

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

Lane Regional Air Pollution Authority  
1010 Main Street  
Springfield, Oregon 97477  
Telephone: (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:

**Monaco Coach Corporation - Springfield**  
91320 Coburg Industrial Way  
Coburg, Oregon 97408

INFORMATION RELIED UPON:

Application Number: 205168  
Received: 10/13/97  
Revisions/Supplements: 9/8/99  
12/3/99  
7/13/00  
7/21/00  
10/12/00

PLANT SITE LOCATION:

5280 High Banks Road  
Springfield, Oregon 97478

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield  
Dated: September 6, 2000

ISSUED BY LANE REGIONAL AIR POLLUTION AUTHORITY

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Brian L. Jennison, Ph.D., Director

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Date

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Nature of Business:

Fiberglass Recreational Vehicle Parts

SIC:

3083

RESPONSIBLE OFFICIAL:

Title: Vice President  
Chief Administrative Officer

FACILITY CONTACT PERSON:

Name: Kurt W. Anderson  
Title: Director, EH&S  
Environment, Health & Safety  
Phone: (219) 862-7347

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

ACDP	Air Contaminant Discharge Permit
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CPMS	Continuous parameter monitoring system
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission factor
EPA	US Environmental Protection Agency
EU	Emissions Unit
FCAA	Federal Clean Air Act
FSA	Fuel sampling and analysis
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)
HAP	Hazardous Air Pollutant as defined by OAR 340-032-0130
HCFC	Halogenated Chloro-Fluoro-Carbons
ID	Identification number
I&M	Inspection and maintenance
LRAPA	Lane Regional Air Pollution Authority
NA	Not applicable
NO <sub>x</sub>	Nitrogen oxides
O <sub>2</sub>	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in size
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	pounds per square inch, actual
SERP	Source emissions reduction plan
SO <sub>2</sub>	Sulfur dioxide
ST	Source test
VE	Visible emissions
VMT	Vehicle miles traveled
VOC	Volatile organic compounds

**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]
  
2. All conditions in this permit are federally enforceable and state enforceable except Conditions 21.a and 21.b, which are only enforceable by LRAPA. [OAR 340-218-0060]

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

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

Emission Unit Description	EU ID	Pollution Control Device Description
Fiberglass: 5 Fiberglass Chop Stations	FG	VOC/HAP content limits and particulate filters
Gel Coat Area: 4 Gel Coat Booths	GC	VOC/HAP content limits and particulate filters
Tooling: Mold Building And Tooling	TM	VOC/HAP content limits and particulate filters
Coatings: 1 Coating Booth	PB	VOC/HAP content limits and particulate filters
Welding	WE	None
Woodworking	WO	Fabric filters
Fiberglass Grinding: 3 Grinding Booths	GB	Fabric filters
Polymer Cast Resin Sanding	PS	Fabric filters
Fuel-burning Equipment	FB	None
RV Service	RV	None
Parts 2000: (FG, GC, TM, and PB)	Parts	VOC/HAP content limits and particulate filters
Plastic 2000: (FG, GC, and TM)	Plastics	VOC/HAP content limits and particulate filters

**EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS**

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

**Table 1. Facility-Wide Emission Limits And Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
48-015(2)	3	Fugitive particulate emissions	Minimize	NA	NA	4
32-010(1)	7	Visible emissions	20% opacity	3-minutes	8	9
32-015(2)	12	PM emissions	0.1 gr/dscf	NA	13	14
32-007	17	Operation and Maintenance	Proper Operation and Maintenance	NA	NA	18
49-010	21.a	Odors	No nuisance	NA	NA	22
32-055	21.b	PM >250µ	No fallout	NA	NA	22
40 CFR Part 68	25	Risk management	Risk management plan	NA	NA	NA

3. Applicable Requirement: Fugitive Particulate Emissions [LRAPA 48-015(2)]

- 3.a. The permittee shall not allow or permit 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. Such reasonable precautions shall include, but not be limited to the following.
  - 3.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;
  - 3.a.ii. application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - 3.a.iii. full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - 3.a.iv. installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - 3.a.v. adequate containment during sandblasting or other similar operations;
  - 3.a.vi. covering, at all times when in motion, open-bodied trucks transporting materials likely to become airborne; and
  - 3.a.vii. the prompt removal, from paved areas, earth or other material, which does or may become airborne.

4. Monitoring Requirement: Fugitive Particulate Emissions

- 4.a. At least once each month, the permittee shall visually survey the plant for sources of fugitive particulate emissions. For the purpose of this permit, sources of fugitive particulate emissions are considered to be any dry material that may become airborne. If sources of fugitive particulate emissions are identified, the permittee shall:
  - 4.a.i. take corrective action within 24-hours to minimize fugitive particulate emissions. Corrective actions may include but are not limited to those actions identified in Condition 3.

5. Reporting Requirement: Fugitive Particulate Emissions
  - 5.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.
  
6. Recordkeeping: Fugitive Particulate Emissions
  - 6.a. The permittee shall maintain records of fugitive particulate emissions surveys and corrective actions.
  - 6.b. All records shall be collected and maintained in accordance with Condition 48.
  
7. Applicable Requirement: Visible Emissions [LRAPA 32-010(1)(B) & (3)]
  - 7.a. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from any non-combustion source for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water.
  
8. Testing Requirement: Visible Emissions
  - 8.a. Modified EPA Method 9 shall be used to determine opacity, in accordance with ODEQ's *Source Sampling Manual*. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or observation conducted. Each observation period shall be a minimum of six (6) minutes unless any one reading equals or exceeds 20% opacity. If one reading equals or exceeds 20% opacity, the observation period shall be a minimum of 60 minutes, or until a violation of the emissions standard has been documented; whichever is a shorter period.
  
9. Monitoring Requirement: Visible Emissions
  - 9.a. The permittee shall monitor emissions from each exhaust stack or vent in accordance with the following procedures and frequencies:
    - 9.a.i. The permittee shall conduct a Modified Method 9 visible emissions observation weekly on each exhaust stack or vent.
    - 9.a.ii. If the visible emissions observations conducted during six (6) consecutive weeks of operation show opacity within the applicable limits (< 20% opacity) the observation frequency may be reduced to once per month.
    - 9.a.iii. If the visible emissions observations conducted during four (4) consecutive months of operation show opacity within the applicable limits (< 20% opacity) the observation frequency may be reduced to once per quarter.
    - 9.a.iv. If an exceedance of the opacity limit (20% opacity) occurs, the frequency of visible emissions observations shall be increased to weekly until the criteria for reducing the frequency of observations, as specified in this condition, is satisfied.
  - 9.b. Visible emissions testing, using Modified Method 9, may be waived if the following conditions are met:
    - 9.b.i. The permittee conducts a six (6) minute visible emissions observation in accordance with the schedule specified in this condition and using EPA Method 22; and
    - 9.b.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the observation time. If visible emissions are detected for more than 18 seconds of any six-minute visible

emissions observation, the permittee must conduct the Modified Method 9 as specified in Condition 9.a.

10. Recordkeeping Requirement: Visible Emissions
  - 10.a. The permittee shall maintain records of all visible emissions observations and results.
  - 10.b. All visible emissions tests and/or observations shall be recorded in a log. The information recorded shall include the following:
    - 10.b.i. Name of observer
    - 10.b.ii. Date of observation(s)
    - 10.b.iii. Time of observation(s)
    - 10.b.iv. Operating conditions during observation(s)
    - 10.b.v. Results of observation(s)
  - 10.c. All records shall be collected and maintained in accordance with Condition 48.
11. Reporting Requirement: Visible Emissions
  - 11.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.
12. Applicable Requirement: Particulate Emissions [LRAPA 32-015(2)]
  - 12.a. The permittee shall not cause or allow the emission of PM to exceed 0.1 grains per dry standard cubic foot for any air contaminant source.
13. Testing Requirement: Particulate Emissions
  - 13.a. This permit does not require periodic testing, except as specified in Condition 14.
  - 13.b. If testing is required, the permittee shall test in accordance with the methods and procedures specified in the ODEQ's *Source Sampling Manual*.
14. Monitoring Requirement: Particulate Emissions
  - 14.a. Periodic monitoring of particulate emissions is satisfied while the permittee is in compliance with the visible emissions limit in Condition 7 and the operation and maintenance requirements in Condition 17.
  - 14.b. Whenever two exceedances of either the visible emissions limit occur during a 12-month period, the permittee shall demonstrate compliance with the particulate emissions limit through testing, within 60 days of the second exceedance, as specified in Condition 13.
15. Recordkeeping Requirement: Particulate Emissions
  - 15.a. The permittee shall maintain records of all inspections, maintenance actions, and repairs to all particulate control equipment.
  - 15.b. All records shall be collected and maintained in accordance with Condition 48.
16. Reporting Requirement: Particulate Emissions
  - 16.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.

17. Applicable Requirement: Operation and Maintenance Requirements [LRAPA 32-007]
  - 17.a. The permittee shall operate and maintain all air contaminant-generating processes in a manner that minimizes emissions of air contaminants.
  - 17.b. The permittee shall train all employees involved in operation and maintenance of particulate control devices. Training shall include techniques for proper set up, maintenance, operation, and repair of particulate control systems.
18. Monitoring Requirements: Operation and Maintenance Requirements
  - 18.a. The permittee shall maintain a log of all training activities.
  - 18.b. The permittee shall conduct refresher training annually.
19. Recordkeeping Requirement: Operation and Maintenance Requirements
  - 19.a. The permittee shall maintain records of all training activities and training materials.
  - 19.b. All records shall be collected and maintained in accordance with Condition 48.
20. Reporting Requirement: Operation and Maintenance Requirements
  - 20.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.
21. Applicable Requirement: Nuisance Conditions [LRAPA 49-010 and 32-055]
  - 21.a. The permittee shall not cause or permit the emission of odorous matter in such a manner as to cause a public nuisance in accordance with LRAPA 49-010. This condition is enforceable only by LRAPA.
  - 21.b. The permittee shall not cause or permit the emission of any particulate matter larger than 250 microns in size provided such particulate matter does or will deposit upon real property of another person in accordance with LRAPA 49-010. [LRAPA 32-055] This condition is enforceable only by LRAPA.
22. Monitoring Requirement: Nuisance Conditions
  - 22.a. The permittee shall provide LRAPA with written notification within ten (10) days of all nuisance complaints received by the permittee in writing, via letter, telephone, or facsimile, and shall maintain a log of each complaint. Documentation shall include date of contact, time of reported nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the complaint period, and time of response to complainant. A plant representative shall promptly investigate the condition following the receipt of the nuisance complaint and a plant representative shall provide a response to the complainant within 24 hours, if possible.
23. Recordkeeping Requirement: Nuisance Conditions
  - 23.a. All records shall be collected and maintained in accordance with Condition 48.
24. Reporting Requirement: Nuisance Conditions
  - 24.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.

25. Applicable Requirement: Risk Management Plan
- 25.a. Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee shall 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]

**Table 2. Emissions Unit: Parts 2000**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
38-020(1)(A) – BACT	26	VOC	VOC Content Limits	Monthly	27.b.i.A	27
38-020(1)(A) – BACT	29	VOC	VOC Content Limits (Coatings)	Monthly	30.b.i.A	30
38-020(1)(A) – BACT	33	VOC	Work Practices	NA	NA	34

**Best Available Control Technology Limits and Standards**

26. Applicable Requirement: VOC Content Limits [LRAPA 38-020(1)(A)]
- 26.a. The VOC contents of all resins and gel coats used in Parts 2000 shall not exceed the limits contained in the following table:

Resin or Gel Coat	VOC Content, Weight Percent
Non-corrosion resistant resin (unfilled)	32
Non-corrosion resistant resin (filled)	35
Tooling resin	48
Pigmented gel coat	27
Clear gel coat	45
Tooling gel coat	43
Polymer casting resin	38

27. Monitoring and Recordkeeping Requirements: VOC Content Limits
- 27.a. The permittee shall demonstrate compliance with VOC Content Limits in Condition 26 within thirty days of the end of each month.
- 27.b. The permittee shall record the VOC content of each resin and gel coat used in a format that readily identifies the applicable permit limit and material type.
- 27.b.i. Certified product data sheets (CPDS), material safety data sheets (MSDS), or manufacturers product specification sheets may be used to provide VOC content for resin and gel coat.

- 27.b.i.A. Although this permit does not require testing of raw materials to determine VOC content, LRAPA may require testing using EPA Method 311 (or approved alternative method) to confirm the VOC content of resins and gel coats.
- 27.b.i.B. Where a material supplier or manufacturer reports the VOC content data as a range of values, the upper limit of that range will be used for determining compliance.
- 27.c. All records shall be collected and maintained in accordance with Condition 48.
- 28. Reporting Requirement: VOC Content Limits
  - 28.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.
- 29. Applicable Requirement: VOC Content Limits (Coatings) [LRAPA 38-020(1)(A)]
  - 29.a. The VOC content of each coating material as applied, other than gel coats and resins, shall not exceed 2.8 pounds VOC per gallon, less water and exempt compounds.
- 30. Monitoring Requirement: VOC Content Limits
  - 30.a. The permittee shall demonstrate compliance with the VOC Content Limits in Condition 29 within thirty days of the end of each month.
  - 30.b. The permittee shall record the VOC content of each resin and gel coat used in a format that readily identifies the applicable permit limit and material type.
    - 30.b.i. Certified product data sheets (CPDS), material safety data sheets (MSDS), or manufacturers product specification sheets may be used to provide VOC contents for coatings and solvents.
      - 30.b.i.A. Although this permit does not require testing of raw materials to determine VOC content, LRAPA may require testing using EPA Method 311 (or approved alternative method) to confirm the reported VOC content of coatings and solvents.
      - 30.b.i.B. Where a material supplier or manufacturer reports the VOC content data as a range of values, the upper limit of that range will be used for determining compliance.
  - 30.c. When averaging, the permittee shall calculate the average VOC content of each coating using the following equation:

$$M_{VOC} = (W_S - W_W - W_{ES}) / (V_M - V_W - V_{ES})$$

where:

- $M_{VOC}$  = VOC content of coating, minus water and exempt solvents (lbs VOC/gal-coating);
- $W_S$  = weight of volatile compounds (lbs);
- $W_W$  = weight of water (lbs);
- $W_{ES}$  = weight of exempt compounds (lbs);
- $V_M$  = volume of coating (gal);

$V_W$  = volume of water (gal); and  
 $V_{ES}$  = volume of exempt compounds.

- 30.c.i. When the coating formulation remains unchanged from one month to the next, the permittee may reference the previous month's calculation.
- 30.d. If the VOC content of coatings ( $M_{VOC}$ ) as applied is not greater than 2.8 pounds VOC per gallon, less water and exempt compounds, then the permittee is in compliance with the VOC content limit in Condition 29.
31. Recordkeeping Requirement: VOC Content Limits
- 31.a. The permittee shall maintain records of VOC content calculations required in Condition 30.
- 31.b. All records shall be collected and maintained in accordance with Condition 48.
32. Reporting Requirement: VOC Content Limits
- 32.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.
33. Applicable Requirement: Work Practices [LRAPA 38-020(1)(A)]
- 33.a. All surface coatings and finishes other than polyester resins and production gel coats shall be applied with high-volume low-pressure (HVLP) spray gun technology. HVLP is technology used to apply coatings while operating between one-tenth (0.1) and ten (10) pounds per square inch gauge air pressure measured at the center of the air cap and at the air horns of the spray system. Other coating application methods that have been demonstrated to achieve equivalent or better transfer efficiency (65%) may be used with prior written approval from LRAPA.
- 33.b. All resins and production gel coats shall be applied manually or with the use of non-atomized application technology. Non-atomized application technology means any mechanical application technology in which the resin or gel coat is not atomized or broken into droplets or aerosols as it is applied to the part being manufactured. This technology includes, but is not limited to, flow coaters, pressure fed rollers, and resin impregnators.
- 33.c. All VOC-containing material must be mixed in containers with a cover having no visible gaps in place at all times. This requirement does not apply when material is being manually added to or removed from a container, or when mixing or pumping equipment is being placed in or removed from a container. This requirement does not apply to material mixed in containers smaller than forty (40) gallons.
- 33.d. All VOC-containing materials must be stored in normally closed containers with no visible gaps at all times;
34. Monitoring Requirements: Work Practices
- 34.a. The permittee shall train all employees involved in the operation or maintenance of any application equipment, pollution control equipment, or material mixing or storage facility. Training shall include techniques for proper equipment set up, cleaning, maintenance, and operation, as well as, proper mixing, storage, and disposal of resins, gel coats, and coatings.
- 34.b. The permittee shall maintain a log of all training activities.
- 34.c. The permittee shall conduct refresher training annually.

- 35. Recordkeeping Requirement: Work Practices
  - 35.a. The permittee shall maintain records of all training activities and training materials.
  - 35.b. All records shall be collected and maintained in accordance with Condition 48.
- 36. Reporting Requirements: Work Practices
  - 36.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.

**Table 3. Emissions Unit: Plastics 2000**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
OAR 340-244-0200	37	HAP	HAP Emissions Limit			38

**Maximum Achievable Technology Limits**

- 37. Applicable Requirement: MACT Standard
  - 37.a. The permittee shall comply with all applicable requirements and emissions standards contained in 40 CFR Part 63 Subpart WWWW – National Emission Standards for Hazardous Air Pollutants: Reinforced Plastic Composites Production upon promulgation of the standard.
  - 37.b. The permittee shall apply for a permit modification to incorporate the requirements of Subpart WWWW into the Title V permit within 180 days of promulgation of the standard.
- 38. Monitoring and Recordkeeping Requirements: MACT Standard
  - 38.a. The permittee shall demonstrate compliance and commence continuous compliance monitoring as specified in 40 CFR 63 Subpart WWWW upon promulgation of the standard.

**PLANT SITE EMISSION LIMITS [LRAPA 34-060]**

39. The plant site emissions shall not exceed the following:

Pollutant	Plant Site Emission Limit ton/year
PM	6.4
PM <sub>10</sub>	6.4
CO	NA
NO <sub>x</sub>	1.56
SO <sub>2</sub>	NA
VOC	73.0

Emissions Unit	Process Parameter	Pollutant(s)	Measurement Technique	Measurement Frequency
Parts 2000	VOC-containing materials used (gallons or pounds or tons)	VOC	Recordkeeping	Monthly
Woodworking	Dry material collected (pounds)	PM and PM <sub>10</sub>	Recordkeeping	Monthly
Polymer Cast Resin Sanding	Dry material collected (pounds)	PM and PM <sub>10</sub>	Recordkeeping	Monthly
Parts 2000	Gel Coat	PM and PM <sub>10</sub>	Recordkeeping	Monthly

40. **Monitoring Requirement:** Plant Site Emission Limit (VOC)

40.a. The permittee shall collect and maintain the following information for demonstrating compliance with the PSELs:

40.b. The permittee shall maintain usage records of all materials that contain VOCs and calculate, by the end of each succeeding month, the 12-month total VOC emissions using the following equation:

$$E = E_1 + E_2$$

where:

E = VOC emission in tons/year;

and:

$$E_1 = [\sum (RM_i \times D_i \times VOC_i \times EF_i) - W] \times K$$

where:

- RM<sub>i</sub> = Amount of each type of raw material used in pounds or gallons per month and pounds or gallons per year, recorded pursuant to Condition 41;
- D<sub>i</sub> = Density of each type of raw material used in pounds/gallon from CPDS or MSDS (density applied only to materials measured by volume);
- VOC<sub>i</sub> = VOC content of raw materials (% by weight from CPDS or MSDS);
- EF<sub>i</sub> = Emission factor for each type of raw material used: Assume 1.0 lb/lb for VOC-containing materials other than resins and gel coats. For resin and gel coat, calculate VOC emissions using equation E<sub>2</sub> below.
- K = Conversion constant: 1 ton/2000 lbs; and
- W = Amount of VOCs shipped offsite as waste in lbs.

and:

$$E_2 = [\sum (RM_i \times EF_i)] \times K$$

where:

- RM<sub>i</sub> = Amount of each type of raw material used in pounds per month and pounds per year, recorded pursuant to Condition 41.a;
- EF<sub>i</sub> = Emission factor for each type of raw material used: See Review Report Attachment A for gel coat, resin, and methyl methacrylate; and
- K = Conversion constant: 1 ton/2000 lbs.

41. Recordkeeping Requirement: Plant Site Emission Limit (VOC)

41.a. The permittee shall maintain the following records:

Type and amount of each VOC-containing material used;

- 41.a.i. Density of each VOC-containing material used;
- 41.a.ii. VOC content of each VOC-containing material used;
- 41.a.iii. Methods of application for each VOC-containing materials; and

41.b. All records shall be collected and maintained in accordance with Condition 48.

42. Reporting Requirement: Plant Site Emission Limit (VOC)

42.a. The permittee shall submit monitoring reports and compliance certifications in accordance with Conditions 49 and 50.

43. Monitoring Requirement: Plant Site Emission Limit (Particulate Matter)

43.a. The permittee shall use the following formula to calculate particulate emissions for each emission unit that vents to the atmosphere:

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

where:

- E = pollutant emissions -lb/hr, lbs/day, or tons/month, as applicable

$P_{eu}$  = process parameter identified in Condition 40.a.  
 $EF_{eu}$  = emission factor identified for each emission unit and pollutant in the following table:

Emissions Unit	Pollutants	Emission Factor	Emission Factor Units
Parts 2000	PM, and PM <sub>10</sub>	.02	Lb/lb
Woodworking	PM and PM <sub>10</sub>	.02	Lb/lb
Polymer Cast Resin Sanding	PM and PM <sub>10</sub>	.02	Lb/lb

**Insignificant Activities Emission Limits and Standards**

- 44. LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions [OAR 340-200-0020] exist at facilities required to obtain a 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:
  - 44.a. LRAPA 32-0110(1)(8) (20% opacity)
  - 44.b. LRAPA 32-015 (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)
  - 44.c. LRAPA 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment)
- 45. Testing, Monitoring, and Recordkeeping Requirements: 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 OAR 340-208-0010 and perform the testing in accordance with ODEQ’s *Source Sampling Manual*.

**GENERAL TESTING REQUIREMENTS**

- 46. Unless otherwise specified in this permit, the permittee shall conduct all testing in accordance with ODEQ’s *Source Sampling Manual*. [OAR 340-212-0120]
  - 46.a. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
  - 46.b. Unless otherwise specified by permit condition or LRAPA -approved source test plan, all compliance source tests shall be performed at maximum operating rates (90 to 110% of device design capacity).

- 46.c. Each source test shall consist of at least three (3) test runs and the emissions results shall be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 46.d. Source test reports prepared in accordance with the ODEQ's *Source Sampling Manual* shall be submitted to LRAPA within 30 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

**GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS [OAR 340-218-0050(3)(a) and (b)]**

47. Monitoring Requirements:

- 47.a. The permittee shall not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
- 47.b. Methods used to determine actual emissions for fee purposes shall also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
- 47.c. Monitoring requirements shall commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

48. Recordkeeping Requirements:

- 48.a. The permittee shall maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)];
  - 48.a.i. the date(s) analyses were performed;
  - 48.a.ii. the company or entity that performed the analyses;
  - 48.a.iii. the analytical techniques or methods used;
  - 48.a.iv. the results of such analyses;
  - 48.a.v. the operating conditions as existing at the time of sampling or measurement; and
  - 48.a.vi. the records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
- 48.b. Unless otherwise specified by permit condition, the permittee shall 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 missing record(s) shall 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 shall document the reason for the missing record. In addition, any missing record that can be recovered from other available information shall not be considered a missing record. [OAR 340-214-0110, 340-212-0160, and 340-218-0050(3)(b)]
- 48.c. Recordkeeping requirements shall commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
- 48.d. Unless otherwise specified, the permittee shall 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 Contaminant Discharge Permit shall also be retained for five (5) years. [OAR 340-218-0050(b)(B)]

## REPORTING REQUIREMENTS

49. The permittee shall submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by LRAPA. Six month periods are January 1 to June 30, and July 1 to December 31. Two copies of the report shall be submitted to LRAPA and one copy to the EPA. All instances of deviations from permit requirements shall be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
  - 49.a. The first semi -annual report shall be due on August 15 and shall include the semi -annual compliance certification, OAR 340-218-0080.
  - 49.b. The annual report shall be due on March 1 and shall consist of the following:
    - 49.b.i. the emission fee report; [OAR 340-220-0100]
    - 49.b.ii. the NO<sub>x</sub> and VOC emission statement, if applicable; [OAR 340-214-0220];
    - 49.b.iii. the excess emissions upset log; [OAR 340-214-0340]
    - 49.b.iv. the second semi -annual compliance certification; and [OAR 340-218-0080]
    - 49.b.v. the annual certification that the risk management plan is being properly implemented; OAR 340-244-0230. [OAR 340-218-0080(7)]
50. The semi -annual compliance certification shall 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)]
  - 50.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 50.b. The identification of the method(s) or other means used by the owner or operator 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 shall include, at a minimum, the methods and means required under OAR 340-218-0050(3). If necessary, the owner or operator also shall 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;
  - 50.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in OAR 340-218-0040(6)(c)(B). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred; and
  - 50.d. Such other facts as LRAPA may require to determine the compliance status of the source;
51. Notwithstanding any other provision contained in any applicable requirement, the owner or operator 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)]

52. Excess Emissions Reporting [LRAPA 36-001 through 36-030]
- 52.a. The permittee shall report all excess emissions in accordance with LRAPA 36-001 through 36-030. In summary, the permittee shall immediately (i.e., as soon as possible but in no case more than one hour after the beginning of the excess emission period) notify LRAPA by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance. Notification shall, to the extent reasonably ascertainable at the time of notification, include the source name, nature of the emissions problem, name of the person making the report, name and telephone number of the contact person for further information, date and time of the onset of the upset condition, whether or not the incident was planned, the cause of the excess emission (e.g., startup, shutdown, maintenance, breakdown, or other), equipment involved in the upset, estimated type and quantity of excess emissions, estimated time of return to normal operations, efforts made to minimize emissions, and a description of remedial actions to be taken. Follow-up reporting shall be made in accordance with LRAPA direction and OAR 340-214-0330(2) and LRAPA 36-025.
- 52.b. Notification shall be made to LRAPA. The current LRAPA telephone number is (541) 736-1056.
- 52.c. In the event of any excess emissions that are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the Oregon Accident Response System (OARs). The current number is 1-800-452-0311.
- 52.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee shall submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required in OAR 340-214-0330 and LRAPA 36-15. New or modified procedures shall be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee shall abide by the approved procedures and have a copy available at all times.
- 52.e. The permittee shall notify LRAPA of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if the source is located in a nonattainment area for a pollutant that may be emitted in excess of applicable standards.
- 52.f. The permittee shall maintain and submit to LRAPA a log of planned and unplanned excess emissions, on LRAPA-approved forms, in accordance with LRAPA 36-025.
53. The permittee shall 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" means within seven (7) days of the deviation. Deviations that cause excess emissions, as specified in LRAPA 36-001 through 36-030 shall be reported in accordance with LRAPA 36-025. [OAR 340-218-0050(3)(c)(B)]
54. The permittee shall submit any required source test report within 45 days after the source test, unless otherwise approved in the source test plan. [OAR 340-218-0050(3)(c)(C) and LRAPA 34-070]
55. All required reports shall be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
56. Reporting requirements shall commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

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

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

DEQ – Air Quality Division  
811 SW Sixth Avenue  
Portland, OR 97204  
(503) 229-5359

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-107  
1200 Sixth Avenue  
Seattle, WA 98101  
(206) 553-4273

**NON-APPLICABLE REQUIREMENTS**

58. LRAPA and Federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability: [OAR 340-218-0110]

The permit application did not contain any non-applicable requirements.

**GENERAL CONDITIONS**

G1. General Provision

Terms not otherwise defined in the permit shall 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*; January 23, 1992 -- State Implementation Plan Volume 3, Appendix A4;
- b. *Continuous Monitoring Manual*; January 23, 1992 -- 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. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee shall 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 shall be supplemental to, and shall 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 shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G4. 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. [OAR 340-214-0120]

G5. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(d), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit shall contain certification by a responsible official of truth, accuracy and completeness. All certifications shall 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 shall promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G6. Open Burning [LRAPA Title 47]

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

- G7. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0200 through 340-248-0280 and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee shall comply with OAR 340-248-0200 through 340-248-0280, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

- G8. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

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

- G9. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit shall 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 shall 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.

- G10. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Lane Regional Air Pollution Authority, 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 LRAPA 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.

G11. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee shall 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 shall submit payment to Lane Regional Air Pollution Authority, 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 shall be submitted in writing to LRAPA. Payment shall be made regardless of the dispute. User-based fees shall be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G12. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee shall 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 OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), shall be submitted to LRAPA and the EPA.
- c. The permittee shall 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 G9 shall not extend to off-permit changes.

G13. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee shall 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 shall be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G9 shall not extend to Section 502(b)(10) changes.

G14. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit shall be requested and granted in accordance with OAR 340-218-0150. The permittee shall 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.

G15. Minor Permit Modification [OAR 340-218-0170]

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

G16. Significant Permit Modification [OAR 340-218-0180]

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

G17. Staying Permit Conditions [OAR 340-218-0050(6)(e)]

Notwithstanding Conditions G14 and G15, 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.

G18. Construction/Operation Modification [OAR 340-218-0190]

No permittee shall construct or make modifications required to be reviewed under OAR 340-218-0190, the construction/operation modification rules, without receiving a Notice of Approval in accordance with OAR 340-218-0190. The permittee should allow 60 days for LRAPA review of applications for a construction/operation modification if public notice is not required, or 180 days if public notice is required.

G19. New Source Review Modification [LRAPA Title 38]

No permittee shall construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (A CDP) (LRAPA 34-010). The permittee should allow 180 days for LRAPA review of an ACDP application for New Source Review.

G20. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

It shall 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.

G21. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

The permittee shall 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 shall also furnish to LRAPA copies of records required to be retained by the permit.

G22. 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 shall 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 shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

G23. 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.

G24. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

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

G25. 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).

G26. Property Rights [OAR 340-200-0020(9)(c) and 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.

G27. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

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

ALL INQUIRIES SHOULD BE DIRECTED TO:

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

DJ  
11/14/01