li> </ul>	AI	None	NA

**EMISSION LIMITS AND STANDARDS**

4. The following tables contain summaries of applicable requirements other than the Plant Site Emission Limits (PSEL), along with the monitoring methods for the emissions units to which those requirements apply.

**Facility-Wide Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
LRAPA 48-015(1)	5	Fugitive Emissions	Minimize	I&M Recordkeeping	5.a
LRAPA 49-010(1), & 32-090(1)	6	Nuisance	Prohibited	Recordkeeping	6.a
LRAPA 32-055	7	PM Fallout	No Deposition of PM >250 µm on Others' Property	I&M Recordkeeping	7.a
LRAPA 32-050	8	Concealment & Masking	Prohibited	I&M Recordkeeping	8.a
40 CFR Part 68	9	Risk Management	Risk Management Plan	NA	9

**Fugitive Emissions**

5. Applicable Requirement: The permittee must not allow any materials to be handled, transported, or stored; or a building, its appurtenances; or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. [LRAPA 48-015(1)]
  - 5.a. Such reasonable precautions must include, but not be limited to the following:
    - 5.a.i. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
    - 5.a.ii. Application of water, or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
    - 5.a.iii. Full or partial enclosure of materials stockpiles in cases where application of water, or other suitable chemicals is not sufficient to prevent particulate matter from becoming airborne;
    - 5.a.iv. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
    - 5.a.v. Adequate containment during sandblasting or other similar operations;
    - 5.a.vi. The covering of moving open bodied trucks transporting materials likely to become airborne; and
    - 5.a.vii. The prompt removal from paved streets of earth or other material which does or may become airborne.
  - 5.b. Monitoring Requirement: At least once each month, the permittee must visually survey the facility using EPA Method 22 for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions, lasting more than 5% of the survey time (or 18 seconds), that leave the plant site. The visible emissions survey may be

conducted simultaneously on multiple emission points when they are in the same field of view for the observer. The person conducting the observation does not need to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including the proper location to observe visible emissions. If sources of excess fugitive emissions are identified, the permittee must: [OAR 340-218-0050(3)(a)]

- 5.b.i. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 5.a, or
- 5.b.ii. Conduct Modified EPA Method 9 within 24 hours.
- 5.c. Recordkeeping: The permittee must maintain a record of the facility inspections including date, time, and determinations made. The record must be maintained onsite for a period of at least five (5) years, and must be provided to LRAPA personnel on request.

### **Nuisance Conditions**

- 6. Applicable Requirement: The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1) and 32-090(1)] This condition is only enforceable by LRAPA.
  - 6.a. Monitoring and Recordkeeping Requirement: The permittee must maintain a record (a log) of all air contaminant complaints received by the responsible official or designated employees (written, received via telephone or facsimile, or verbally communicated). Said log must also record the permittee's actions to investigate, make a determination as to the validity of the complaint, and if valid, resolve the problem within two (2) working days of receiving the complaint or within such longer time (not to exceed five (5) working days) as is reasonably necessary. If more than five (5) days are needed to resolve the problem, the permittee must notify LRAPA immediately upon making that determination. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
- 7. Applicable Requirement: The permittee must not emit particulate matter larger than 250 microns in size at such duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is only enforceable by LRAPA.
  - 7.a. Monitoring Requirement: The permittee must monitor compliance with this applicable requirement using facility inspections required in Condition 5.b. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
- 8. Applicable Requirement: The permittee must not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission of air contaminant which would otherwise violate these rules, or masks the emissions of an air contaminant which causes or tends to cause detriment to health, safety, or welfare of any person. [LRAPA 32-050(1)&(2)]
  - 8.a. Monitoring: Monitoring of compliance with this applicable requirement must be performed using the compliance certification required Condition 38 and 38.b.iii. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]

### **Accidental Release Prevention**

- 9. Applicable Requirement: Should this facility become subject to the accidental release prevention regulations in 40 CFR Part 68, the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10, and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

### **PLANT SITE EMISSION LIMITS**

- 10. Applicable Requirement: The plant site emissions must not exceed the following limits for any 12

consecutive calendar month period: [LRAPA 42-0040, 42-0041]

**Table 3. Plant Site Emission Limits (PSELs)**

Pollutant	Assigned Plant Site Emissions Limits (tons/yr)
PM	24
PM <sub>10</sub>	14
PM <sub>2.5</sub>	9
NOX	39
VOC	39

11. **Monitoring Requirement:** *By the 15<sup>th</sup> of each month* the permittee must determine compliance with the PSELs established in Condition 10 of this permit by conducting monitoring and calculations of each 12-month period in accordance with the following procedures, test methods, and frequencies: [OAR 340-218-0050(3)]

11.a. For VOC containing materials, the permittee must calculate emissions using the following formula:

$$E = \sum (RM \times D \times VOC \times K)$$

Where:

- E = Pollutant emissions in pounds/month and tons/year.
- ∑ = Symbol representing “summation of”
- RM = Raw Material usage in gallons per month and gallons per year;
- D = Density of each Raw Material used in pounds per gallon as obtained from the Safety Data Sheet (SDS) or Certified Product Data Sheet (CPDS);
- VOC = VOC content of the Raw Material by weight fraction as obtained from the SDS or CPDS;
- K = Conversion constant: 1 ton/2,000 lb for annual emissions calculations.

11.b. For PM containing materials and emission units the permittee must calculate emissions using the following formula:

$$E = \sum P_{eu} \times EF_{eu} \times K$$

Where:

- E = Pollutant emissions in pounds/month and tons/year.
- ∑ = Symbol representing “summation of”
- P<sub>eu</sub> = Process parameter (Throughput Type) identified in the Tables below;
- EF<sub>eu</sub> = Emission factor identified for each emissions unit and pollutant in the tables below;
- K = Conversion constant: 1 ton/2,000 lb for annual emissions calculations.

**Table 4. Emission Factors to Be Used for Calculating Emissions**

Emission Unit	Throughput Type [Units]	Emission Factors (lb/throughput unit)		
		PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>
MF-1	Material Collected from BH-N, and BH-S [lb]	1.0204	1.0204	NA
MF-2	Material Collected from BH-N, and BH-S [lb]	0.0204	0.0204	NA
BT-1 & BT-2	Material Collected from BH-1 [lb] and BH-2 [lb]	0.0204	0.0204	NA
BT-1 & BT-2	Hours operated	NA	NA	1.35
BT-3	Hours operated	NA	NA	0.36
MF-1 & MF-2	Welding Wire by [1,000 lb]	15.1	15.1	NA

**Table 5. Emission Factors to Be Used for Calculating Emissions based on potential emissions**

Emission Unit	Throughput Type [Units]	Emission Factors (lb/throughput unit)	
		PM <sub>10</sub>	PM <sub>2.5</sub>
PBO	Paint Booth Particulate – Constant [lb PM <sub>10</sub> /month]	110	110
AI: Paved Road Dust	Constant Time (fugitives) [lb PM <sub>10</sub> /year]	2,000	2,000

- 11.c. If the facility does not record the hours of operation for each Burn Table emission unit (BT-1, BT-2, and BT-3), for any portion of a calendar year, the permittee must use the combined NO<sub>x</sub> PTE of 13.9 tons per year from these emission units for demonstrating compliance with the NO<sub>x</sub> PSEL in Condition 10.
- 11.d. The emission factors listed in Condition 11.b are not enforceable limits unless otherwise specified in this permit. The permittee must use the following emission factors for calculating pollutant emissions, unless alternative emission factors are approved by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided the alternative emission factors are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by LRAPA. The emission factors are not enforceable limits unless otherwise specified in this permit. [LRAPA 34-016]

**EMISSION-UNIT-SPECIFIC EMISSION LIMITS AND STANDARDS**

**Emission Unit – PBO: Specific Emission Limits and Standards**

**Table 6: Emission Unit – Paint Booth Operations [EU: PBO] Specific Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
LRAPA 32-010(1) and 32-010(3)	12	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	12.a
LRAPA 32-015(2)(b)(B)	13	PM	0.14 gr/dscf	Visual Surveys, Reporting, Recordkeeping	13.a



40 CFR 63, Subpart M	14	VOC/HAP	2.6 lb HAP/gal solids	Reporting, Recordkeeping	15
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12. Applicable Requirement(s): The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. The emission standards in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and (3)]
- 12.a. Monitoring Requirement(s): At least monthly, the permittee must conduct a six (6) minute visible emission survey of each emission unit with devices with the potential to emit visible air contaminants to the atmosphere using EPA Method 22 for monitoring pertaining to Condition 12. The visible emission survey may be conducted simultaneously on multiple emission points when they are in the same field of view for the observer. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. Excessive emissions observed using EPA Method 22 are considered to be any visible emission that leave the emission unit boundaries for more than 5% of the survey time. The emission unit boundary is defined as the general location of the permittee's property of the emission unit that includes the emitting device.
- 12.a.i. If any test result exceeds the applicable standard in Condition 12, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable.
- 12.a.ii. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.
- 12.b. Recordkeeping: The permittee must maintain records of the visible emissions surveys, corrective actions (if necessary), and/or the results of any Modified EPA Method 9 tests.
13. Applicable Requirement(s): The permittee must not cause or allow the emission of particulate matter, in excess of 0.14 grains per dry standard cubic foot for any sources installed, constructed or modified after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
- 13.a. Monitoring and Testing: The permittee must demonstrate compliance with Condition 13 by performing the visible emission compliance monitoring required by Condition 12. [LRAPA 35-0120 and OAR 340-218-0050(3)]
14. Applicable Requirement(s): The permittee must limit combined organic HAP emission to the atmosphere from each existing general usage coating affected source to not more than 2.6 lb/gal (0.31 kg/liter) coating solids used during each 12-month compliance period: [40 CFR 63.3890(b)(1)]
15. Monitoring Requirement(s): The permittee must include all coatings (as defined in 40 CFR 63.3981), thinners and/or other additives, and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable emission limit in Condition 14. To make this determination, the permittee must use at least one of the compliance options listed in Conditions 15.a and 15.b. The permittee may apply any of the compliance options to an individual coating operation, or to multiple coating operations as a group, or to the entire affected source. The permittee may use different compliance options for different coating operations, or at different times on the same coating operation. However, the permittee may not use different compliance options at the same time on the same

coating operation. If the permittee switches between compliance options for any coating operations or group of coating operations, the permittee must document this switch as required by 40 CFR 63.3930(c), and the permittee must report it in the next semiannual compliance report required in 40 CFR 63.3920. [40 CFR 63.3891]

- 15.a. *Compliant material option*: Demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Condition 14, and that each thinner and/or other additive, and cleaning material used contains no organic HAP. The permittee must meet all the requirements of 40 CFR 63.3940, 63.3941, and 63.3942 to demonstrate compliance with the applicable emission limit using this option. [40 CFR 63.3891(a)]
- 15.b. *Emission rate without add-on controls option*: Demonstrate that, based on the coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s), the organic HAP emission rate for the coating operation(s) is less than or equal to the applicable emission limit in Condition 14, calculated as a rolling 12-month emission rate and determined on a monthly basis. The permittee must meet all the requirements of 40 CFR 63.3950, 63.3951, and 63.3952 to demonstrate compliance with the emission limit using this option. [40 CFR 63.3891(b)]
16. Monitoring Requirement(s) - *Compliant material option*: [40 CFR 63.3940 – 63.3942]
  - 16.a. The permittee must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during the compliance period by using one of the following five methods: [40 CFR 63.3941(a)]
    - 16.a.i. EPA Method 311. The permittee may count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA defined carcinogens and at 1.0 percent or more for other compounds. The mass fraction of each organic HAP counted must be expressed as a value truncated to four places after the decimal point (e.g., 0.3791). The total mass fraction of organic HAP in the test material is calculated by adding the individual organic HAP mass fractions and truncating the result to three places after the decimal point (e.g., 0.763). [40 CFR 63.3941(a)(1)]
    - 16.a.ii. EPA Method 24. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may use the alternative method contained in appendix A to 40 CFR Part 63 Subpart PPPP rather than EPA Method 24. [40 CFR 63.3941(a)(2)]
    - 16.a.iii. Alternative Method. The permittee may request that the EPA Administrator approve an alternative test method following the procedure in 40 CFR 63.7(f). [40 CFR 63.3941(a)(3)]
    - 16.a.iv. Supplier/Manufacturer Information. The permittee may rely on supplier/manufacturer information if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA defined carcinogens and at 1.0 percent or more for other compounds. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is disagreement between manufacturer's information and the results of a test conducted according to Conditions 16.a.i through 16.a.iii, then the test method results take precedence unless, after consultation, the permittee demonstrates to LRAPA that the formulation data are correct. [40 CFR 63.3941(a)(4)]
    - 16.a.v. Solvent Blends. Where test data and manufacturer's data are not available for solvent blends, the permittee may use the default values listed in Tables 3 and 4 of 40 CFR Part 63 Subpart MMMM. If the tables are used, the values in Table 3 must be used for all solvent blends that match Table 3 entries according to the instructions for Table 3, and Table 4 may be used only if the solvent blends in the materials used do not match any of the solvent blends in Table 3 and the permittee knows only whether the blend is aliphatic or aromatic. However, if the results of an EPA Method 311 are higher than those values

listed in Tables 3 or 4, the Method 311 results will take precedence unless, after consultation, the permittee demonstrates to LRAPA that the formulation data are correct. [40 CFR 63.3941(a)(5)]

- 16.b. The permittee must determine the volume fraction of coating solids for each coating used during the compliance period by using one of the following four methods: [40 CFR 63.3941(b)]
- 16.b.i. ASTM Methods D2697-86 or D6093-97. The permittee may use either method to determine the volume fraction of each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate the volume fraction of coating solids. [40 CFR 63.3941(b)(1)]
- 16.b.ii. Alternative Method. The permittee may request that LRAPA approve an alternative test method following the procedure in 40 CFR 63.7(f). [40 CFR 63.3941(b)(2)]
- 16.b.iii. Supplier/Manufacturer Information. The permittee may rely on supplier/manufacturer information for the volume fraction of the coating. If there is disagreement between manufacturer's information and the results of a test conducted according to Condition 16.b.i, then the test method results take precedence unless, after consultation, the permittee demonstrates to LRAPA that the formulation data are correct. [40 CFR 63.3941(b)(3)]
- 16.b.iv. Calculation of Volume Fraction of Coating Solids. The permittee may determine the volume fraction of coating solids using the following equation: [40 CFR 63.3941(b)(4)]

$$V_s = 1 - (m_{\text{volatiles}} / D_{\text{avg}})$$

where:

$V_s$  = Volume fraction of coating solids, gallon coating solids per gallon coating.

$m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, VOC, water and exempt compounds determined according to EPA Method 24, lbs volatile matter per gallon coating.

$D_{\text{avg}}$  = Average density of volatile matter in the coating, lbs volatile matter per gallon volatile matter, determined using ASTM Method D1475-98, manufacturer/supplier information, or reference source providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-98 test results and other information sources, then the test results take precedence unless, after consultation, the permittee demonstrates to LRAPA that the formulation data are correct.

- 16.c. The permittee must determine the density of each coating used during the compliance period from test results using ASTM D1475-98, manufacturer/supplier information or specific gravity data for pure chemicals. If there is disagreement between ASTM Method D1475-98 test results and other information sources, then the test results take precedence unless, after consultation, the permittee demonstrates to LRAPA that the formulation data are correct. [40 CFR 63.3941(c)]
- 16.d. The permittee must determine the organic HAP content of each coating used during the compliance period using the following equation: [40 CFR 63.3941(d)]

$$H_c = (D_c * W_c) / V_s$$

where:

$H_c$	=	Organic HAP content of the coating, lb organic HAP emitted per gallon coating solids used.
$D_c$	=	Density of coating, lb coating per gallon coating.
$W_c$	=	Mass fraction of organic HAP in coating, lb organic HAP per lb coating.
$V_s$	=	Volume fraction of coating solids, gallon coating solids per gallon coating.

- 16.e. The calculated organic HAP content for each coating used during the compliance period must be less than or equal to the applicable emission limit in Condition 14; and each thinner and/or other additive, and cleaning material used during the initial compliance period must contain no organic HAP. [40 CFR 63.3941(e)]
- 16.f. If the permittee chooses to comply with the emissions limit in Condition 14 using the compliant materials option, the use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria specified in Condition 15.a, is a deviation that must be reported on the semi-annual compliance certification. [40 CFR 63.3941(f)]
17. Monitoring Requirement(s) - *Emission rate without add-on controls option*: [40 CFR 63.3950 – 63.3952]
- 17.a. The permittee must determine the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each month by using one of the five methods in Condition 16.a. [40 CFR 63.3951(a)]
- 17.b. The permittee must determine the volume fraction of coating solids for each coating used during each month by using one of the four methods in Condition 16.b. [40 CFR 63.3951(b)]
- 17.c. The permittee must determine the density of each coating, thinner and/or other additive, and cleaning material used during each month from test results using ASTM D1475-98, ASTM Method D5965-02 (for powder coatings only), manufacturer/supplier information or reference sources providing density or specific gravity data for pure chemicals. If there is disagreement between ASTM Method test results and other information sources, then the test results take precedence unless, after consultation, the permittee demonstrates to LRAPA that the formulation data are correct. If the permittee purchases materials or monitors consumption by weight instead of volume, it is not necessary to determine material density. [40 CFR 63.3951(c)]
- 17.d. The permittee must determine the volume of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. If the permittee purchases materials or monitors consumption by weight instead of volume, it is not necessary to determine the volume of each material used. [40 CFR 63.3951(d)]
- 17.e. The permittee must determine the mass of organic HAP emissions by determining the combined mass of organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials using the following equation: [40 CFR 63.3951(e)]

$$H_e = A + B + C - R_w$$

where:

$H_e$	=	Total mass of organic HAP emissions during the month, lbs.
$A$	=	Total mass of organic HAP in the coatings used during the month, as calculated by multiplying the total volume of coating used by the density of the coating by the mass fraction of organic HAP in the coating, lbs (40 CFR 63.3951; Eq. 1A).

- B = Total mass of organic HAP in the thinners and/or other additives used during the month, as calculated by multiplying the total volume of thinners and/or other additives used by the density of the thinners and/or other additives by the mass fraction of organic HAP in the thinners and/or other additives, lbs (40 CFR 63.3951; Eq. 1B).
- C = Total mass of organic HAP in the cleaning materials used during the month, as calculated by multiplying the total volume of cleaning materials used by the density of the cleaning materials by the mass fraction of organic HAP in the cleaning materials, lbs (40 CFR 63.3951; Eq. 1C).
- R<sub>w</sub> = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, lbs. (the permittee may assign a value of zero to R<sub>w</sub> if they do not wish to use this allowance)

- 17.f. The permittee must calculate the combined total volume of coating solids used during the month by multiplying the total volume of coating used in the month by the volume fraction of coating solids for that coating. Total volume of coating solids used during the month is the sum of the coating solid volumes for all of the coatings. [40 CFR 63.3951(f)]

$$V_{st} = \sum_{i=1}^m V_{olc,i} V_{s,i}$$

where:

- V<sub>st</sub> = Total volume of coating solids used during that month, gal.
- V<sub>olc,i</sub> = Total volume of coating, i, used during the month, gal.
- V<sub>s,i</sub> = Volume fraction of coating solids for coating, i, gal solids per gal coating, determined according to the equation as set out in Condition 16.b.iv.
- m = Number of coatings used during the month.

- 17.g. The permittee must calculate the organic HAP emission rate (lbs organic HAP/gal coating solids used) for the compliance period by dividing the total mass of organic HAP emissions from all materials used during the compliance period by the total volume of coating solids used during the compliance period [40 CFR 63.3951(g)].

$$H_{yr} = \frac{He}{y} = \frac{He}{n V_{st}}$$

where:

- H<sub>yr</sub> = The rolling 12-month average organic HAP emission rate, lb organic HAP emitted per gal coating solids used.
- He = Total mass of organic HAP emissions from all materials used during month, y, lb, as calculated in Condition 17.e of this section.
- V<sub>st</sub> = Total volume of coating solids used during the month, y, liters (gal), as calculated in Condition 17.f. of this section.
- y = Month identifier.
- n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

- 17.h. The organic HAP emission rate for each compliance period must be less than or equal to the applicable emission limit in Condition 14. [40 CFR 63.3951(h)]
- 17.i. If the permittee chooses to comply with the emissions limit in Condition 14 using the Emission Rate Without Add-on Controls option, if the organic HAP emission rate for any 12-month compliance period exceeded the emissions limit in Condition 14, this is a deviation that must be reported on the semi-annual compliance certification. [40 CFR 63.3952(b)]
18. Recordkeeping Requirement(s): The permittee must collect and keep records of the data and information specified in Conditions 18.a through 18.i. Failure to collect and keep these records is a deviation from the applicable standard. [40 CFR 63.3930]
- 18.a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart MMMM, and the documentation supporting each notification and report. [40 CFR 63.3930(a)]
- 18.b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses information provided to the permittee by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provide to you by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.3930(b)]
- 18.c. For each compliance period, the records specified in Conditions 18.c.i through 18.c.iii must be kept: [40 CFR 63.3930(c)]
- 18.c.i. A record of the coating operations on which you used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [40 CFR 63.3930(c)(1)]
- 18.c.ii. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. [40 CFR 63.3930(c)(2)]
- 18.c.iii. For the emission rate without add-on controls option, a record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equation 1, 1A through 1C, and 2 of 40 CFR 63.3951; and, if applicable, the calculation used to determine mass or organic HAP in waste materials according to 40 CFR 63.3951(e)(4); the calculation of the total volume of coating solids used each month using Equation 2 of 40 CFR 63.3951; and the calculation of each 12-month organic HAP emission rate using Equation 3 of 40 CFR 63.3951. [40 CFR 63.3930(c)(3)]
- 18.d. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliant material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [40 CFR 63.3930(d)]
- 18.e. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [40 CFR 63.3930(e)]
- 18.f. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.3930(f)]
- 18.g. If the permittee used the emission rate without add-on controls option, the density for each

coating, thinner and/or other additive, and cleaning material used during each compliance period. [40 CFR 63.3930(g)]

- 18.h. If the permittee used an allowance in Equation 1 of 40 CFR 63.3951 for organic HAP contained in waste materials sent to or designated for shipment to a treatment, storage, and disposal facility (TSDF) according to 40 CFR 63.3951(e)(4), the permittee must keep records of the information specified in Conditions 18.h.i through 18.h.iii: [40 CFR 63.3930(h)]
- 18.h.i. The name and address of each TSDF to which the permittee sent waste materials for which the permittee used an allowance in Equation 1 of 40 CFR 63.3951; a statement of which subparts under 40 CFR Parts 262, 264, 265, and 266 apply to the facility; and the date of each shipment. [40 CFR 63.3930(h)(1)]
- 18.h.ii. Identification of the coating operations producing waste materials included in each shipment and the month or months in which the permittee used the allowance for these materials in Equation 1 of CFR 63.3951. [40 CFR 63.3930(h)(2)]
- 18.h.iii. The methodology used in accordance with 40 CFR 63.3951(e)(4) to determine the total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month; and the methodology to determine the mass of organic HAP contained in these waste materials. This must include the sources for all data used in the determination, methods used to generate the data, frequency of testing or monitoring, and supporting calculations and documentation, including the waste manifest for each shipment. [40 CFR 63.3930(h)(3)]
- 18.i. The permittee must keep records of the date, time, and duration of each deviation. On and after January 5, 2021, for each deviation from an emission limitation reported under Conditions 19.d through 19.e, a record of the information specified in Conditions 18.i.i through 18.i.iv, as applicable. [40 CFR 63.3930(j)]
- 18.i.i. The date, time, and duration of the deviation, as reported under Conditions 19.d through 19.e.
- 18.i.ii. A list of the affected sources or equipment for which the deviation occurred and the cause of the deviation, as reported under Conditions 19.d through 19.e.
- 18.i.iii. An estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in 40 CFR 63.3890 or any applicable operating limit in table 1 to this subpart, and a description of the method used to calculate the estimate, as reported under Conditions 19.d through 19.e.
- 18.i.iv. A record of actions taken to minimize emissions in accordance with 40 CFR 63.3900(b) and any corrective actions taken to return the affected unit to its normal or usual manner of operation.
- 18.j. The permittee's records must be in a form suitable and readily available for expeditious review, according to the 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.3931(a)]
- 18.k. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.3931(b)]
- 18.l. The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining 3 years. [40 CFR 63.3931(c)]
19. Reporting Requirement(s): The permittee must submit semiannual compliance reports for each affected

source according to the requirements of Conditions 19.a through 19.e. The semiannual compliance reporting requirements may be satisfied by reports required under other parts of the Clean Air Act (CAA), as specified in Conditions 38 through 40. [40 CFR 63.3920(a)]

- 19.a. *Inclusion with title V report.* Each affected source that has obtained a title V operating permit pursuant to 40 CFR part 70 or 40 CFR Part 71 must report all deviations as defined in 40 CFR 63 Subpart Mmmm in the semiannual monitoring report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A). If an affected source submits a semiannual compliance report required by 40 CFR 70.6(a)(3)(iii)(A) or 40 CFR 71.6(a)(3)(iii)(A), and the semiannual compliance report includes all required information concerning deviations from any emission limitation in 40 CFR 63 Subpart Mmmm, its submission will be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a semiannual compliance report must not otherwise affect any obligation the affected source may have to report deviation from permit requirements to the permitting authority. [40 CFR 63.3920(a)(2)]
- 19.b. *General requirements.* The semiannual compliance report must contain the information specified in Conditions 19.b.i through 19.b.v and the information specified in Conditions 19.c through 19.e that is applicable to the affected source. [40 CFR 63.3920(a)(3)]
- 19.b.i. Company name and address. [40 CFR 63.3920(a)(3)(i)]
- 19.b.ii. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [40 CFR 63.3920(a)(3)(ii)]
- 19.b.iii. Date of report and beginning and ending dates of the reporting period. The reporting period is the 6-month period ending on June 30<sup>th</sup> or December 31<sup>st</sup>. Note that the information reported for each of the 6 months in the reporting period will be based on the last 12 months of data prior to the date of each monthly calculation. [40 CFR 63.3920(a)(3)(iii)]
- 19.b.iv. Identification of the compliance option or options specified in 40 CFR 63.3891 that the permittee used on each coating operation during the reporting period. If the permittee switched between compliance options during the reporting period, the permittee must report the beginning and ending dates for each option the permittee used. [40 CFR 63.3920(a)(3)(iv)]
- 19.b.v. If the permittee used the emission rate without add-on controls in 40 CFR 63.3891(b), the calculation results for each rolling 12-month organic HAP emission rate during the 6-month reporting period. [40 CFR 63.3920(a)(3)(v)]
- 19.c. *No deviations.* If there were no deviations from the emission limitations in 40 CFR Parts 63.3890, 63.3892, and 63.3893 that apply to the permittee, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [40 CFR 63.3920(a)(4)]
- 19.d. *Deviations: Compliant material option.* If the permittee used the compliant material option and there was a deviation from the applicable organic HAP content requirements in 40 CFR 63.3890, the semiannual compliance report must contain the information in Conditions 19.d.i through 19.d.v. [40 CFR 63.3920(a)(5)]
- 19.d.i. Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used. [40 CFR 63.3920(a)(5)(i)]
- 19.d.ii. The calculation of the organic HAP content (using Equation 2 of 40 CFR 63.3941) for each coating identified in Condition 19.d.i. The permittee does not need to submit background data supporting this calculation (e.g., information provided by the coating suppliers or manufacturers, or test reports). [40 CFR 63.3920(a)(5)(ii)]



- 19.d.iii. The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in Condition 19.d.i. The permittee does not need to submit background data supporting this calculation (e.g., information provided by material suppliers or manufacturers, or test reports). [40 CFR 63.3920(a)(5)(iii)]
- 19.d.iv. Before January 5, 2021, a statement of the cause of each deviation. On and after January 5, 2021, a statement of the cause of each deviation (including unknown cause, if applicable). [40 CFR 63.3920(a)(5)(iv)]
- 19.d.v. On and after January 5, 2021, the number of deviations and, for each deviation, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in 40 CFR 63.3890, a description of the method used to estimate the emissions, and the actions you took to minimize emissions in accordance with 40 CFR 63.3900(b). [40 CFR 63.3920(a)(5)(v)]
- 19.e. *Deviations: Emission rate without add-on controls option.* If the permittee uses the emission rate without add-on controls option and there was a deviation from the applicable emission limit in 40 CFR 63.3890, the semiannual compliance report must contain the information in Conditions 19.e.i through 19.e.iv [40 CFR 63.3920(a)(6)]
  - 19.e.i. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the applicable emission limit in 40 CFR 63.3890. [40 CFR 63.3920(a)(6)(i)]
  - 19.e.ii. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred. The permittee must submit the calculations for Equations 1, 1A through 1C, 2, and 3 of 40 CFR 63.3951; and if applicable, the calculation used to determine mass of organic HAP in waste materials according to 40 CFR 63.3951(e)(4). The permittee does not need to submit background data supporting these calculations (e.g., information provided by materials suppliers of manufacturers, or test reports). [40 CFR 63.3920(a)(6)(ii)]
  - 19.e.iii. Before January 5, 2021, a statement of the cause of each deviation. On and after January 5, 2021, a statement of the cause of each deviation (including unknown cause, if applicable). [40 CFR 63.3920(a)(6)(iii)]
  - 19.e.iv. On and after January 5, 2021, the number of deviations and, for each deviation, the date, time, duration, a list of the affected source or equipment, an estimate of the quantity of each regulated pollutant emitted over any applicable emission limit in 40 CFR 63.3890, a description of the method used to estimate the emissions, and the actions the permittee took to minimize emissions in accordance with 40 CFR 63.3900(b). [40 CFR 63.3920(a)(6)(iv)]

**Emission Units – MF-1, MF-2, BT-1, BT-2, and BT-3: Specific Emission Limits and Standards**

**Table 7: Specific Emission Limits and Standards for the following Emission Units; Metal Fabrication 1 (Bays 1 & 2), Metal Fabrication 2 (Bays 3 & 4), and the Burn Tables – Whitney, Messer and Wet (EU – MF-1, MF-2, BT-1, BT-2, and BT-3)**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/ Standard	Monitoring Requirement	Monitoring Condition
LRAPA 32-010(1) and 32-010(3)	20	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	20.a
LRAPA 32-015(2) (b)(B)	21	PM	0.14 gr/dscf	VE Periodic Monitoring	21.a

20. Applicable Requirement(s): The permittee must not emit or allow to be emitted any visible emissions that

equal or exceed an average of 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. The emission standards in this condition do not apply to fugitive emissions from a source of part of a source. [LRAPA 32-010(1) and (3)]

- 20.a. **Monitoring Requirement(s):** At least monthly, the permittee must conduct a six (6) minute visible emission survey of each emission unit with devices with the potential to emit visible air contaminants to the atmosphere using EPA Method 22 for monitoring pertaining to Condition 20. The visible emission survey may be conducted simultaneously on multiple emission points when they are in the same field of view for the observer. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. Excessive emissions observed using EPA Method 22 are considered to be any visible emission that leave the emission unit boundaries for more than 5% of the survey time. The emission unit boundary is defined as the general location of the permittee's property of the emission unit that includes the emitting device.
- 20.a.i. If any test result exceeds the applicable standard in Condition 20, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable.
- 20.a.ii. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.
- 20.b. **Recordkeeping:** The permittee must maintain records of the visible emissions surveys, corrective actions (if necessary), and/or the results of any Modified EPA Method 9 tests.
21. **Applicable Requirement(s):** The permittee must not cause or allow the emission of particulate matter, in excess of 0.14 grains per dry standard cubic foot for any sources installed, constructed or modified after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
- 21.a. **Monitoring and Testing:** The permittee must demonstrate compliance with Condition 21 by performing the visible emission compliance monitoring required by Condition 20. [LRAPA 35-0120 and OAR 340-218-0050(3)]

### **Insignificant Activities Emission Limits and Standards**

22. **Applicable Requirement(s):** LRAPA acknowledges that insignificant emission units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emission [LRAPA title 12 and OAR 340-200-0020] exist at facilities required to obtain an LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 22.a. LRAPA 32-010(3) (20% opacity for a period or periods aggregating more than three (3) minutes in any hour for sources other than wood fired boilers.);
- 22.b. LRAPA 32-015(2)(c) (0.10 gr/dscf for non-fugitive, non-fuel burning process equipment installed, constructed, or modified after April 16, 2015);
- 22.c. LRAPA 32-015(2)(b)(B) (0.14 gr/dscf for non-fugitive, non-fuel burning process equipment installed, constructed, or modified before April 16, 2015 with no representative compliance source test results);

- 22.d. LRAPA 32-045 (Process weight limit for non-fugitive, non-fuel burning process equipment).
23. Testing, Monitoring, and Recordkeeping Requirement: Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in LRAPA title 12 and perform the testing in accordance with the ODEQ’s *Source Sampling Manual*.

#### **EMISSION-FEES**

24. Emission fees will be based on the Plant Site Emission Limits unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. [OAR 340-220-0090]

#### **GENERAL MONITORING REQUIREMENTS**

25. The permittee must submit and follow an LRAPA-approved Inspection and Maintenance (I&M) plan and schedule. The plan must be updated upon LRAPA request, or as necessary. [LRAPA 32-007]
26. The permittee must not knowingly render inaccurate any required monitoring device or methods. [OAR 340-218-0050(3)(a)(E)]
27. Methods used to determine actual emissions for fee purposes must also be used for compliance determinations and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)]
28. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

#### **GENERAL RECORDKEEPING REQUIREMENTS**

29. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
- 29.a. The date, place as defined in the permit, and time of sampling or measurements;
- 29.b. The date(s) analyses were performed;
- 29.c. The company or entity that performed the analyses;
- 29.d. The analytical techniques or methods used;
- 29.e. The results of such analyses;
- 29.f. The operating conditions as existing at the time of sampling or measurement; and
- 29.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
30. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the mission record(s) must not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information must not be considered a missing record. [LRAPA 35-160, OAR 340-214-

0114, and 340-218-0050(3)(b)]

31. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
32. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contamination Discharge Permit must also be retained for five (5) years. [OAR 340-218-0050(3)(b)(B)]

**REPORTING REQUIREMENTS [OAR 340-218-0050(3)(c)]**

33. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [LRAPA 36-025]
  - 33.a. Immediately (within 1 hour of the event) notify LRAPA of an excess emission event by phone, email, or facsimile; and
  - 33.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025(1)]
    - 33.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
    - 33.b.ii. The date and time the permittee notified LRAPA of the event;
    - 33.b.iii. The equipment involved;
    - 33.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
    - 33.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
    - 33.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
    - 33.b.vii. The final resolution of the cause of the excess emissions; and
    - 33.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limit were due to any emergency pursuant to LRAPA 36-040.
  - 33.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - 33.d. If start-ups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
  - 33.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.

- 33.f. The permittee must continue to maintain a log of all excess emissions in accordance with LRAPA 36-025(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
34. **Permit Deviation Reporting:** The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined in OAR 340-218-0050(3)(c)(B) as 15 days. Deviations that cause excess emissions, as specified in LRAPA title 36 must be reported in accordance with Condition 33. [OAR 340-218-0050(3)(c)(B)]
35. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
36. **Greenhouse Gas Registration and Reporting:** If the calendar year emission rate of greenhouse gases (CO<sub>2</sub>e) is greater than or equal to 2,756 tons (2,500 metric tons including both biogenic and anthropogenic), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5). [OAR 340-215-0040(1)]
37. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit [OAR 340-218-0050(3)(c)(E)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

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

Air Operating Permits  
Enforcement and Compliance Assurance Division  
Region 10 (20-C04)  
U.S. Environmental Protection Agency  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

#### SEMI-ANNUAL AND ANNUAL REPORTS

38. The permittee must submit three (3) copies of the semi-annual monitoring report, using LRAPA-approved forms, covering the period January 1 to June 30 **by July 30**, and covering the period July 1 to December 31 **by February 15**, unless otherwise approved in writing by LRAPA. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 38.a. The semi-annual report is due on July 30 and must include the semi-annual compliance certification, OAR 340-218-0080 and information required by Condition 11.
- 38.b. The annual report must be due on February 15 and must consist of the following:
- 38.b.i. The emission fee report; [OAR 340-220-0100]
- 38.b.ii. The excess emissions upset log; [LRAPA 36-025]
- 38.b.iii. The second semi-annual compliance certification; and [OAR 340-218-0080]
- 38.b.iv. The second semi-annual report must also include the NESHAP information required by Condition 14.
- 38.b.v. Document any new VOC/HAP containing raw materials used by the facility and provide updated or new SDS or Certified Product Data Sheet as necessary.

39. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
- 39.a. The identification of each term or condition of the permit that is the basis of the certification;
- 39.b. The identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). Note: If necessary, the permittee also must identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
- 39.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 38.b. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12, occurred; and
- 39.d. Such other facts as LRAPA may require to determine the compliance status of the source.
40. Notwithstanding any other provision contained in any applicable requirement, the permittee may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

**NON-APPLICABLE REQUIREMENTS**

41. The following Federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110]

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 63, Subpart HHHHHH	National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources.	The facility is not subject to this NESHAP because the facility is a major source.
40 CFR Part 63, Subpart XXXXXX	National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Nine Fabrication and Finishing Source Categories.	The facility is not subject to this NESHAP because the facility is a major source.

## **GENERAL CONDITIONS**

### **G1. General Provision**

Terms not otherwise defined in the permit must have the meaning assigned to such terms in the referenced regulation.

### **G2. Reference Materials**

Where referenced in this permit, the version of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. Source Sampling Manual; November 15, 2018 - State Implementation Plan Volume 4, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

### **G3. Applicable Requirements [OAR 340-218-0010(3)(b)]**

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the LRAPA Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

### **G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]**

- a. The permittee must comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance must be supplemental to, and must not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

### **G5. Masking Emissions:**

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050(2)] This condition is enforceable only by LRAPA.

### **G6. Credible Evidence**

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [LRAPA 34-017]

G7. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G8. Outdoor Burning [LRAPA Title 47]

The permittee is prohibited from conducting outdoor burning, except as may be allowed by LRAPA 47-001 through 47-030.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0240, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee must comply with OAR 340-248-0240, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit must be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
  - i. such applicable requirements are included and are specifically identified in the permit, or
  - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit must alter or affect the following:
  - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
  - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. the applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or
  - iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

G12. Inspection and Entry [OAR 340-218-0080(3)]



Upon presentation of credentials and other documents as may be required by law, the permittee must allow Lane Regional Air Protection Agency, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where a Title V operating permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or LRAPA rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under Section 112(r) of the Federal Clean Air Act. The permittee must submit payment to Lane Regional Air Protection Agency, 1010 Main Street, Springfield, Oregon, 97477, within 30 days of the date LRAPA mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to LRAPA. Payment must be made regardless of the dispute. User-based fees must be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee must monitor for, and record, any off-permit change to the source that:
  - i. Is not addressed or prohibited by the permit;
  - ii. Is not a Title I modification;
  - iii. Is not subject to any requirements under Title IV of the FCAA;
  - iv. Meets all applicable requirements;
  - v. Does not violate any existing permit term or condition; and
  - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in LRAPA Title 12.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to LRAPA and the EPA.
- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 must not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must monitor for, and record, any Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
  - i. Violate an applicable requirement;

- ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
  - iii. Be a Title I modification.
- b. A minimum 7-day advance notification must be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
  - c. The permit shield of Condition G11 must not extend to Section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. Sale or exchange of the activity or facility.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180.

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source of air pollution control equipment in accordance with LRAPA 34-010 and 34-034 through 34-038.

G21. New Source Review Modification [LRAPA 38-0010]

The permittee must not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010) from LRAPA and having satisfied the requirements of LRAPA Title 38 (New Source Review).

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

The permittee must furnish to LRAPA, within a reasonable time, any information that LRAPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to

LRAPA copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to LRAPA along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
- b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and must affect only those parts of the permit for which cause to reopen exists.

G25. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit must expire at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless LRAPA requests an earlier submittal. If more than 12 months is required to process a permit renewal application, LRAPA must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit must remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G28. Property Rights [340-218-0050(6)(d)]

The 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, except as provided in OAR 340-218-0110.

G29. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

The permittee must have available at the facility at all times a copy of the LRAPA Title V Operating Permit and must provide a copy of the permit to LRAPA or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

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