

**LANE REGIONAL AIR POLLUTION AUTHORITY
TITLE V OPERATING PERMIT REVIEW REPORT**

Georgia-Pacific Resins, Inc.
2655 Highway 99 North
Eugene, Oregon 97402

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT

ACDP	Air Contaminant Discharge Permit	MBF	1,000 Board feet
Act	Federal Clean Air Act	MSF	1,000 Square feet 3/8" basis
ASTM	American Society of Testing and Materials	MSDS	Material Safety Data Sheets
		MAT-S	Material handling –Sawmill
BDT	Bone dry ton	MAT-V	Material Handling-Veneer
BDU	Bone dry unit	MeOH	Methanol
BF	Board feet	NA	Not applicable
Btu	British thermal unit	NO _x	Nitrogen oxides
CFR	Code of Federal Regulations	NSPS	New Source Performance Standards
CO	Carbon Monoxide		
CPMS	Continuous parameter monitoring system	O ₂	Oxygen
		OAR	Oregon Administrative Rules
DEQ	Department of Environmental Quality	ODEQ	Oregon Department of Environmental Quality
		ORS	Oregon Revised Statutes
DETA	Diethylene Triamine	O&M	Operation and maintenance
DMG	Dimethyl Glutarate	PAB50	Poly/Allylbiguanido-co-Allylamine
dscf	Dry standard cubic feet	PF	Phenol-Formaldehyde
EF	Emission factor	Pb	Lead
EPA	US Environmental Protection Agency	PCD	Pollution Control Device
		PM	Particulate matter
EPI	Epichlorohydrin	PM ₁₀	Particulate matter less than 10 microns in size
EU	Emissions Unit		
FCAA	Federal Clean Air Act	ppmv	Parts per million by volume
FSA	Fuel sampling and analysis	ppm	Parts per million
gr/dscf	Grain per dry standard cubic foot (1 pound = 7000 grains)	PSEL	Plant Site Emission Limit
HAP	Hazardous Air Pollutant as defined by OAR 244-0040	psia	pounds per square inch, actual
		RTO	Regenerative Thermal Oxidizer
HCFC	Halogenated Chloro-Fluoro-Carbons	SERP	Source emissions reduction plan
		SO ₂	Sulfur dioxide
HCOH	Formaldehyde	ST	Source test
ID	Identification number	UF	Urea Formaldehyde
I&M	Inspection and maintenance	UFC	Urea-Formaldehyde Concentrate
LRAPA	Lane Regional Air Pollution Authority	VE	Visible emissions
		VMT	Vehicle miles traveled
M	1,000	VOC	Volatile organic compounds
MM	1,000,000		
MB	Material Balance		

INTRODUCTION

1. This is an existing facility applying for a new Title V federal operating permit.

In accordance with OAR 340-028-2200(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION

2. Georgia-Pacific Resins, Inc. (GP Resins) owns and operates a synthetic resin manufacturing facility located at 2665 Highway North in Eugene, Oregon.

FACILITY DESCRIPTION

3. GP Resins purchased this facility from Pacific Resins and Chemicals in November of 1981. While owned by Pacific Resins and Chemicals, the facility operated a formaldehyde plant, which ceased operation in 1980. Emissions from the formaldehyde plant were not banked and are not considered part of GP Resin’s baseline emissions. Plant Site Emission Limit (PSEL) calculations reflect only activities currently performed at the facility.

In September of 2002, GP Resins requested a determination from LRAPA regarding the major source status of the facility. Because the Georgia-Pacific Corporation Prairie Road Panelboard Plant (GP-Prairie Road) Title V facility is adjacent to and under common ownership with the GP Resins facility, and because the combine emissions from both facilities are more than 10 tons of methanol per year, GP Resins was determined to be a major source for Hazardous Air Pollutants (HAPs). LRAPA and GP Resins determined that it would be more practical to issue two (2) separate Title V permits – one (1) for each source. This permit contains requirements for the GP Resins facility only. The GP-Prairie Road Title V facility currently has been issued LRAPA Permit No. 203102.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

4. The emissions units at this facility are the following:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Boiler	B-1	None	NA
Emergency Generator (part of the Aggregate Insignificant EU)	EG-1	None	NA
Resin Kettles	OX-1	Regenerative Thermal Oxidizer	RT0
Process Weigh Tank (Formaldehyde)	WT-1	Vapor Balance System	Vbal-3

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Process Weigh Tank (Phenol)	WT-3	Vapor Balance System	Vbal-4
Process Weigh Tank (Prepolymer)	WT-4*	None	NA
Process Weigh Tank (PF Resin)	WT-7*	None	NA
Urea Transfer System	Urea*	2 Baghouses (1 on Weigh Hopper, 1 on Storage Silo)	BH-1, BH-2
Resimixer	Resi-Mix*	Baghouse	BH-3
Dry Chemical Blower	Salt*	Baghouse	BH-4
Prepoly	Prepoly*	None	NA
Dimethyl Glutarate Storage Tank	301*	None	NA
Polyamide Resin Tanks	Polyamide Resin Tanks*	None	NA
Methanol Distillate Tank 703	703*	None	NA
Formic Acid Storage Tank	305*	None	NA
Acid Quench Storage Tank	AQ-1*	None	NA
PF Resin Tanks	PF Resin Tanks*	None	NA
UF Resin Tanks	UF Resin Tanks*	None	NA
Phenol Storage Tanks 302, 303	Phenol Storage Tanks*	None	NA
Formaldehyde Storage Tanks 304, 306	Formaldehyde Storage Tanks*	None	NA
Urea-Formaldehyde Concentrate (UFC) Storage Tank 308	UFC Storage Tank*	None	NA
Diethylenetriamine (DETA) Storage Tank 701	DETA Storage Tank*	None	NA
Prepolymer Storage Tank 298, 704, 705	Prepolymer Storage Tanks*	None	NA
Methanol Storage Tank 800	Methanol Storage Tank*	Vapor Balance-1	Vbal-1
Epichlorohydrin Storage Tanks 801, 802	Epichlorohydrin Storage Tanks*	Vapor Balance-2	Vbal-2
Rosin Size Storage Tank 900	Rosin Size Storage Tank*	None	NA
Diesel Fuel Storage Tank	DF-1*	None	NA
Precatalyst Storage Tank 307, 309	Precatalyst Storage Tanks*	None	NA
Waste Resin Pile Emissions	WRP*	None	NA

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Loading Rack for Methanol, UFC Loading into Trucks, Methanol Distillate Loading into Trucks	Load-1*	Vapor Balance System (UFC Loading and Methanol Distillate Loading Do Not Use the Vapor Balance System)	Vbal-1
Truck or Railcar Loading of Resin	Load-2*	None	NA
Cooling Tower Emissions	CT-1	None	NA
Truck Washing Emission Estimates	TW-1*	None	NA
Process Piping and Component Leak Emission Estimates -- Raw Material Handling	LDAR	None	NA
Paved Roads	PR-1*	None	NA
Unpaved Roads	UPR-1*	None	NA
Aggregate Insignificant includes: Emergency Generator, Thermal Oxidizer Supplemental Burner (natural gas)	AI	None	NA

*Denotes emission units included in "Miscellaneous EU"

5. Subpart W NESHAP Requirements: The emissions unit regulated by these requirements is the EU-LDAR. For Wet Strength Resin Manufacturers, Subpart W requires that the facility follow all requirements in the Subpart H NESHAP.

The facility is subject to several individual standards, as required by Subpart H, including:

- 5.a. Applicable Requirement: Applicability and designation of source [40 CFR 63.160(a)]
- 5.b. Standards: General [40 CFR 63.162(a),(c),(d),(f), (g) , and (h)]
- 5.c. Standards for Pumps in Light Liquid Service [40 CFR 63.163]
- 5.d. Standards for Compressors [40 CFR 63.164]
- 5.e. Standards for Pressure Relief Devices in Gas/Vapor Service [40 CFR 63.165]
- 5.f. Standards: Sampling Connection Systems [40 CFR 63.166]
- 5.g. Standards for Open-ended Valves or Lines [40 CFR 63.167]
- 5.h. Standards for Valves in Gas/Vapor Service and Light Liquid Service [40 CFR 63.168]
- 5.i. Standards for: Pumps, Valves, Connectors, and Agitators in Heavy Liquid Service, Instrumentation Systems, and Pressure Relief Devices in Liquid Service. [40 CFR 63.169]
- 5.j. Standards for Surge Control Vessels and Bottoms Receivers [40 CFR 63.170]
- 5.k. Standards for Delay of Repair [40 CFR 63.171]
- 5.l. Standards for Closed-vent Systems and Control Devices [40 CFR 63.172]
- 5.m. Standards for Agitators in Gas/Vapor Service and in Light Liquid Service [40 CFR 63.173]
- 5.n. Standards for Connectors in Gas/Vapor Service and in Light Liquid Service [40 CFR 63.174]

6. Subpart OOO NESHAP Requirements: The emissions units regulated by these requirements are the EU-OX-1, EU-Formaldehyde Weigh Tanks, EU-Phenol Weigh Tanks, and EU-CT-1. These requirements for manufacturers of Amino/Phenolic Resins require that HAP emissions from the batch process vents (from the two (2) resin kettles at the facility) be reduced by 83 weight percent. The rules also require that the weigh tank emissions be reduced by 62 weight percent, which the facility intends to meet by routing the vapor emissions from the tanks to storage tanks through the use of a vapor balance system. In addition, the rules also require that heat exchange systems (cooling tower) meet the standards of Subpart F-National Emission Standards for Organic Hazardous Air Pollutants from the Synthetic Organic Chemical Manufacturing Industry. Subpart F contains work practice and operational requirements.
7. Boiler (EU-Boiler-1): This unit includes the main boiler at the facility. Emissions from the Emergency Generator (EU-EG1) and the Thermal Oxidizer Supplemental Burner are included in the Aggregate Insignificant emission unit. The boiler in EU-B-1 is rated at 61.67 MM BTU/hr and is natural gas-fired with No. 2 oil as a backup. PSELs for the boiler are based on the highest emissions for each pollutant considering each fuel species. The boiler will be required to comply with the Boiler MACT (Subpart DDDDD) within approximately three (3) years as an existing source.
8. Miscellaneous EU (EU-Miscellaneous EU): This unit includes various emission units at the facility including storage tanks and other activities. The miscellaneous EU units were grouped together to simplify the permit. The requirements include limits on visible emissions as well as the NSPS Subpart Kb applicable requirements for storage tanks. Part of the facility will also be subject to the Organic Liquid Distribution MACT (Subpart EEEE) in the coming years.
9. Aggregate Insignificant (AI): Includes the Emergency Generator and Thermal Oxidizer Supplemental Burner (natural gas), as well as various process tanks.

Categorically Insignificant Activities: The facility has the following categorically insignificant activities:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under divisions 200 through 268 excluding divisions 248 and 262 of this chapter, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Services Annual Report on Carcinogens when usage of the chemical mixture is less than 1000,000 pounds/year.
- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Food service activities
- Janitorial activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- Instrument calibration
- Maintenance and repair shop
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems.
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities.
- Temporary construction activities

- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Air purification systems
- Instrument air dryers and distribution
- Process raw water filtration systems
- Fire suppression
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Health, safety, and emergency response activities
- Emergency generators and pumps used only during loss of primary equipment or utility service
- Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems
- Non-contact steam vents on condensate receivers, deaerators and similar equipment
- Boiler blowdown tanks
- Industrial cooling towers that do not use chromium-based water treatment chemicals
- Oil/water separators in effluent treatment systems
- Combustion source flame safety purging on startup

Aggregate Insignificant Activities

10. Aggregate insignificant emissions from activities identified by GP Resins are detailed in the following table:

Emissions Source	Pollutants (tons/yr)				
	PM/ PM ₁₀	VOC	SO ₂	CO	NO _x
Emergency Generator	0.2	0.3	0.2	0.7	--
Thermal Oxidizer Supplemental Burner (natural gas and propane)	0.025	0.02	0.002	0.28	0.5
Resi-Mix Resin Storage Tanks	--	--	--	--	--
Prepolymer Storage Tanks	--	--	--	--	--

Emissions Source	Pollutants (tons/yr)				
	PM/ PM ₁₀	VOC	SO ₂	CO	NO _x
Precatalyst Storage Tanks	--	--	--	--	--
Nova-Cote Storage Tank	--	--	--	--	--
Wash Water Storage Tanks	--	--	--	--	--
Rosin Sizing Storage Tank	--	--	--	--	--
Process Weigh Tank-Resi Mix	--	--	--	--	--
Truck Wash Water	--	--	--	--	--
Vacuum Seal Water Tank	--	--	--	--	--
Totals	0.225	0.32	0.20	0.98	0.5

“ -- “ Denotes that the source emits the pollutant in negligible amounts

EMISSION LIMITS AND STANDARDS

11. ACDP Conditions

The following condition does not appear in the federal operating permit as it existed in the ACDP because of reason given below:

ACDP 203129 Condition 2: “Storage and Loading of Rosin Sizing” Emission unit was removed because there are no VOC emissions from this unit.

The change has been approved for the reason given.

12. Facility-wide Requirements:

12.a. Condition 4 of the permit establishes ‘reasonable precautions’ for the prevention of fugitive, visible particulate matter for this facility. Monitoring and recordkeeping for this requirement includes periodic visible emission surveys and corrective action if a source of visible emissions is identified.

- 12.b. Condition 6 of the permit states two (2) of LRAPA's limits for emissions that can create nuisance problems: odors and large-size fallout particulate matter. Monitoring for this condition is the maintenance of a complaint log and timely resolution.
- 12.c. Condition 8 of the permit requires that the facility develop an inspection and maintenance plan for use in scheduling control device and emitting equipment inspections and to ensure that necessary maintenance is performed for equipment that can determine emission rates at this facility.
- 12.d. Condition 9 of the permit requires that the facility submit a preplanned abatement strategy if requested by LRAPA. The abatement strategy would be required for the emergency air pollution episodes as defined in LRAPA's Title 51.
- 12.e. Condition 11 of the permit is a standard Title V permit condition related to the Federal Risk Management Planning program (40 CFR Part 68). The condition requires that Title V sources comply with 40 CFR 68 if changes at the facility make it subject.

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION

Baseline Emission Rate (BER) Information

- 13. In 1978, the facility was owned and operated by Pacific Resins and Chemicals. In addition to resin manufacturing, Pacific Resins operated a formaldehyde plant which ceased operation in 1980. In November of 1981, the plant was purchased by Georgia-Pacific Resins which operated only the resin manufacturing facility. Particulate and gaseous emissions for the 1978 baseline reflect only the resin manufacturing facility and are established below using current emission factors. Estimations of the BER are included in the attachment to this report.

CURRENT PLANT SITE EMISSION LIMITS

- 14. The plant can be operated as much as 24 hours per day, 7 days per week, and 52 weeks per year.

Plant Site Emission Limits (PSELs)

- 15. Components of the PSEL

Pollutant	Netting Baseline (tons/yr)	Components of the PSEL		
		Assigned PSEL (tons/yr)	Pollutant	Unassigned PSEL (tons/yr)
PM	2.5	12.4	PM	0
PM ₁₀	2.5	12.4	PM ₁₀	0
CO	4.5	32.1	CO	0
NO _x	17.8	27.2	NO _x	0

Pollutant	Netting Baseline (tons/yr)	Components of the PSEL		
		Assigned PSEL (tons/yr)	Pollutant	Unassigned PSEL (tons/yr)
SO ₂	9.1	45.7	SO ₂	0
VOC	2.7	18.1	VOC	0
Pb	0.0002	0.00098	Pb	0

For the assigned PSEL, the total annual tons per year are required to be determined as a rolling 12-month total.

16. The short-term PSELs (monthly) are shown below:

Emissions Unit(s)	Pollutant(s)	PSEL (lbs/hour)
B-1	PM/PM ₁₀	0.88
BH-1	PM/PM ₁₀	0.24
BH-2	PM/PM ₁₀	0.48
BH-3	PM/PM ₁₀	0.025
BH-4	PM/PM ₁₀	0.12
CT-1	PM/PM ₁₀	0.38
PR-1	PM/PM ₁₀	0.18
UPR-1	PM/PM ₁₀	0.92
B-1	SO ₂	31.3
B-1	NO _x	8.8
B-1	Pb	6.65 E-04
B-1	CO	22.0
B-1	VOC	0.34
OX-1	VOC	3.7
WT-1	VOC	0.02
WT-3	VOC	0.02
Miscellaneous*	VOC	202.7

*Miscellaneous EU contains multiple EUs as denoted in permit Condition 3.

Hourly PSELs are based upon maximum design rates for the equipment at the facility and hence compliance with the short-term PSELs is assured and no hourly PSEL monitoring is required. The attachment to this report contains calculations of the PSELs.

SIGNIFICANT EMISSION RATE

17. The Plant Site Emission Limit increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 38 rules for all of the pollutants as shown below.

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Increase from Baseline (tons/year)	SER (tons/year)
PM	2.5	12.4	9.9	25
PM ₁₀	2.5	12.4	9.9	15
CO	4.5	32.1	27.6	100
NO _x	17.8	27.2	9.4	40
VOC	2.7	18.1	15.3	40
SO _x	9.1	45.7	36.6	40
Pb	0.0002	0.00098	0.0008	0.6

The table above shows that the facility does not have emissions of any pollutant greater than the SER.

HAZARDOUS AIR POLLUTANTS (HAPs)

18. The projected potential HAP emissions from GP Resins are shown in the table below. These emissions are calculated on the basis of proposed operation parameters and must be recalculated by the facility if production increases.

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Methanol	6.6
Formaldehyde	4.1
Phenol	1.7
Epichlorohydrin	3.8
Hydrochloric Acid	18.7
Total HAPs	34.9

The table above shows that the facility emits more than 10 tons per year of any single HAP (HCl) and more than 25 tons per year for any combination of HAPs, and is, therefore, a major source for HAPs. The facility is subject to the Subpart W Wet Strength Resin Manufacturer MACT, the Subpart OOO Amino/Phenol Resin Manufacturer MACT as well as other requirements referenced by the MACTs. The permit contains conditions and requirements from the MACT that are applicable to the facility.

STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

19. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended. Sections 601-618 of the act do not apply to the facility except that air-conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

MONITORING REQUIREMENTS

20. Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance do not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet Section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. In addition, the permit includes monitoring of operating parameters for the boilers and pollution control devices. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit.

The facility is required to record material production and throughput totals and to estimate actual emissions. The estimations are to be based upon production data, emission factors and estimation methods used in the facility's application or other LRAPA-approved method.

GENERAL TESTING REQUIREMENTS

21. This section is provided so that the facility and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the facility to conduct any more testing than was previously included in the permit. Although

the permit may not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the facility may elect to voluntarily conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

SOURCE TEST RESULTS

22. This facility conducted source tests on the RTO control device to satisfy the initial performance test for the Subpart OOO MACT. Test results indicate a destruction removal efficiency of 97.84% for total hydrocarbon compounds.

RECORDKEEPING REQUIREMENTS

23. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating long-term plant site emissions. Short-term emission rates are based on maximum potential emissions and, therefore, compliance with the short-term PSELs is assured.

REPORTING REQUIREMENTS

24. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a log book attached to the annual report. Emissions fees reports are required annually.

GENERAL BACKGROUND INFORMATION

25. The proposed permit is a replacement of an existing Air Contaminant Discharge Permit (ACDP 203129) which was issued on August 2, 2000. The ACDP was originally scheduled to expire on August 1, 2005.
26. The facility is located in an area that has been designated as non-attainment for PM₁₀ and designated as attainment for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead.
27. The facility is located within 100 kilometers of two Class I air quality protection areas: Diamond Peak Wilderness area and Three Sisters Wilderness area.

COMPLIANCE HISTORY

28. The facility entered into a Stipulated Final Order (SFO 03-2521) on January 29, 2003, to resolve issues related to the facility becoming a major source and applying for a Title V permit. Civil penalties were issued in the sum of \$11,400 for three (3) separate violations related to the facility operating in excess of major source limits.

ADDITIONAL REQUIREMENTS

29. This facility is subject to federal regulations for New Source Performance Standards (NSPS) Subpart Kb for storage tanks.

PUBLIC NOTICE

30. This permit was originally placed on public notice from March 1, 2004 to March 31, 2004, but a slight increase in VOC PSELS (0.1 tons/year) was requested by the facility during the comment period. The requested increase in PSELS requires that the permit undergo another public comment period. Other minor changes were also made based on comments and suggestions from the facility.

This permit was on public notice from June 1, 2004, to July 1, 2004. No written comments were received during the comment period. The proposed permit was sent to EPA on August 2, 2004, for a 45-day review period. Because there were no substantive or adverse comments during the public comment period, LRAPA requested and EPA agreed to an expedited review. On August 10, 2004, LRAPA received the letter from EPA stating that this permit is eligible for issuance.

EMISSIONS DETAIL SHEETS

31. The emissions detail sheets are attached.

MH/bp
8/18/04