

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

**SYNTHETIC MINOR**  
**AIR CONTAMINANT DISCHARGE PERMIT (SM-ACDP)**

Issued in accordance with provisions of Title 34, Lane Regional Air Pollution Authority's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:  
**Newood Display Fixture Mfg. Company**  
10 North Seneca Road  
Eugene, Oregon 97402

Land Use Compatibility Statement:  
From: City of Eugene  
Date Issued: October 27, 1997

Mailing Address:  
P.O. Box 21808  
Eugene, Oregon 97402-0412

Fee Basis:  
Table A, Part II, 20:  
Furniture and Fixture Manufacturing

Permit Number: 205808  
Permit Type: Synthetic Minor  
SIC: 2541 Wood Office and Store Fixtures  
Date Renewed: June 25, 2000  
Expiration Date: June 24, 2005

Permitted Sources  
Wood Parts Coating Line  
Woodworking Operations

Issued  
By: \_\_\_\_\_  
Brian L. Jennison, Ph.D., 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 Pollution Authority (LRAPA).

Synthetic Minor Limits

2. Potential emissions from this source shall be limited by federally enforceable conditions. In accordance with LRAPA 34-120, the permittee has elected to limit total emissions of any single Hazardous Air Pollutant (HAP) and any combination of Hazardous Air Pollutants (HAPs) to levels below the Title V Major Source thresholds of 10 tons per year for a single HAP and 25 tons per year for any combination of HAPs.

Total emissions from all sources located on the plant site shall not exceed the limits below.

**SYNTHETIC MINOR EMISSION LIMITS  
(tons per 12-month period)**

<u>Source</u>	<u>HAP</u> <sub>SINGLE</sub>	<u>HAP</u> <sub>AGGREGATE</sub>
Facility-wide Coating Operations and Solvent Usage	9.5	24.0

3. This facility shall not use raw materials which would emit more than:  
9.5 tons/year of a single HAP  
24.0 tons/year of aggregate of HAPs
4. The permittee shall monitor compliance by keeping records as required by Condition 11 and using these records to calculate a new 12-month total for each HAP and combination of HAPs on the first working day of each month. The 12-month rolling totals shall be determined by adding emissions for the previous month to the most recent 11 months. Calculated values shall not exceed the Synthetic Minor Limits in Condition 2.
5. Monthly HAP emissions shall be calculated using the equations shown in Condition 8.

Plant Site Emission Limits (PSEL)

6. The total emissions from the plant shall not exceed the monthly and annual limits below. These limits were calculated using the proposed maximum production rates, process emission factors, and an assumed

removal efficiency for the control equipment. Calculation details are found in the attached Review Report. [LRAPA 34-060(5)]

**Monthly PSELS  
 (tons/month)**

<u>Source</u>	<u>PM<sub>10</sub></u>	<u>PM</u>	<u>SO<sub>x</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>
Facility-wide Coating Operations and Solvent Usage	---	---	---	---	---	5.5
Miscellaneous Woodworking	0.25	0.25	---	---	---	---
<b>TOTAL MONTHLY PSEL</b>	<b>0.25</b>	<b>0.25</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>5.5</b>

**Annual PSELS  
 (tons)**

<u>Source</u>	<u>PM<sub>10</sub></u>	<u>PM</u>	<u>SO<sub>x</sub></u>	<u>NO<sub>x</sub></u>	<u>CO</u>	<u>VOC</u>
Facility-wide Coating Operations and Solvent Usage	---	---	---	---	---	39.0
Miscellaneous Woodworking	1.0	1.0	---	---	---	---
<b>TOTAL ANNUAL PSEL</b>	<b>1.0</b>	<b>1.0</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>39.0</b>

7. Any changes in operation that may increase the emissions must be approved by LRAPA. Failure to do so may result in enforcement actions being taken by LRAPA. Substitutions of coatings may be employed provided that both consumption and composition records are maintained in accordance with the permit reporting requirements. [LRAPA 34-110(5)]

Emissions Calculations

8. The permittee shall determine compliance with the Synthetic Minor Emission Limits established in Condition No. 2 of this permit in accordance with the following procedures:

The permittee shall maintain usage records of all materials that

contain HAPs and calculate the monthly total emitted quantities of each single HAP used, and a total for all HAPs, using the following equations:

$$\text{For HAP}_{(S)}: [E_S = \Sigma (RM \times D \times HAP_{(S)} \times EF \times K)]$$

Where:

- $E_S$  = quantities of each HAP emitted in tons/month
- $(S)$  = HAP name
- RM = Raw Material usage in gallons/month
- D = Density of each Raw Material used in pounds /gallon as obtained from the MSDS
- $HAP_{(S)}$  = Individual content of HAPs content in Raw Material by weight fraction as obtained from the MSDS
- EF = Emission Factor - An emission factor of 1.0 will be assumed in determining HAP emissions
- K = Conversion Factor Constant: 1/2000 pounds

$$\text{For HAP}_{(AGGREGATE)}: [E_A = \Sigma E_S]$$

Where:

- $E_A$  = The aggregate of all HAP in tons/month

9. The permittee shall determine compliance with the PSELs (Plant Site Emission Limits) established in Condition No. 6 of this permit in accordance with the following procedures:

The permittee shall maintain usage records of all materials that contain VOCs and calculate the monthly and annual emissions using the following equations:

**For VOC:      [E =  $\Sigma$  (RM x D x VOC x EF x K)]**  
**such that the total emissions shall be  $\leq$**   
**(less than or equal to) 5.5 tons/month,**  
**and  $\leq$  39.0 tons/year**

Where:

E = VOC emissions in tons/month and tons/year  
RM = Raw Material usage in gallons/month and  
gallons/year  
D = Density of each Raw Material used in pounds  
/gallon as obtained from the MSDS  
VOC = VOC content of Raw Material by weight fraction  
as obtained from the MSDS  
EF = Emission Factor -- Unless the MSDS states  
otherwise, an emission factor of 1.0 will be  
assumed for all raw material containing VOC  
K = Conversion Factor Constant: 1/2000 pounds

**For PM & PM<sub>10</sub>:      [E =  $\Sigma$  (RM x EF x K)]**  
**such that the total emissions shall be  $\leq$**   
**(less than or equal to) 0.25 tons/month, and**  
 **$\leq$  1.0 tons/year**

Where:

E = PM and PM<sub>10</sub> emissions in tons/month and  
tons/year  
RM = Raw Material usage in bone dry tons (BDT)/month  
and BDT/year  
EF = Emission Factor -- An emission factor of 1.0  
pound of PM and 1.0 pound of PM<sub>10</sub> will be used  
for every BDT  
K = Conversion Factor Constant: 1/2000 pounds

#### Special Conditions

10. If the permittee anticipates that future emission levels of criteria pollutants or HAPs, excluding excess emissions allowed under LRAPA 36-015(1), will exceed the Title V thresholds [as defined in OAR 340 Division 28], the permittee shall follow the procedures outlined in LRAPA 34-120 (5) or (6) to apply for a Federal Operating Permit.

#### Monitoring, Recordkeeping and Reporting Requirements

11. The permittee shall monitor and maintain records of the following information:

<u>Activity</u>	<u>Parameter</u>	<u>Units</u>	<u>Recording Frequency</u>
Facility-wide VOC/HAP-containing Material Usage <sup>1</sup>	Raw Material Usage	gallons	Monthly
VOC/HAP-containing Glue, Adhesive, and Putty Usage <sup>1</sup>	Raw Material Usage	Will vary per raw material	Monthly
Facility-wide VOC/HAP-containing Material Usage <sup>1</sup>	Density of Raw Materials	pounds/gallon	Per coating and solvent <sup>2</sup>
Facility-wide VOC-containing Material Usage <sup>1</sup>	VOC Content	% by weight less water/gallon	Per coating and solvent <sup>2</sup>
Facility-wide HAP-containing Material Usage <sup>1</sup>	HAP Content	% by weight /gallon	Per coating and solvent <sup>2</sup>
Woodworking	Truck Load	bone dry ton	Monthly

<sup>1</sup>NOTE: VOC/HAP-containing material can include but is not limited to: coatings, lacquers, thinners, stains, topcoats, and solvents.

<sup>2</sup>NOTE: This information shall be supplied from MSDS provided by the manufacturer/supplier of the coatings or solvents.

12. A quarterly summary to document compliance with Conditions 2 and 6 shall be submitted on the enclosed forms (or their equivalent) for each quarter. Quarters shall be as follows: 1st quarter is January, February, and March; 2nd quarter is April, May, and June; 3rd quarter is July, August, and September; and 4th quarter is October, November, and December. Third quarter reports shall contain the information required by Condition G13.

The quarterly reports are due thirty (30) days after the end of each quarter. This information will be used to determine compliance with the monthly and annual Synthetic Minor Limits and PSEs. [LRAPA 34-070(5)]

13. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office: [LRAPA 34-070 (5)]

Newood Display Fixture Mfg. Company  
Permit No. 205808  
Expiration Date: June 24, 2005

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

Billing and Invoicing

14. In accordance with adopted regulations, the permittee will be invoiced annually for the Compliance Determination Fee and for all applicable fees associated with the ACDP. [LRAPA 34-150(3)]

DJ/bp  
12/11/01

**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.
- 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. The permittee shall not discharge from any source whatsoever such quantities of air contamination which cause injury, detriment, public nuisance or annoyance to any persons or to the public or which cause injury or damage to business or property; such determination to be made by the authority. [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 33-030(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(2)]

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 considered 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 resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. [LRAPA 32-001(1)]

Excess Emissions: Notification and Record-keeping

G12. The permittee must immediately (i.e., as soon as possible, but in no case more than one (1) hour after the beginning of the excess emissions period) notify LRAPA by telephone or in person of all cases of excess emissions due to upset or breakdown. [LRAPA 36-020(1)] Notification shall include:

- a) the source name;
- b) the nature of the emissions problem;
- c) the name of the person making the report;
- d) the name and telephone number of the contact person for further information;
- e) the date and time of the onset of the upset condition;
- f) whether or not the incident was planned;
- g) the equipment involved in the upset or breakdown;
- h) the estimated type and quantity of excess emissions;
- i) the estimated time of return to normal operations;
- j) the efforts made to minimize emissions; and
- k) a description of remedial actions to be taken.

Notification shall 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 shall immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

Follow-up reporting, if required by LRAPA, shall contain all information

required by Condition G15.

- G13. At each reporting period specified in this permit, or sooner if required by the Authority, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)]
- G14. Any excess emissions which could endanger public health or safety 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. [LRAPA 36-025(3) and 36-030(1)] The upset log shall include the following:
- a) the date and time each event was reported to the Authority;
  - 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) the final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for two (2) calendar years.  
[LRAPA 36-025(4)]

Excess Emissions: Scheduled Maintenance

- G16. Where it is anticipated that shutdown, by-pass, or operation at reduced efficiency of production equipment or air pollution control equipment for necessary scheduled maintenance may result in excess emissions, the permittee must obtain prior Authority approval of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance shall be submitted and received by the Authority in writing at least seventy-two (72) hours prior to the event. [LRAPA 36-015(1)] The application shall include the following:
- a) the reasons explaining the need for maintenance, including why it would be impractical to shut down the source operation during the period, and why the by-pass or reduced efficiency could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
  - b) identification of the specific production or emission control equipment or system to be maintained;
  - c) the nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of

the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and

- d) identification of specific procedures to be followed which will minimize excess emissions.

G17. No scheduled maintenance which is likely to result in excess emissions shall occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced "Stage I Red" woodstove advisory period, in areas determined by the Authority as PM<sub>10</sub> Nonattainment Areas. [LRAPA 36-015(4)]

G18. In cases where the Authority 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 36-025(2), the permittee shall immediately notify the Authority by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(5)]

#### Air Pollution Emergencies

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

#### Notification of Construction/Modification

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

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

#### Notification of Name Change

G21. The permittee 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 60 days prior to the permit expiration date. A Filing Fee, an Application Processing Fee, and an Annual Compliance Determination Fee must be submitted with the application for the permit renewal. [LRAPA 34-035]
- G23. The procedure for issuance of a permit shall apply to renewal of a permit. If a completed application for a renewal of a permit is filed with the Authority in a timely manner, prior to the expiration date of the permit, the permit shall not be deemed to expire until final action has been taken on the renewal application to issue or deny a permit. [LRAPA 34-130(16)]

Termination Conditions

- G24. This permit shall be automatically terminated: [LRAPA 34-140(2)]
- a) within sixty (60) days after sale or exchange of the activity or facility which requires a permit;
  - b) upon change of nature of the activities, operations, emissions, or discharges from those of record in the last application;
  - c) within one (1) year after a plant closure lasting continuously for one (1) or more years;
  - d) upon issuance of a new, renewal, or modified permit for the same operation; or
  - e) upon written request of the permittee.
- G25. In the event that it becomes necessary to suspend or terminate this permit due to non-compliance with the terms of the permit, unapproved changes in operation, false information submitted in the application or any other cause, the Authority shall notify the permittee by registered or certified mail of its intent to suspend or revoke the permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective twenty (20) days from the date of mailing of such notices unless, within that time, the permittee requests a hearing. Such a request for hearing shall be made in writing and shall state the grounds for such a request. [LRAPA 34-140(3)]

- G26. Termination of this permit resulting from continuous plant closure shall subject the source to review as a new non-permitted source upon application to operate the facility. [LRAPA 34-140(4)]
- G27. If the Authority finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may suspend or terminate this permit, effective immediately. Notice of such suspension or termination must state the reasons for such action and advise that the permittee may request a hearing. Such a request for a hearing shall be made in writing within ninety (90) days of the date of the suspension and shall state the grounds for the request. [LRAPA 34-140 (5)]
- G28. Any hearing requested shall be conducted pursuant to the rules of the Authority. [LRAPA 34-140(6)]
- G29. The permittee shall submit, by April 20 of each year, the emission inventory form provided by the Authority.

DW/bp [revised 10/24/01]