

ASSIGNMENT

to

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

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

PERMITTEE:

All True Designs, LLC
 4660 Main Street, Bldg. C, Ste. 450
 Springfield, Oregon 97478

INFORMATION RELIED UPON:

Application No.: 60479
 Date Received: May 19, 2015

PLANT SITE LOCATION:

4660 Main Street, Bldg. C, Ste. 450
 Springfield, Oregon 97478

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Springfield
 Date: 05/22/12

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Title 37 Section 37-0060-2 and based on the land use compatibility findings included in the permit record (note: land use compatibility statements are not applicable to portable sources).



Merlyn L. Hough, Director

FEB - 3 2016

Dated

General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description	SIC
AQGP-003	04/30/25	Fiberglass lay-up and/or reinforced plastics composites production, including but not limited to SIC codes 3083, 3089, 3562, 3823	3562

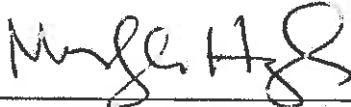
SUPPLEMENTAL INFORMATION:

Facility contact:		
Name:	Andrew Standerfer	
Phone number:	541-357-5363	
Facsimile number:	541-357-5264	
e-mail address:	andys@alltruedesigns.com	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	No	N/A
Reports Required:		
Annual	Yes	February 15th
NSPS	No	N/A
NESHAP	No	N/A
Other	No	N/A
Public Notice	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		

**GENERAL
AIR CONTAMINANT DISCHARGE PERMIT**

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

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

APR 30 2015

Dated

This permit is issued in accordance with the provisions of LRAPA Title 37, Section 37-0060 for the following source category:

Fiberglass lay-up and/or reinforced plastics composites production, including but not limited to SIC codes 3083, 3089, 3562, 3823

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1.0 PERMIT ASSIGNMENT

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):
- a. The permittee is operating fiberglass lay-up and/or reinforced plastics composites production as listed on the cover of this permit, including supporting activities.
 - b. Actual or expected emissions of any single Hazardous Air Pollutant (HAP) are less than 5 tons/year.
 - c. A Simple and Standard ACDP is not required for the source.
 - d. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Assignment** LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with LRAPA's Rules and Regulations and that LRAPA determines would be appropriately regulated by a General ACDP. LRAPA may rescind assignment if the permittee no longer meets the requirements of LRAPA Title 37, Section 37-0060 and the conditions of this permit.
- 1.3 Permitted Activities** This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a Standard Permit or additional General ACDPs, if applicable.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hours.
- 2.2 Particulate Matter Emissions** The permittee must comply with the following particulate matter emission limits, as applicable:

- a. Particulate matter emissions from any fuel burning equipment installed, constructed, or modified after June 1, 1970 must not exceed 0.1 grains per dry standard cubic foot, corrected to 12% CO₂ or 50% excess air.
- b. Particulate matter emissions from any air contaminant source, other than fuel burning equipment and fugitive emission sources, installed after June 1, 1970 must not exceed 0.1 grains per dry standard cubic foot.

2.3 Fugitive Emissions

The permittee must take reasonable precautions to prevent particulate matter from becoming airborne, such as but not limited to:

- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
- b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
- c. Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.

2.4 Particulate Matter Fallout

The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size to deposit upon the real property of another person. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled.

2.5 Nuisance and Odors

The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.

3.0 PLANT SITE EMISSION LIMITS

3.1 Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
PM	24	tons per year
PM ₁₀	14	tons per year
PM _{2.5}	9	tons per year
VOC	39	tons per year

3.2 Annual Period The annual plant site emissions limits apply to any 12-consecutive calendar month period.

4.0 COMPLIANCE DEMONSTRATION

4.1 VOC PSEL Compliance and HAP Monitoring for Coatings and Solvents *By the tenth working day of each month*, the permittee shall determine compliance with the VOC PSEL and estimate HAP emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant:
E= VOC from coatings and solvents (See Condition 4.2)+ VOC from gelcoats and resins (See Condition 4.3)

4.2 VOCs from Coatings and Solvents For coatings and solvents, the permittee shall estimate VOC/HAP emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = \sum (RM \times D \times VOC/HAP \times EF \times K) / 2000 \text{ lbs}$$

where,

E = VOC and HAP pollutant emissions (ton/yr);

\sum = Symbol representing “summation of”;

RM = Raw Material usage in gallons per month and gallons per year;

D = Density of each Raw Material used in pounds per gallon as obtained from the MSDS/CPDS;

VOC/HAP = VOC and HAP content of Raw Material by weight fraction as obtained from the MSDS/CPDS;

EF = Emission Factor: For all solvent and coating usage, the EF is 1 (assumes 100% emitted); and

K = Conversion Factor Constant: 1 ton per 2000 pounds

4.3 VOCs from Gelcoats and Resins For gelcoats and resins containing styrene and methyl methacrylate, the permittee shall estimate VOC/HAP emissions in accordance with Appendix A – Emission Factors. These emissions depend on the application method, the material used (e.g., resin or gel coat), and the styrene or methyl methacrylate content of the applied material. Emission rates from these activities must be calculated using the “Unified Emission Factors for Open Molding of Composites” included as Appendix A (Condition 10) to this permit

5.0 RECORDKEEPING REQUIREMENTS

5.1 Recordkeeping A record of the following data shall be maintained for a period of five (5) years at the plant site and shall be available for inspection by authorized representatives of LRAPA: [LRAPA 35-0160 and 42-0080]

Monthly usage of all VOC containing materials:

These records shall include gallons of material used, density of material (pounds/gallon), VOC content (% by weight), and type of VOC material used per MSDS/CPDS referencing.

Facility-Wide Activity	Parameter	Units	Minimum Recording Frequency
VOC containing Material Usage ¹	Material Usage	gallons	Monthly
VOC containing Material Usage ¹	Density of Material, per coatings and solvents	pounds/gallon	Maintain current information at all times ²
VOC containing Material Usage ¹	VOC content	% by weight	Maintain current information at all times ²
Spray Booth maintenance performed	Occurrence	NA	Occurrence
Fuel combustion (e.g., ovens and/or any other stationary fuel burning equipment)	Fuel Combustion	Cubic feet, MMBtu, gallons	Monthly

¹NOTE: Including but not limited to: gel coats, resins and solvents.

²NOTE: This information shall be supplied from MSDS/CPDS provided by the manufacturer/supplier of the gel coats, resins and solvents.

5.2 Complaint Log The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

6.0 REPORTING REQUIREMENTS

- 6.1 Excess Emissions** The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health.
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 6.3.
 - b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - c. The permittee must also submit follow-up reports when required by LRAPA.
- 6.2 Annual Report** The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year:
- a. Annual emissions as calculated according to Condition 4.1.
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by permittee during the year.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - e. List major maintenance performed on pollution control equipment.
- 6.3 Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using an LRAPA “Permit Application Form” within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporation Division of the State of Oregon; or
 - b. Sale of exchange of the activity or facility.
- 6.4 Construction or Modification Notices** The permittee must notify LRAPA in writing using an LRAPA “Notice of Construction Form,” or “Permit Application Form,” and obtain approval in accordance with LRAPA 34-0205 through 34-0250 before:

- a. Constructing or installing any new source of air contaminant emissions, including air pollution control equipment;
- b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;

6.5 Where to Send Reports and Notices

Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office: [LRAPA 35-0160]

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

7.0 FEES

7.1 Annual Compliance Fee

The Annual Compliance Determination Fee specified in LRAPA 37-0090, Table 2, Part 2.c for a Class One General ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

The non-technical permit modification fee specified in LRAPA 37-0090, Table 2, Part 3.a is due with an application for changing the ownership or the name of the company of a source assigned to this permit.

8.0 GENERAL CONDITIONS AND DISCLAIMERS

- 8.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 8.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 8.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement.
- 8.4 LRAPA Access** The permittee must allow LRAPA’s representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 8.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 8.6 Open Burning** The permittee may not conduct any open burning except as allowed by LRAPA Title 47, “Open Burning”.
- 8.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.
- 8.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 8.9 Termination, Revocation, or Modification** LRAPA may modify or revoke this permit pursuant to LRAPA 37-0060-3 and 4.

9.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O ₂	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Revised Statutes
bbf	barrel (42 gal)	O&M	operation and maintenance
calendar year	The 12-month period beginning January 1 st and ending December 31 st	Pb	lead
CFR	Code of Federal Regulations	PCD	pollution control device
CO	carbon monoxide	PM	particulate matter
date	mm/dd/yy	PM ₁₀	Particulate matter less than 10 microns in size
DEQ	Oregon Department of Environmental Quality	PM _{2.5}	Particulate matter less than 2.5 microns in size
dscf	dry standard cubic foot	ppm	parts per million
EPA	US Environmental Protection Agency	ppmv	parts per million by volume
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
gal	gallon(s)	PSEL	Plant Site Emissions Limit
gr/dscf	grains per dry standard cubic foot	PTE	Potential to Emit
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RACT	Reasonably Available Control Technology
ID	identification number	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SERP	Source Emission Reduction Plan
MMBtu	million British thermal units	SIC	Standard Industrial Code
NA	not applicable	SIP	State Implementation Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SO ₂	sulfur dioxide
NO _x	nitrogen oxides	VE	visible emissions
NSPS	New Source Performance Standard	VOC	volatile organic compound
NSR	New Source Review	year	A period consisting of any 12-consecutive calendar months

10.0 APPENDIX A: EMISSION FACTORS

10.1

Unified Emission Factors for Open Molding of Composites

July 23, 2001

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Styrene content in resin/gelcoat, % ⁽¹⁾	<33 ⁽²⁾																				>50 ⁽²⁾
	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50			
Manual	0.126 x %styrene x 2000																				((0.286 x %styrene) - 0.0629) x 2000
Manual w/ Vapor Suppressed Resin VSR ⁽³⁾	Manual emission factor [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																				
Mechanical Atomized	0.165 x %styrene x 2000																				((0.714 x %styrene) - 0.18) x 2000
Mechanical Atomized with VSR ⁽³⁾	Mechanical Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																				
Mechanical Atomized Controlled Spray ⁽⁴⁾	0.130 x %styrene x 2000																				
Mechanical Atomized Controlled Spray with VSR	Mechanical Atomized Controlled Spray emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																				
Mechanical Non-Atomized	0.107 x %styrene x 2000																				
Mechanical Non-Atomized with VSR ⁽³⁾	Mechanical Non-Atomized emission factor [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																				
Filament application	0.164 x %styrene x 2000																				
Filament application with VSR ⁽³⁾	0.120 x %styrene x 2000																				
Gelcoat Application	0.445 x %styrene x 2000																				
Gelcoat Controlled Spray Application ⁽⁴⁾	0.325 x %styrene x 2000																				
Gelcoat Non-Atomized Application ⁽⁶⁾	SEE Note 8 below																				
Covered-Cure after Roll-Out	Non-VSR process emission factor [listed above] x (0.80 for Manual <-> 0.85 for Mechanical)																				
Covered-Cure without Roll-Out	Non-VSR process emission factor [listed above] x (0.50 for Manual <-> 0.55 for Mechanical)																				

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % ⁽⁶⁾	1																				15
	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19			
Gel coat application ⁽⁷⁾	30																				285
																					0.75 x MMA x 2000

Notes

- 1 Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass, etc.
- 2 factor equations; these are not based on test data; but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
- 3 The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the CFA Vapor Suppressant Effectiveness Test.
- 4 See the CFA Controlled Spray Handbook for a detailed description of the controlled spray procedures.
- 5 The effect of vapor suppressants on emissions from filament winding operations is based on the Dow Filament Winding Emissions Study.
- 6 Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder, but before addition of other additives such as powders, fillers, glass, etc.
- 7 Based on gelcoat data from MMA Emission Study.
- 8 SEE the July 17, 2001 EECs report Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites for a detailed description of the non-atomized gelcoat testing.
- 9 Use the equation ((0.4606 x %styrene) - 0.0606) x 2000 for gelcoats with styrene contents between 19% and 32% by wt; use the equation 0.165 x %styrene x 2000 for gelcoats with less than 19% styrene content by wt.

Max/Beth/Robbye: 04/30/15
 AQGP-003, Fiberglass

Lane Regional Air Protection Agency

**GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT**

**FIBERGLASS LAY-UP AND/OR REINFORCED PLASTIC
COMPOSITES PRODUCTION**

All True Designs, LLC – 200052
4660 Main Street, Bldg C, Ste 450
Springfield, Oregon 97478
<http://www.alltruedesigns.com/>

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from sources with activities involving fiberglass lay-up and/or reinforced plastics composite production. The category and permit is intended to regulate emissions from minor sources of Hazardous Air Pollutants (HAPs) – particularly styrene. Emissions of Volatile Organic Compounds (VOCs) are also regulated by the permit.
2. This General Permit does not apply to:
 - Process units that are subject to the requirements of any major source NESHAP
 - Any facility with actual or expected annual emissions that equal or exceed 5 tons/year of any single HAP (i.e., >50% of the major source single HAP threshold).
3. Facilities eligible for assignment to this permit have not experienced recurring or serious compliance problems.
4. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a Simple or Standard Permit.
5. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

ASSESSMENT OF EMISSIONS

6. Facilities assigned to this General Permit are sources of particulate matter (PM), VOCs and HAP emissions. For the purposes of compliance with the Plant Site Emission Limits (PSELs) facilities are required to estimate VOC and HAP emissions. PM emissions are expected to be minimal and are not required to be estimated to determine compliance with the PSEL for PM.
7. The facility will no longer qualify for this General ACDP if actual or expected annual emissions equal or exceed 5 tons/year of any single HAP (i.e., >50% of the major source single HAP threshold). Facilities with actual emission of any single HAP greater than or equal to 5 tons/year are determined to be sources with a Potential to Emit (PTE) greater than the 10 ton/year major source threshold for single HAPs. Facilities may request to be assigned to this General ACDP if actual emissions for the previous three (3) calendar years are less than 5 tons/year of any single HAP.
8. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the established levels of concern stated in Tables 2 and 3 of LRAPA Title 12.
9. Actual emissions from this facility for the most recent calendar year (2014) are estimated to be approximately 0.22 tons per year of VOC as styrene (433 lb/yr):

Material Type	Pollutant	Annual Throughput (lb/yr)	% Pollutant in Resin	Emission Factor*	2014 Emission (lb/yr)
Resin "A"	VOC/Styrene	900	32.3%	0.0346 lb/lb	31
Resin "B"	VOC/Styrene	12,000	31.3%	0.0335 lb/lb	402
Total					433

*Emission factors for resin/gel coats are from the "Technical Discussion of the Unified Emission Factors for Open Molding of Composites" for "mechanical non-atomized" and a styrene content of less than 33%.

SPECIFIC AIR PROGRAM APPLICABILITY

10. Facilities assigned to this General Permit are subject to the general visible emissions standards, nuisance requirements (control of fugitive dust and odors) in LRAPA Title 32 and 48. The permit contains requirements and limitations to ensure compliance with these standards.
11. Facilities assigned to this General Permit are not subject to 40 CFR part 63 for any HAP other than asbestos.

COMPLIANCE ASSURANCE

12. Facilities assigned to this General ACDP are required to maintain records of notifications, production, compliance, work practice activities, and complaints received at the facility for a period of five (5) years. These items are reported to LRAPA annually, as applicable.
13. LRAPA staff members perform site inspections of the permitted facilities on a routine basis, and more frequently if complaints are received.

REVOCAION OF ASSIGNMENT

14. Any facility that fails to demonstrate compliance, generates complaints, or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a higher, more stringent level of permitting.

PUBLIC NOTICE

15. General Air Contaminant Discharge Permits are incorporated into LRAPA Rules and Regulations by reference and are part of the State Implementation Plan. As part of the rulemaking process, the public will be provided at least 30 days to submit written comments or may provide oral testimony at a public hearing that will be held at the end of the comment period in different locations throughout the state. Notice of when and where the hearings will be held will be provided at least 30 days in advance of the hearings. LRAPA will review any comments and may modify the permits in response to the comments. The final permits will be issued after approval by the LRAPA Director.

AQGP-003r, fiberglass lay-up and reinforced plastic composites production
No DEQ equivalent
Max/Beth 2/2/2016