

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.

WHITTIER WOOD PRODUCTS CO.
3787 West First Avenue
Eugene, Oregon 97402

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

Permit Number: 208894
Permit Type: Synthetic Minor
Issued: August 2, 1996
Expires: August 1, 2001
Modified: July 10, 2000

Permitted Sources:
Furniture Manufacturing
SIC 2511-20

Other Sources on Permit:
None

Specific Emission Points:
Miscellaneous
Wood-working Operations
Wood Parts Coating Line
6 Baghouses

Issued
By: _____
Brian L. Jennison, Ph.D., 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).

Performance Standards and Emissions Limits

2. Synthetic Minor Limits

Section 34-120 of LRAPA's Rules and Regulations (LRAPA's rules), "Synthetic Minor Sources," allows for the potential emissions from this source to be limited by enforceable conditions on the type and amount of material processed.

- a. The permittee shall limit the usage of hazardous air pollutants (HAPs), during any consecutive twelve-month period, to less than 10 tons for any individual HAP or 25 tons for all HAPs aggregated.
 - b. The permittee shall verify compliance with Synthetic Minor limits by keeping usage records of HAP-containing materials, as required in Condition 10, and using the records to calculate HAP usage. HAP usage must be calculated monthly according to the methods in Condition 6 and shall not exceed the amounts specified in the table above.
3. Emissions of particulate matter from these operations are subject to the requirements of Section 32-030 of LRAPA's rules.
 - A. The emissions of particulate matter shall be limited to 0.2 gr/dscf from the exhaust stack for sources existing prior to June 1, 1970.
 - B. The emissions of particulate matter shall be limited to 0.1 gr/dscf from the exhaust stack of sources installed, constructed, or modified after June 1, 1970.
 4. Air contaminant discharges from any source 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 are prohibited by Section 32-090 of LRAPA's rules.

Plant Site Emission Limits (PSEL)

5. Total emissions from all sources located on the plant site shall not exceed the long term and short term limits listed below.

Annual PSEL
(tons per calendar year)

<u>Source</u>	<u>PM</u>	<u>SO₂</u>	<u>NO_x</u>	<u>VOC</u>	<u>CO</u>
Miscellaneous Wood Working	23.7	0	0	0	0
Coating Operations	0	0	0	44.0	0
TOTALS	23.7	0	0	44.0*	0

*This limit applies to any consecutive 12-month period.

Daily PSEL
(average pounds per day)

<u>Source</u>	<u>PM</u>	<u>SO₂</u>	<u>NO_x</u>	<u>VOC</u>	<u>CO</u>
Miscellaneous Wood Working	129.6	0	0	0	0
Coating Operations	0	0	0	552.8	0
TOTALS	129.6	0	0	552.8	0

Synthetic Minor and Plant Site Emission Limit Monitoring

6. By the tenth day of each month, the permittee shall perform calculations to verify compliance with the Synthetic Minor HAP limits in Condition 2(a). All quantities listed below shall be calculated and kept as part of the records:
 - a. Monthly usage for each: Toluene, Xylene, MEK or other HAP identified under item e. below; estimated using the following formula:

$$E_h = \frac{(Q_i * D_i * C_{ij})}{2000}$$

where:

- E_h = HAP h usage for the month (tons);
- Q_i = quantity of material i used during the month (gallons);
- D_i = density of material i (pounds/gallon);
- i = a variable, representing a specific hap-containing material
- C_{ih} = concentration of Hap h in material i (decimal fraction);
- h = a variable representing a hap name (Toluene, Xylene, MEK, other if identified under 6e.)

- b. Calculate total individual HAP usage per rolling 12- month period for each: Toluene, Xylene, MEK and other HAP if necessary, by adding individual HAP monthly usages corresponding to each of the twelve months preceding the date of the calculations. The amount calculated for any of these HAPs must not exceed the individual HAP usage limit established per condition 2a.

$$E_t = \frac{(Q_i * D_i * C_{it})}{2000}$$

- c. Calculate monthly usage for all HAPs aggregated using the following formula:

where:

E_t = total HAP usage for the month (tons);
 Q_i = quantity of material i used during the month (gallons);
 D_i = density of material i (pounds/gallon);
 i = a variable, representing a specific hap-containing material
 C_{it} = total concentration of Haps in material i (decimal fraction);

- d. Calculate total usage of all HAPs aggregated per rolling 12- month period by adding monthly usages corresponding to each of the twelve consecutive months preceding the date of the calculations, this amount must not exceed the total usage for all HAPs aggregated established per condition 2a.
- e. The permittee must identify any new HAP that is emitted in amounts equal or higher than 1,500 lbs per month and perform calculations required in a. and b. above.
7. To verify compliance with the long term VOC PSEL in Condition 5 the permittee shall calculate monthly and total per rolling 12-month period VOC emissions. By the tenth day of each month and using the records required per Condition 10, the permittee shall calculate monthly VOC emissions using the following formula:

$$E_{VOC} = \frac{\sum(U_x * D_x * K_x) - W}{2000}$$

where:

E_{VOC} = VOC emissions for the month (tons);
 U_x = material usage for the month (gallons);
 D_x = material density (pounds/gallon);
 K_x = VOC concentration of material x (decimal fraction);
 X = variable, representing a specific VOC-containing material: and
 W = monthly amount of waste solvent (VOC) generated and shipped offsite (pounds).

To verify compliance with the long term PSEL, the permittee shall calculate total VOC emissions per rolling 12-month period by adding monthly VOC emissions corresponding to each of the twelve months preceding the date of the calculation. Calculated total VOC emissions per rolling 12-month period shall not exceed the VOC limit in Condition 5.

8. The permittee shall verify compliance with the daily VOC PSEL in Condition 5 by calculating the daily average VOC emissions for the month as follows:

$$E_{VOCm} = \frac{E_{VOC}}{n}$$

where:

- E_{VOC} = VOC emissions for the month (tons);
- E_{VOCm} = average daily VOC emissions for the month (pounds);
- n = number of days in the month;

The average daily VOC emissions shall not exceed the daily PSEL limit for VOC emissions.

Additional Monitoring Requirements

9. 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

10. Recordkeeping Requirements

In accordance with Title 34-070 of LRAPA's rules, a record of the following data

Parameter	Minimum Recording Frequency
Maintain a list of all VOC-containing and all HAP-containing materials used in the process including but not limited to: stains, thinners, washcoats, sealers, topcoats, basecoats, enamels, adhesives, solvents used for washoff and clean-up	Update list monthly, if new materials were used during the month
Quantity of each VOC-containing and each HAP-containing material used (gallons)	Monthly

VOC content for each VOC-containing material listed (percent by weight [less water]). Maintaining current MSDS for all listed materials fulfills this requirement.	Update as needed to reflect changes and/or new materials
HAP content for each HAP-containing material (percent by weight [less water]). Maintaining current MSDS for all listed materials fulfills this requirement.	Update as needed to reflect changes and/or new materials
Density for each VOC-containing and/or HAP-containing material used in the process (pounds per gallon). Maintaining current MSDS for all listed materials fulfills this requirement.	Update as needed to reflect changes and/or new materials
Amount of waste solvent (VOC) generated and shipped off site (pounds)	Monthly
Amount of waste-wood generated (tons)	Monthly

shall be maintained for a period of at least 5 years and made available for LRAPA inspection upon request.

Reporting Requirements

11. The permittee shall prepare quarterly reports containing the following information:

For each month during the reporting period:

- A. total VOC emissions per rolling 12-month period;
- B. total aggregate HAP usage per rolling 12-month; and
- C. highest total individual HAP usage per rolling 12-month period , also identify the individual HAP by name

The reports shall be submitted by February 15, May 15, August 15, and November of each year. The reporting period covers the previous three calendar months (October through December, January through March, April through June, and July through September, respectively).

12. Unless otherwise specified, all reports, test results, notifications, etc., required by this permit shall be reported to the following office:

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

Emission Reduction Plan

13. In accordance with Title 51 of LRAPA's rules," the permittee will implement the following emissions reduction plan during air pollution episodes when so notified by LRAPA.

<u>Ozone Episode Level</u>	<u>Required Action</u>
Alert and Warning:	Prepare to shut down surface-coating operations.
Emergency:	Shut down surface-coating operations.

General Conditions and Disclaimers

14. LRAPA representatives shall be permitted access to the plant site at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, and otherwise conducting necessary functions related to this permit.
15. No person shall cause or permit particulate matter to be handled, transported, or stored without taking necessary measures to minimize emissions.
16. The permittee shall at all times maintain and operate all air contaminant generating processes and all air contaminant control equipment at full efficiency and effectiveness so that emissions of air contaminants are kept at the lowest practicable levels.
17. In accordance with Section 48-015-2, of LRAPA's rules, no person shall cause or permit particulate matter to become airborne from open areas or roadways used by vehicles without taking necessary measures to minimize emissions leaving the plant site.
18. No person shall cause or permit any volatile organic compound (VOC) to be handled, transported, or stored without taking necessary precautions to minimize emissions.
19. All plant processes discharging air contaminants and all air contaminant collection and disposal facilities shall be operated and maintained at all times in a manner which shall minimize air contaminant discharges.
20. No open burning shall be conducted on the plant site.
21. Installation or establishment of a new air contaminant source or modification of this permitted source, as defined in Title 12 of LRAPA's rules, is prohibited without first notifying LRAPA in writing and obtaining approval. If a proposed modification or

enlargement of an existing air contaminant source will result in an increase in emissions of air contaminants, a permit modification is also required before the modification occurs.

Application for a modification of this permit must be submitted not less than 60 days prior to the source modification. A filing fee and an application-processing fee are required by Title 34 of LRAPA's rules and must be submitted with the application.

22. A copy of the permit application and this Synthetic Minor Air Contaminant Discharge Permit (SM•ACDP) must be available on site for inspection upon request.

Fee Schedule

23. In accordance with adopted regulations, the permittee will be invoiced annually for all applicable air contaminant discharge permit fees and for all applicable fees associated with Synthetic Minor status.

GC
7/7/00

ATTACHMENT A

Plant Site Emissions Summary
Summary of Calculation Basis for PSEL
(August 2, 1995)

<u>Source</u>	<u>PM₁₀</u>		<u>VOC</u>	
	<u>lbs/hr</u>	<u>tons/yr</u>	<u>lbs/hr</u>	<u>tons/yr</u>
Miscellaneous Wood Working	5.4	23.7	0	0
Coating Operations	0	0	69.1	44.0
Facility Totals	5.4	23.7	69.1	44.0

- Emissions were calculated by mass balance or using emissions factors from the DEQ/AQ Permitting and Inspection Manual.

Summary of Production Data and Operating Parameters

Miscellaneous Wood-working:

Maximum operating schedule: 8,760 hours per year

Normal operating schedule: 80 hours per week, 51 weeks per year

Coating Operations:

Maximum operating schedule: 8,760 hours per year

Normal Operating Schedule: 80 hours per week, 51 weeks per year