

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:

Orkot Incorporated
2535 Prairie Road, Unit "D"
Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene
Dated: November 18, 1999

Mailing Address

2535 Prairie Road, Unit D
Eugene, Oregon 97402

Fee Basis:

Reinforced Thermoset
Laminates Manufacturing
Table A, Part II, 62b

Permit Number: 206121

Permit Type: Synthetic Minor

SIC: 3083 Laminates Manufacturing

Date Issued: November 22, 1999

Expiration Date: November 21, 2004

Permitted Sources

4 Resin Baths
2 Curing Ovens
3 Curing Presses
1 Baghouse

Issued

By: _____
Jim D. Chartier, Interim Director

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 -- Hazardous Air Pollutants (HAPs)

2. This source will continue to be classified as a synthetic minor for hazardous air pollutants (HAPs) while the potential to emit HAPs is limited to less than:

- **10 tons per year of any single HAP; and**
- **25 tons per year of any combination of HAPs.**

Any violation of any condition that limits the potential to emit will be a violation of LRAPA 34-170 (OAR 340-28-2110), and the source will need to apply for a Federal Operating Permit in accordance with LRAPA 34-120.

3. This condition limits the potential to emit. **The permittee shall limit the use of HAP-containing materials to 320,000 pounds per rolling 12-month period.**

(For polymeric resins or plastics, this limit assumes 30% HAP content by weight, and that 20% of the available HAP is emitted as air contaminants. For other materials, if the HAP content of the material used exceeds 30% HAP, or if the actual HAPs emitted are shown to exceed 20%, the permittee shall adjust material usage to ensure that emissions will not reach major source limits. For all solvents, coatings, or other non-catalyzed HAP-containing material, it shall be assumed that all (100%) of the HAPs are emitted as air contaminants.)

The permittee shall monitor compliance with the HAP limits by calculating a new 12-month total for each individual 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.

For catalyzed polymeric resins or plastics:

$$HAP(r) = (\text{weight of material used}) \times (\% \text{ HAP by weight}) \times EF$$

where

EF = an emission factor of .20 (20% available HAP)

released).

This factor shall be used unless otherwise approved in accordance with LRAPA Title 34.)

For HAP-containing materials, other than catalyzed resins such as solvent or coatings, an emission factor of 1.0 shall be used to calculate emissions.

$$HAP(s) = \frac{(\%HAP \text{ by weight})}{(100)} \times \frac{(Density \text{ lb})}{(gal)} \times (Gal \text{ Consumed}) \times \frac{(1 \text{ ton})}{(2000 \text{ lb})}$$

For purposes of determining compliance with the synthetic minor limits, the source shall include the use of all resins, solvents, catalysts, glues, and all other HAP-containing materials used in the process in the calculation of emissions.

Total HAP emissions calculations shall include both HAP(r) and HAP(s). HAP emissions shall be calculated for each individual HAP and for the total HAPs emitted.

Plant Site Emission Limit (PSEL) -- Volatile Organic Compounds (VOCs)

4. Total emissions from VOC sources located at the plant site shall not exceed the following limits:

25 tons of VOCs per rolling 12-month period.

For catalyzed resins, an emission factor of .20 (EF = .20) shall be used to calculate VOC emissions.

$$VOC(r) = (weight \text{ of material used}) \times (\% \text{ HAP by weight}) \times EF$$

For VOC-containing materials other than catalyzed resins, such as solvents or coatings, an emission factor 1.0 shall be used to calculate emissions.

$$VOC(s) = \frac{(\%VOC \text{ by weight})}{(100)} \times \frac{(Density \text{ lb})}{(gal)} \times (Gal \text{ Consumed}) \times \frac{(1 \text{ ton})}{(2000 \text{ lb})}$$

For purposes of determining compliance with the PSEL, the emissions calculations shall include resins, solvents, catalysts, glues, and all other VOC-containing materials used in the process.

_____ Total VOC emissions calculations shall include both VOC(r) and VOC(s).

Performance Standards and Emissions Limits

5. Particulate emissions from the baghouse shall not exceed 0.1 grains per dry standard cubic foot (gr/dscf).

6. Opacity from the baghouse shall not be equal to or greater than 20% for a period aggregating more than three (3) minutes in any one-hour period.
7. Particulate emissions from the dryer shall not exceed 0.1 gr/dscf, adjusted to 50% excess air.
8. The opacity from the dryers shall not be equal to or greater than 20% for a period aggregating more than three (3) minutes in any 1-hour period.
9. All air pollution control equipment shall be operated and maintained to meet or exceed manufacturer's specifications in order to ensure that emissions are controlled to the greatest extent possible for the type of control equipment used.

Monitoring and Reporting

10. Upset conditions or breakdown of equipment or air pollution control equipment which may result in exceeding the emission limitations specified in this permit must be reported to LRAPA as soon as possible, in accordance with Title 36 of LRAPA's Rules and Regulations.
11. A record of the following data shall be maintained for a period of at least two (2) years and made available for LRAPA inspection upon request. [LRAPA 34-070]
 - a. Daily hours of operation,
 - b. Type and amount of HAP and VOC-containing material used (pounds) monthly
 - c. HAP and VOC content (percent by weight) of all HAP and VOC containing materials used,
 - d. Natural gas used (therms) monthly,
 - e. Amount of waste disposed from baghouse (cubic yards) monthly,
 - f. Emissions calculations of HAP and VOC emissions, and
 - g. Records required by Condition 10 of this permit.

All of the above records shall be compiled monthly and reported to LRAPA semiannually.

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 50-020]

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) 726-2514. 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 log entries for the reporting period. [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 PM₁₀ 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 "Annual Information Update 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)]

Orkot Incorporated
Permit No. 206121
Expiration Date: November 21, 2004

Page 10 of 10

DW/bp [revised 8/18/99]