ASSIGNMENT

to

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

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

PERMITTEE:

Metal Detectors, Inc.
P.O. Box 26440
Eugene, OR 97402

INFORMATION RELIED UPON:

Application No.: 60481
Date Received: 05/22/15

PLANT SITE LOCATION:

1001 Terry Street
Eugene, OR 97402

LAND USE COMPATIBILITY STATEMENT:

Approving Authority: City of Eugene
Approval Date: 01/03/11

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.

MAY 26 2015
Merlyn L. Hough, Director

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

<table>
<thead>
<tr>
<th>General ACDP Number</th>
<th>Expiration Date</th>
<th>Source Category Description</th>
<th>SIC</th>
</tr>
</thead>
<tbody>
<tr>
<td>AQGP-003</td>
<td>04/30/2025</td>
<td>Fiberglass lay-up and/or reinforced plastics composites production, including but not limited to SIC codes 3083, 3089, 3562, 3823</td>
<td>3669</td>
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</table>
SUPPLEMENTAL INFORMATION:

<table>
<thead>
<tr>
<th>Facility contact:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Name:</td>
</tr>
<tr>
<td>Phone number:</td>
</tr>
<tr>
<td>Facsimile number:</td>
</tr>
<tr>
<td>e-mail address:</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Permit Summary:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Source Test Requirement</td>
</tr>
<tr>
<td>NSPS (40 CFR Part 60)</td>
</tr>
<tr>
<td>NESHAP (40 CFR Part 63)</td>
</tr>
<tr>
<td>Reports Required:</td>
</tr>
<tr>
<td>Annual</td>
</tr>
<tr>
<td>NSPS</td>
</tr>
<tr>
<td>NESHAP</td>
</tr>
<tr>
<td>Other</td>
</tr>
<tr>
<td>Public Notice</td>
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</tbody>
</table>

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

This permit is issued in accordance with the provisions of LRAPA Title 37, Section 37-0069 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:
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)

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Limit</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>24</td>
<td>tons per year</td>
</tr>
<tr>
<td>PM$_{10}$</td>
<td>14</td>
<td>tons per year</td>
</tr>
<tr>
<td>PM$_{2.5}$</td>
<td>9</td>
<td>tons per year</td>
</tr>
<tr>
<td>VOC</td>
<td>39</td>
<td>tons per year</td>
</tr>
</tbody>
</table>
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:

\[ E = \text{VOC from coatings and solvents (See Condition 4.2)} + \text{VOC from gelcoats and resins (See Condition 4.3)} \]

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:

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

where,

- \( E \) = VOC and HAP pollutant emissions (ton/yr);
- \( \sum \) = Symbol representing “summation of”;
- \( \text{RM} \) = Raw Material usage in gallons per month and gallons per year;
- \( \text{D} \) = Density of each Raw Material used in pounds per gallon as obtained from the MSDS/CPDS;
- \( \text{VOC/HAP} \) = VOC and HAP content of Raw Material by weight fraction as obtained from the MSDS/CPDS;
- \( \text{EF} \) = Emission Factor: For all solvent and coating usage, the EF is 1 (assumes 100% emitted); and
- \( \text{K} \) = Conversion Factor Constant: 1 ton per 2000 pounds

4.3 VOCs from Geocoats 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.

<table>
<thead>
<tr>
<th>Facility-Wide Activity</th>
<th>Parameter</th>
<th>Units</th>
<th>Minimum Recording Frequency</th>
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</thead>
<tbody>
<tr>
<td>VOC containing Material Usage(^1)</td>
<td>Material Usage</td>
<td>gallons</td>
<td>Monthly</td>
</tr>
<tr>
<td>VOC containing Material Usage(^1)</td>
<td>Density of Material, per coatings and solvents</td>
<td>pounds/gallon</td>
<td>Maintain current information at all times(^2)</td>
</tr>
<tr>
<td>VOC containing Material Usage(^1)</td>
<td>VOC content</td>
<td>% by weight</td>
<td>Maintain current information at all times(^3)</td>
</tr>
<tr>
<td>Spray Booth maintenance performed</td>
<td>Occurrence</td>
<td>NA</td>
<td>Occurrence</td>
</tr>
<tr>
<td>Fuel combustion (e.g., ovens and/or any other stationary fuel burning equipment)</td>
<td>Fuel Combustion</td>
<td>Cubic feet, MMBtu, gallons</td>
<td>Monthly</td>
</tr>
</tbody>
</table>

\(^1\)NOTE: Including but not limited to: gel coats, resins and solvents.

\(^2\)NOTE: 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.
### 9.9 Abbreviations, Acronyms, and Definitions

<table>
<thead>
<tr>
<th>Acronym</th>
<th>Description</th>
<th>Symbol</th>
<th>Definition</th>
</tr>
</thead>
<tbody>
<tr>
<td>ACDP</td>
<td>Air Contaminant Discharge Permit</td>
<td>O₂</td>
<td>oxygen</td>
</tr>
<tr>
<td>ASTM</td>
<td>American Society for Testing and Materials</td>
<td>OAR</td>
<td>Oregon Revised Statutes</td>
</tr>
<tr>
<td>bbl</td>
<td>barrel (42 gal)</td>
<td>O&amp;M</td>
<td>operation and maintenance</td>
</tr>
<tr>
<td>calendar year</td>
<td>The 12-month period beginning January 1st and ending December 31st</td>
<td>Pb</td>
<td>lead</td>
</tr>
<tr>
<td>CFR</td>
<td>Code of Federal Regulations</td>
<td>PCD</td>
<td>pollution control device</td>
</tr>
<tr>
<td>CO</td>
<td>carbon monoxide</td>
<td>PM</td>
<td>particulate matter</td>
</tr>
<tr>
<td>date</td>
<td>mm/dd/yy</td>
<td>PM₁₀</td>
<td>Particulate matter less than 10 microns in size</td>
</tr>
<tr>
<td>DEQ</td>
<td>Oregon Department of Environmental Quality</td>
<td>PM₂₅</td>
<td>Particulate matter less than 2.5 microns in size</td>
</tr>
<tr>
<td>dscf</td>
<td>dry standard cubic foot</td>
<td>ppm</td>
<td>parts per million</td>
</tr>
<tr>
<td>EPA</td>
<td>US Environmental Protection Agency</td>
<td>ppmv</td>
<td>parts per million by volume</td>
</tr>
<tr>
<td>FCAA</td>
<td>Federal Clean Air Act</td>
<td>PSD</td>
<td>Prevention of Significant Deterioration</td>
</tr>
<tr>
<td>gal</td>
<td>gallon(s)</td>
<td>PSEL</td>
<td>Plant Site Emissions Limit</td>
</tr>
<tr>
<td>gr/dscf</td>
<td>grains per dry standard cubic foot</td>
<td>PTE</td>
<td>Potential to Emit</td>
</tr>
<tr>
<td>HAP</td>
<td>Hazardous Air Pollutant as defined by LRAPA Title 44</td>
<td>RACT</td>
<td>Reasonably Available Control Technology</td>
</tr>
<tr>
<td>ID</td>
<td>identification number</td>
<td>scf</td>
<td>standard cubic foot</td>
</tr>
<tr>
<td>I&amp;M</td>
<td>inspection and maintenance</td>
<td>SER</td>
<td>Significant Emission Rate</td>
</tr>
<tr>
<td>lb</td>
<td>pound(s)</td>
<td>SERP</td>
<td>Source Emission Reduction Plan</td>
</tr>
<tr>
<td>MMBtu</td>
<td>million British thermal units</td>
<td>SIC</td>
<td>Standard Industrial Code</td>
</tr>
<tr>
<td>NA</td>
<td>not applicable</td>
<td>SIP</td>
<td>State Implementation Plan</td>
</tr>
<tr>
<td>NESHAP</td>
<td>National Emissions Standards for Hazardous Air Pollutants</td>
<td>SO₂</td>
<td>sulfur dioxide</td>
</tr>
<tr>
<td>NOₓ</td>
<td>nitrogen oxides</td>
<td>VE</td>
<td>visible emissions</td>
</tr>
<tr>
<td>NSPS</td>
<td>New Source Performance Standard</td>
<td>VOC</td>
<td>volatile organic compound</td>
</tr>
<tr>
<td>NSR</td>
<td>New Source Review</td>
<td>year</td>
<td>A period consisting of any 12-consecutive calendar months</td>
</tr>
</tbody>
</table>
10.0 APPENDIX A: EMISSION FACTORS

10.1
### Unified Emission Factors for Open Molding of Composites

**July 23, 2003**

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

| Styrene content in resin/gelcoat, % (1) | <33 (2) | 33 | 34 | 35 | 36 | 37 | 38 | 39 | 40 | 41 | 42 | 43 | 44 | 45 | 46 | 47 | 48 | 49 | 50 | >50 (2) |
|----------------------------------------|--------|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|----|-------|
| Manual                                 | 0.126 \times \text{Styrene} x \text{2000} | 83 | 89 | 94 | 100 | 108 | 112 | 117 | 123 | 129 | 134 | 140 | 146 | 152 | 157 | 163 | 169 | 174 | 180 | (0.288 \times \text{Styrene} - 0.0529) x \text{2000} |
| Manual w/ Vapor Suppressed Resin VSR (2) | Manual emission factor listed above \times (1 - 0.50 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Mechanical Automated                   | 0.169 \times \text{Styrene} x \text{2000} | 111 | 120 | 140 | 154 | 168 | 183 | 197 | 211 | 225 | 240 | 254 | 268 | 283 | 297 | 311 | 325 | 340 | 354 | (0.714 \times \text{Styrene} - 0.18) x \text{2000} |
| Mechanical Automated w/ VSR (2)        | Mechanical Automated emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Mechanical Automated Controlled Spray (2) | Mechanical Automated Controlled Spray emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Mechanical Controlled Spray with VSR   | Mechanical Controlled Spray with VSR emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Mechanical Non-Atomized                | 0.107 \times \text{Styrene} x \text{2000} | 71 | 74 | 77 | 80 | 83 | 86 | 89 | 93 | 96 | 99 | 102 | 105 | 108 | 111 | 114 | 118 | 121 | 124 | (0.157 \times \text{Styrene} - 0.0685) x \text{2000} |
| Mechanical Non-Atomized w/ VSR (2)     | Mechanical Non-Atomized emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Filament Application                   | 0.194 \times \text{Styrene} x \text{2000} | 122 | 127 | 133 | 138 | 144 | 149 | 155 | 160 | 166 | 171 | 177 | 182 | 188 | 193 | 199 | 204 | 210 | 215 | (0.2746 \times \text{Styrene} - 0.0099) x \text{2000} |
| Filament application with VSR (2)       | Filament application emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Gelcoat Application                    | 0.120 \times \text{Styrene} x \text{2000} | 79 | 83 | 88 | 93 | 97 | 100 | 104 | 108 | 111 | 115 | 118 | 122 | 125 | 129 | 133 | 136 | 140 | 144 | 0.85 \times (0.2746 \times \text{Styrene} - 0.0099) x \text{2000} |
| Gelcoat Application w/ VSR (2)         | Gelcoat Application emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Gelcoat Non-Atomized Application (2)   | Gelcoat Non-Atomized Application emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |
| Covered-Cure after Roll-Out            | SEE Note 9 below | 106 | 205 | 214 | 223 | 232 | 241 | 250 | 256 | 266 | 276 | 287 | 296 | 305 | 314 | 323 | 332 | 341 | 350 | (0.4506 \times \text{Styrene} - 0.0665) x \text{2000} |
| Non-VSR process emission factor        | | | | | | | | | | | | | | | | | | | | |
| Covered-Cure without Roll-Out          | Non-VSR process emission factor listed above \times (1 - 0.45 x \text{specific VSR reduction factor for each resin/gelcoat formulation}) | | | | | | | | | | | | | | | | | | | | |

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

| MMA content in gelcoat, % (2) | 1 | 2 | 3 | 4 | 5 | 6 | 7 | 8 | 9 | 10 | 11 | 12 | 13 | 14 | 15 | 16 | 17 | 18 | 19 | >20 |
|-------------------------------|---|---|---|---|---|---|---|---|---|----|----|----|----|----|----|----|----|----|----|----|----|
| Gel coat application (2)       | 10 | 30 | 45 | 60 | 75 | 90 | 105 | 120 | 135 | 150 | 165 | 180 | 195 | 210 | 225 | 240 | 255 | 270 | 285 | 0.75 \times \text{MMA} x \text{2000} |

**Notes**

1. Including styrene monomer content as supplied, plus any add styrene monomer added by the molder, but before addition of other additives such as powders, fillers, glass, etc.
2. See the Colt application handbook for a detailed description of the controlled spray procedures.
3. The VSR reduction factor is determined by testing each resin/gelcoat formulation according to the procedures detailed in the CPA Vapor Suppression Effectiveness Test.
4. The VSR reduction factor is determined by testing each resin/gelcoat formulation according to the procedures detailed in the CPA Vapor Suppressive Effectiveness Test.
5. The VSR reduction factor is determined by testing each resin/gelcoat formulation according to the procedures detailed in the CPA Vapor Suppressive Effectiveness Test.
6. The VSR reduction factor is determined by testing each resin/gelcoat formulation according to the procedures detailed in the CPA Vapor Suppressive Effectiveness Test.
7. Based on gelcoat data from MMA Emission Study.
9. Use the equation (0.4506 \times \text{Styrene} - 0.0665) x \text{2000} for gelcoats with styrene contents between 19% and 32% by wt., use the equation 0.185 \times \text{Styrene} x \text{2000} for gelcoats with less than 19% styrene content by wt.

Max/Beth/Robby: 04/30/15
AQGP-003, Fiberglass
GENERAL
AIR CONTAMINANT DISCHARGE PERMIT
ASSESSMENT REPORT

FIBERGLASS LAY-UP AND/OR REINFORCED PLASTIC COMPOSITES PRODUCTION

Metal Detectors, Inc. (205190)
1001 Terry Street
Eugene, OR
http://www.metaldetectorsinc.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 are estimated to be:
   - Calendar year 2014: VOC/Styrene emissions = 1.2 tons/year
   - Calendar year 2013: VOC/Styrene emissions =1.3 tons/year

**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.

REVOCATION 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 05/22/15