

BASIC
AIR CONTAMINANT DISCHARGE PERMIT

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

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Custom Craftworks
1050 Owen Loop South
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application No.: 63923
Date Received: March 23, 2018
Application No.: 63990
Date Received: May 2, 2018

PLANT SITE LOCATION:


800 48th Street
Springfield, OR 97478

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Springfield
Approval Date: April 26, 2018

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY


Merlyn L. Hough, Director


Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 7	Surface coating operations whose actual or expected usage of coating materials is greater than 250 gallons/year, but less than 250 gallons/month, excluding sources that exclusively use non-VOC and non-HAP containing coatings (e.g., powder coating operations).	4212

1.0 PERMIT ISSUANCE

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for this permit:
- a. The permittee is performing surface coating as described on the cover page of this permit, including supporting activities.
 - b. A General, Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Permitted Activities** The permittee is allowed 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air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit. 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 an associated General ACDP Attachment or a Simple or Standard ACDP, if applicable.

2.0 EMISSION STANDARDS AND LIMITS

- 2.1 Production Limits** The permittee is prohibited from using more than 250 gallons/month and/or 3,000 gallons/year of any VOC-containing product without first notifying LRAPA.
- 2.2 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 or periods aggregating more than three minutes in any one hour.
- 2.3 Particulate Matter Emissions** Particulate matter emissions from any air contaminant source, other than fugitive emission sources, must not exceed 0.10 grains per dry standard cubic foot.
- 2.4 Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive particulate matter from becoming airborne from all site operations from which it may be generated. Such

reasonable precautions may include, but are not limited to:

- a. Controlling vehicle speeds on unpaved roadways;
- b. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
- c. Full or partial enclosure of material stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;
- d. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
- e. The prompt removal from paved streets of earth or other material (track-out) that may become airborne.

2.5 Particulate Matter Fallout The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person.

2.6 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 RECORDKEEPING AND REPORTING REQUIREMENTS

3.1 Annual Report The permittee must report the following information to LRAPA by **February 15th** of each year:

- a. Number of gallons of VOC-containing coatings used during the previous calendar year; and
- b. Written log of all air quality or nuisance complaints and how each complaint was handled.

3.2 Excess Emissions The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. Excess emissions are evident when visible emissions are greater than 20% opacity for a period or periods aggregating more than three minutes in any one hour.

- 3.3 Retention of Records** Records of the information required by Conditions 3.1 and 3.2 must be maintained on site for a period of five (5) years from the date of the record and must be made available to LRAPA upon request.
- 3.4 Construction or Modification Notices** The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to, or emissions are significantly changed or increased.
- 3.5 Notice of Change of Ownership or Company Name** The permittee must notify LRAPA using a LRAPA "Transfer Application - AQ103" form within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 3.6 Where to Send Reports and Notices** The reports and notices, with the permit number prominently displayed, must be sent to:
- Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

4.0 ADMINISTRATIVE REQUIREMENTS

- 4.1 Renewal of the Basic Permit** A complete application for renewal of this permit is due within 30 days prior to expiration.
- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is renewed.
 - b. The permittee may submit an application for either a General, Simple, or Standard ACDP at any time, but the permittee must continue to comply with the Basic ACDP until LRAPA takes final action on the General, Simple, or Standard ACDP application.
 - c. If a complete application for renewal of the Basic ACDP or General, Simple, or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

4.2 Where to Send Applications Applications must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

5.0 FEES

5.1 Annual Compliance Fee The Annual Fee specified in LRAPA Title 37, Table 2, Section 37-8020, Part 2.b. for a Basic 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.

5.2 Change of Ownership or Company Name Fee The non-technical permit modification fee specified in LRAPA Title 37, Table 2, Section 37-8020, 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.

5.3 Where to Submit Fees Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

6.0 GENERAL CONDITIONS

6.1 Other Regulations In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

6.2 Conflicting Conditions In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

6.3 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.

6.4 LRAPA Access The permittee must allow LRAPA 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.

- 6.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 6.6 Open Burning** The permittee may not conduct any open burning, except as may be allowed by LRAPA Title 47.
- 6.7 Asbestos** All activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance must be performed by persons certified for asbestos abatement projects and comply with the requirements of LRAPA Title 43. Accumulation of asbestos containing material is prohibited. Contact the LRAPA office with any questions relating to asbestos.
- 6.8 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.
- 6.9 Termination, Revocation, or Modification** LRAPA may terminate, revoke, or modify this permit pursuant to LRAPA Title 37, Section 37-0060(3) and (4).

7.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
calendar year	The 12-month period beginning January 1st and ending December 31st	ORS	Oregon Revised Statutes
CFR	Code of Federal Regulations	O&M	operation and maintenance
CO	carbon monoxide	Pb	lead
DEQ	Oregon Department of Environmental Quality	PCD	pollution control device
dscf	dry standard cubic foot	PM	particulate matter
EPA	US Environmental Protection Agency	PM ₁₀	particulate matter less than 10 microns in size
FCAA	Federal Clean Air Act	ppm	part per million
gal	gallon(s)	PSD	Prevention of Significant Deterioration
gr/dscf	grains per dry standard cubic foot	PSEL	Plant Site Emission Limit
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	PTE	Potential to Emit
ID	identification number	RACT	Reasonably Available Control Technology
I&M	inspection and maintenance	scf	standard cubic foot
lb	pound(s)	SER	Significant Emission Rate
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	Special Control Area	as defined in LRAPA Title 29
NSPS	New Source Performance Standard	VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

Lane Regional Air Protection Agency

**BASIC
AIR CONTAMINANT DISCHARGE PERMIT
REVIEW REPORT**

Custom Craftworks
800 48th Street
Springfield, OR 97478
541-345-2712

Reports			NSPS	Size	Public Notice
Annual	Semi-annual	Excess Emissions			
Feb 15	NA	NA	NA	B	1

1. The proposed permit is a new permit for an existing facility that will be moving from its current location in Eugene, Oregon, to a new facility in Springfield, Oregon, and whose projected VOC-containing coating usage at the new location qualifies the source for a permit under LRAPA Title 37.
2. The facility manufactures high-end, customized massage tables. There are two paint booths with filters at the facility. The facility does woodworking that primarily utilizes 4' by 8' sheets of plywood and laminate at a rate of 40 sheets per day and pre-milled hardwood at a rate of 15 linear feet per day; all of which is controlled by a dust collector. The company began producing massage tables in 1986.
3. This facility qualifies for a Basic ACDP because the surface coating operations will use less than 250 gallons per month, but more than 250 gallons a year, of VOC-containing coatings.
4. The facility is located in an attainment area for PM, PM_{2.5}, VOC, NO_x, SO₂ and a maintenance area for CO and PM₁₀.
5. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases, the emissions will not exceed 5 tons of PM or PM₁₀ or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
6. Pursuant to LRAPA 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

KE:RCL
5/7/2018

Volatile Organic Compound (VOC) Annual Emissions Estimates

Paint Type	Projected Annual Usage (gallons) ¹	Product Density (lb/gal)	VOC Content (lb/gal) ²	Annual Emissions (tons/yr)
Sher-Wood® Kem Aqua Lacquer	480	8.48	0.91	0.22
Total	480			0.22

¹NOTE: Projected annual usage values provided by the facility in the Basic Air Contaminant Discharge Permit Application No. 63923 received by LRAPA on March 23, 2018.

²NOTE: VOC content obtained from the Safety Data Sheet provided by the facility.