

LANE REGIONAL AIR PROTECTION AGENCY

1010 Main Street, Springfield, Oregon 97477

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Web Page: www.lrapa.org

STANDARD AIR CONTAMINANT DISCHARGE PERMIT

Issued in accordance with provisions of Title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:

Arclin U.S.A. Inc.

475 North 28th Street

Springfield, Oregon 97477

Land Use Compatibility Statement:

From: City of Springfield

Date: June 20, 2000

Mailing Address:

P.O. Box 270

Springfield, Oregon 97477

Fee Basis:

Title 37, Table 1:

Part B: 51 and 70 – Organic and Synthetic Resin Mfg

Part C: 3, 5 and 6 – Maintain Baseline, Potential to Emit more than 100 tons/year of any regulated air contaminant and more than 10 tons/year of a single hazardous air pollutant.

Permit Number: 201221

Permit Type: Standard

SIC: 2821 Synthetic Resin Manufacturing
2869 Organic Chemical Manufacturing
4961 Combustion Source

Date Renewed: July 19, 2010

Expiration Date: July 19, 2015

Modified:

- Name change of permittee
October 20, 2010

Permitted Sources:

Resin and Formaldehyde Manufacturing Operation including the units listed in Condition 2 and:

SF-1 Formaldehyde Plant w/Regenerative Thermal Oxidizer,

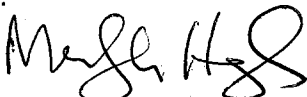
SF-2 Formaldehyde Plant and Tail Gas Boiler, and

SF-3 Formaldehyde Plant and Catalytic Incinerator

Natural Gas Boiler (Subject to NSPS Subpart Dc)

Miscellaneous VOC Sources including Storage Tanks (ST-1) and Fugitives

Issued by:



Merlyn L. Hough, Director

Effective Date:

NOV 8 2010

ADDENDUM NO. 6
Administrative Amendment

Arclin U.S.A. LLC
Permit No. 201221
Expiration Date: July 19, 2015

Page 2 of 2

In accordance with Section 37-0066-4.B.1 Air Contaminant Discharge Permit No. 201221 is hereby amended to establish a name change in accordance with Section 42-0045 of LRAPA's Rules and Regulations.

The section "Issued To" on page 1 of Permit 201221 now reads as follows:

Issued To:
Arclin U.S.A. LLC
475 North 28th Street
Springfield, Oregon 97477

Max/cmw
11/3/10

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STANDARD AIR CONTAMINANT DISCHARGE PERMIT

Issued in accordance with provisions of Title 34, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:

Arclin U.S.A. Inc.
475 North 28th Street
Springfield, Oregon 97477

Land Use Compatibility Statement:

From: City of Springfield
Date: June 20, 2000

Mailing Address:

P.O. Box 270
Springfield, Oregon 97477

Fee Basis:

Title 37, Table 1:
Part B: 51 and 70
Part C: 3, 5 and 6

Permit Number: 201221

Permit Type: Standard

SIC: 2821 Synthetic Resin Manufacturing
2869 Organic Chemical Manufacturing
4961 Combustion Source

Date Renewed: June 25, 2005

Expiration Date: June 24, 2010

Modified:

- Correction of typographic error, June 28, 2007
- Name change of permittee, November 5, 2007
- Correction of CO PSEL, NSPS language, emission factors December 18, 2007
- Permit type change and Unassigned Emissions Expiration

Permitted Sources:

Resin and Formaldehyde Manufacturing Operation including the units listed in Condition 2 and:
SF-1 Formaldehyde Plant w/Regenerative Thermal Oxidizer,
SF-2 Formaldehyde Plant and Tail Gas Boiler, and
SF-3 Formaldehyde Plant and Catalytic Incinerator
Natural Gas Boiler (Subject to NSPS Subpart Dc)
Miscellaneous VOC Sources including Storage Tanks (ST-1) and Fugitives

Issued by:



Merlyn L. Hough, Director

Effective Date:

May 8, 2009

ADDENDUM NO. 4
Administrative Amendment

In accordance with Section 37-0084 Air Contaminant Discharge Permit No. 201221 is hereby amended to establish an expiration date for unassigned emissions in accordance with Section 42-0045 of LRAPA's Rules and Regulations. The permit is also changed from a "Synthetic Minor" ACDP to a "Standard" ACDP in accordance with Title 37. Condition 3 now reads as follows:

3. The total emissions from plant site operation shall not exceed the annual (12-month rolling) limits below.

Annual (12-Month Rolling) PSEL
(tons)

	PM/PM ₁₀	SO ₂	NO _x	CO	VOC
PSEL	1	<0.5	19	99	50
Unassigned Emissions	NA	NA	NA	1,160	NA

- 3.a The unassigned emissions in Condition 3 are available for *internal* use by the permittee for increases of emissions, consistent with LRAPA Rules and Regulations, upon receipt of written approval by the Director. In accordance with LRAPA Section 42-005, ***the Unassigned Emissions shall expire and are reduced to no more than the SER on July 1, 2010.***

Max/cmw
5/4/09

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SYNTHETIC MINOR AIR CONTAMINANT DISCHARGE PERMIT
(SM-ACDP)

Issued in accordance with provisions of Title 34, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:

Dynea USA Inc.

475 North 28th Street

Springfield, Oregon 97477

Land Use Compatibility Statement:

From: City of Springfield

Date: June 20, 2000

Mailing Address:

P.O. Box 270

Springfield, Oregon 97477

Fee Basis:

Table A, Part II:

28a Synthetic Resin Manufacturing

27a Organic Chemicals Manufacturing

58c Gas Fired Boiler

Permit Number: 201221

Permit Type: Synthetic Minor

SIC: 2821 Synthetic Resin Manufacturing

2869 Organic Chemical Manufacturing

4961 Combustion Source

Date Renewed: June 25, 2005

Expiration Date: June 24, 2010

Permitted Sources:

Resin and Formaldehyde Manufacturing Operation including the units listed in Condition 2 and:

SF-1 Formaldehyde Plant w/Regenerative Thermal Oxidizer,

SF-2 Formaldehyde Plant and Tail Gas Boiler, and

SF-3 Formaldehyde Plant and Catalytic Incinerator

Natural Gas Boiler (Subject to NSPS Subpart Dc)

Miscellaneous VOC Sources including Storage Tanks (ST-1) and Fugitives

Issued

by: _____
Merlyn L. Hough, Director

Effective

Date: _____

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

CI	Catalytic Incinerator
CFR	Code of Federal Regulations
CO	Carbon Monoxide
DEQ	Oregon Department of Environmental Quality
DME	Dimethyl Ether (Dimethyl ether is a VOC not a HAP)
HAPs	Hazardous Air Pollutants
HCHO	Formaldehyde
MeOH	Methanol
MF	Melamine Formaldehyde Resin
MUF	Melamine Urea Formaldehyde Resin
NESHAP	National Emission Standard for Hazardous Air Pollutants
NH3	Aqua Ammonia (Ammonium Hydroxide)
NOx	Nitrogen Oxides
NSPS	New Source Performance Standard
OAR	Oregon Administrative Rules
PF	Phenol Formaldehyde Resin
ppm	parts per million
PRF	Phenol Resorcinol Formaldehyde Resin
RF	Resorcinol Formaldehyde Resin
RTO	Regenerative Thermal Oxidizer
RTU	Ready-to-Use (hardeners and adhesives)
SF-1	Springfield Formaldehyde Plant-1
SF-2	Springfield Formaldehyde Plant-2
SF-3	Springfield Formaldehyde Plant-3
TGB	Tail Gas Boiler
TOC	Total organic compounds
UF	Urea Formaldehyde Resin
UFC	Urea Formaldehyde Concentrate (also known as UF-85)
VOC	Volatile Organic Compound
VOL	Any organic liquid that can emit volatile organic compounds into the atmosphere

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge air contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

Emission Unit Description

2. The emission units regulated by this permit are the following:

Emission Unit	Pollutant Emitted	Control Device
<p>Group 1: Powdered Hardener Manufacturing (Mfg) and Storage Process; Resin Mfg, Storage and Loading Process; SF-1 Formaldehyde Mfg, Storage and Distribution Process including:</p> <p>Ribbon Blender and Associated Equipment</p> <p>6 Resin Kettles and Associated Equipment vented to RTO</p> <p>3 Mixers (M-3 through M-5)</p> <p>SF-1 Formaldehyde Process</p> <p>Raw Material, Intermediate Products, Operating Chemicals and Finished Products, Unloading, Storage, and Loading Processes</p>	<p>VOC, Methanol, Phenol, Formaldehyde, CO, and NO_x</p>	<p>Regenerative Thermal Oxidizer (RTO)</p>
<p>Group 2: SF-2 Formaldehyde Manufacturing, Storage and Loading Process including:</p> <p>SF-2 Formaldehyde Process</p> <p>Tail Gas Boiler (TGB) (Zurn, 6.8 MM BTU/hr boiler, tangential-fired)</p>	<p>VOC, Methanol, Formaldehyde, CO, and NO_x</p>	<p>Tail Gas Boiler (TGB)</p>
<p>Group 3: SF-3 Formaldehyde Manufacturing, Storage and Loading Process including:</p> <p>SF-3 Formaldehyde Process</p>	<p>VOC, Methanol, Formaldehyde, CO and NO_x</p>	<p>Catalytic Incinerator (CI)</p>

Emission Unit	Pollutant Emitted	Control Device
Group 4: RTU Adhesive and Hardener Manufacturing, Storage and Loading Process including: 2 Mixers (M-1, M-2) and Associated Equipment Storage Tanks and Containers (both vented to ambient and vented to the RTO, TGB or CI) Raw Material, Intermediate Products, Operating Chemicals and Finished Products Unloading, Storage, and Loading Processes	VOC, Methanol, Phenol, Formaldehyde, and CO	N/A
ST-1: Storage Tanks and Containers not elsewhere classified	VOC, Methanol, Phenol, Formaldehyde	N/A
Boiler -1: Bryan 13.6 MMBTU/hr stand-by boiler (tangential-fired)	NO _x , CO, and VOC	N/A
FUG-1: Fugitive Emission Components (Pumps, Compressors, Valves and Flanges)	VOC, Methanol, Phenol, Formaldehyde	N/A

Performance Standards and Limitations

Plant Site Emission Limits (PSELs)

- The total emissions from plant site operation shall not exceed the annual (12-month rolling) limits below.

Annual (12-Month Rolling) PSEL
(tons)

	PM/PM ₁₀	SO ₂	NO _x	CO	VOC
Totals	1	<0.5	19	39	50

Any changes in operation that may increase the emissions above the PSEL must be approved by LRAPA. Failure to do so may result in enforcement actions being taken by LRAPA.

Synthetic Minor Limitations

4. The total emissions of hazardous air pollutants (HAPs) at this facility must not exceed the following annual (rolling 12-month) limits.

- 4.a. 9 tons per year of any single HAP; and
- 4.b. 24 tons per year of any combination of HAPs.

Any violation of any HAPs permit condition that limits the potential to emit will be a violation of LRAPA 34-170 (OAR 340-218-0020), and the permittee will need to apply for a Federal Operating Permit in accordance with LRAPA 34-120.

5. The permittee shall monitor and demonstrate compliance with the HAPs emission limits by keeping the records required by Condition 33, and calculating a new 12-month rolling total for each HAP and combination of HAPs by the 30th calendar day of each month, as specified in Condition 33. The 12-month rolling totals shall be determined by adding monthly emission estimations for the previous 12-month period.

Plant-Wide Performance Standards and Emission Limits

6. The permittee shall not cause, suffer, allow, or permit the emission of any air contaminant, excluding uncombined water, into the atmosphere from any air contaminant source for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20 percent opacity. [LRAPA 32-010(1)(B) and (3)]
7. The maximum allowable emission of particulate matter from any combustion source installed, constructed, or modified prior to June 1, 1970, shall not exceed 0.2 grains per cubic foot (gr/scf) of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon dioxide. [LRAPA 32-020]
8. The maximum allowable emission of particulate matter from any combustion source installed, constructed, or modified after June 1, 1970 shall not exceed 0.1 gr/scf of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon dioxide. [LRAPA 32-030]
9. The permittee shall not allow the emissions of particulate matter to exceed 0.2 grains per dry standard cubic foot (gr/dscf) for any air contaminant source constructed or modified prior to June 1, 1970. [LRAPA 32-015(1)]
10. The permittee shall not allow the emissions of particulate matter to exceed 0.1 gr/dscf for any air contaminant source constructed or modified after to June 1, 1970. [LRAPA 32-015(2)]

New Source Performance Standards (NSPS) Subpart III (Subpart III), Standards of Performance for VOC Emissions from the Synthetic Organic Chemical Manufacturing Industry (SOCMI) Air Oxidation Unit Process

NSPS Subpart III Applicable Requirements

11. For the Group 3 Emission Unit (SF-3) controlled by the Catalytic Incinerator in Condition 2, the permittee shall reduce emissions of Total Organic Compounds (TOC), minus methane and ethane, as follows:
 - 11.a. by 98 weight-percent or
 - 11.b. 20 ppmv, or less, on a dry basis, corrected to 3 percent oxygen as required by the SOCMI NSPS, 40 CFR 60.612(a).

12. The permittee shall monitor the temperatures and flow at the Catalytic Incinerator in Condition 11. To monitor and record the temperatures and flow, the permittee must install, calibrate, maintain, and operate, according to manufacturer's specifications, the following equipment:
 - 12.a. A temperature monitoring device equipped with a continuous recorder and having an accuracy of +/- 1% of the temperature being monitored expressed in degrees Celsius, or +/- 5 degrees Celsius, whichever is greater; [40 CFR 60.613(a)(1)]
 - 12.a.i In the catalytic incinerator, a temperature-monitoring device shall be installed in the gas stream immediately before and after the catalyst bed. [40 CFR 60.613(a)(1)(ii)]
 - 12.b. A flow indicator that provides a record of vent stream flow from Group-3 to the catalytic incinerator at least once every hour. The flow indicator shall be installed in the vent stream from the catalytic incinerator at a point closest to the inlet of each incinerator and before being joined with any other vent stream. [40 CFR 60.613(a)(2)]

NSPS Subpart III Testing

13. For the purposes of demonstrating compliance with Condition 11, the permittee shall run the catalytic incinerator at full operating conditions and flow rates during any performance test as required by as required Condition 39. [40 CFR 60.614(a)]

14. The performance test methods of 40 CFR 60.614(b), except as provided by 40 CFR 60.8, shall be used as reference methods to determine compliance with the 20 ppmv (on a dry basis and corrected to three (3) percent oxygen) emission limit or 98 weight-percent reduction efficiency specified in Condition 11. [40 CFR 60.614(b)]

NSPS Subpart III Recordkeeping

15. The permittee shall keep up-to-date, readily accessible records of the following data measured during each performance test, and also include the following data in the report of the initial performance test required under 40 CFR 60.8. The same data specified in this section shall be submitted in the reports of all subsequently required performance tests where either the emission control efficiency of a catalytic incinerator or outlet concentration of TOC of the vent stream from the catalytic incinerator is determined. [40 CFR 60.615(b)]
 - 15.a. The average upstream and downstream temperature of the catalyst bed in the catalytic incinerator measured at least every 15 minutes and averaged over the same time period of the performance testing. [40 CFR 60.615(b)(1)(i)]

- 15.b. The percent reduction of TOC determined as specified in 40 CFR 60.614(b) achieved by the catalytic incinerator, or the concentration of TOC (ppmv, by compound) determined as specified in 40 CFR 60.614(b) at the outlet of the catalytic incinerator on a dry basis corrected to 3 percent oxygen. [40 CFR 60.615(b)(1)(ii)]
16. The permittee shall keep up-to-date, readily accessible continuous records of the equipment (Group 3 (SF-3) and catalytic incinerator) operating parameters specified to be monitored in Condition 12 as well as up-to-date, readily accessible records that identify any periods of operation during which the parameter boundaries of Condition 15 established during the most recent performance test are exceeded. LRAPA may at any time require a report of these data. Periods of operation during which the parameter boundaries established during the most recent performance tests are exceeded are defined as follows: [40 CFR 60.615(c)]
- 16.a. For the catalytic incinerator, all 3-hour periods of operation during which the average temperature of the vent stream immediately before the catalyst bed is more than 28 degrees C (50 degrees F) below the average temperature of the vent stream (after the catalyst bed) during the most recent performance test at which compliance with Condition 11 was determined. The permittee shall also record all 3-hour periods of operation during which the average temperature difference across the catalyst bed is less than 80 percent of the average temperature difference of the device during the most recent performance test at which compliance with Condition 11 was determined. [40 CFR 60.615(c)(2)]
17. The permittee shall keep up-to-date, readily accessible continuous records of the flow indication specified under condition 12.b, as well as up-to-date, readily accessible records of all periods when the vent stream is diverted from the control device or has no flow rate. [40 CFR 60.615(d)]

NSPS Subpart III Reporting

18. For the purposes of the NSPS Subpart III requirements, the permittee is exempt from the quarterly reporting requirements contained in 40 CFR 60.7(c) of the General Provision. [40 CFR 60.615(i)]
19. The permittee shall submit to LRAPA semiannual reports of the following information. [40 CFR 60.615(j)]
- 19.a. Exceedances of monitored parameters recorded under Condition 16. [40 CFR 60.615(j)(1)]
- 19.b. All periods recorded under Condition 17 when the vent stream is diverted from the control device or has no flow rate. [40 CFR 60.615(j)(2)]
20. The requirements of Condition 19 remain in force until and unless EPA, in delegating enforcement authority to a LRAPA under section 11(c) of the Clean Air Act, approves reporting requirements or an alternative means of compliance surveillance adopted by LRAPA. In that event, the permittee will be relieved of the obligation to comply with Condition 19, provided that they comply with the requirements established by LRAPA. [40 CFR 60.615(k)]
21. LRAPA will specify appropriate reporting and recordkeeping requirements where the permittee seeks to demonstrate compliance with the standards specified under Condition 11 other than as provided by Condition 12. [40 CFR 60.615(l)]

Group 1 (SF-1) RTO and Group 2 (SF-2) Tail Gas Boiler Requirements

22. The permittee shall monitor and record the temperature in the destruction bed of the RTO at Group 1 (SF-1), on a 15-minute basis.
 - 22.a. On a 3-hour block average, the permittee shall identify and record all temperature excursions in the destruction bed of the RTO below 1,400 degrees Fahrenheit (760 degrees Celsius), with the exception of a startup or shutdown. The 3-hour block average temperature for the RTO shall be the average temperature of the three (3) chambers in the RTO. [LRAPA 32-007(1)]
 - 22.b. For the temperature excursions defined in Condition 22.a, the permittee shall use the "SF-1 on-line, RTO down" and "SF-1 down, RTO down" emission factors in Condition 33.b, as appropriate, to calculate the emissions for each excursion, on a per-hour basis.
23. The permittee shall monitor and record the temperature of the exhaust from the Tail Gas Boiler (TGB), on a 15-minute basis.
 - 23.a. On a 3-hour block average, the permittee shall identify and record all temperature excursions in the exhaust gas from the TGB below 125 degrees Celsius (257 degrees Fahrenheit), with the exception of a startup or shutdown. [LRAPA 32-007(1)]
 - 23.b. For the temperature excursions defined in Condition 23.a, the permittee shall use the "SF-2 online, TGB down" and "SF-2 down, TGB down" emission factors in Condition 33.c, as appropriate, to calculate the emissions for each excursion, on a per-hour basis.

New Source Performance Standards Subpart VV (Subpart VV), Standards of Performance for Equipment Leaks of VOCs in the Synthetic Organic Chemical Manufacturing Industry (SOCMI) applicable to SF-3.

24. At Group 3 (SF-3), the permittee shall follow all applicable requirements of the Subpart VV including the requirements for:
 - 24.a. Pumps in Light Liquid Service [40 CFR 60.482-2]
 - 24.b. Standards for Pressure Relief Devices in Gas/Vapor Service [40 CFR 60.482-4]
 - 24.c. Standards for Sampling Connection Systems [40 CFR 60.482-5]
 - 24.d. Standards for Open-ended Valves or Lines [40 CFR 60.482-6]
 - 24.e. Standards for Valves in Gas/Vapor Service and in Light Liquid Service [40 CFR 60.482-7]
 - 24.f. Standards for Pumps and Valves in Heavy Liquid Service, Pressure Relief Devices in Light Liquid or Heavy Liquid Service, and Flanges and Other Connectors [40 CFR 60.482-8]
 - 24.g. Standards for Delay of Repair [40 CFR 60.482-9]
 - 24.h. Standards for Closed Vent Systems and Control Devices [40 CFR 60.482-10]
 - 24.i. Test Methods and Procedures [40 CFR 60.485]
 - 24.j. Recordkeeping Requirements [40 CFR 60.486]
 - 24.k. Reporting Requirements [40 CFR 60.487]

NSPS Subpart Dc Fuel Limitations and Recordkeeping Requirements

25. The permittee shall burn only natural gas fuel in the standby boiler.
26. The permittee shall keep a semi-annual record of the amount of natural gas burned in the standby boiler for a period of two (2) years. [40 CFR 60.48c (g), (i)]

NSPS Subpart Kb-Standards of Performance for Storage Vessels for Petroleum Liquids

27. NSPS Subpart Kb Applicable Requirement(s): Tank SM-9 shall comply with the following requirements of 40 CFR, Subpart Kb -"Standards of Performance for Volatile Organic Liquid Storage Vessels", except as allowed by Condition 27.j: [40 CFR 60.112b(a)(1)]
 - 27.a. Internal floating roof shall be equipped with one (1) of the following closure devices between the wall of the vessel and the edge of the internal floating roof: [40 CFR 60.112b(a)(1)(ii)]
 - 27.a.i Two (2) seals mounted one above the other so that each forms a continuous closure that completely covers the space between the wall of the storage vessel and the edge of the internal floating roof. The lower seal may be vapor-mounted, but both must be continuous. [40 CFR 60.112b(a)(1)(ii)(B)]
 - 27.a.ii The two (2) seals may be replaced with a foam-filled or liquid-mounted seal or a mechanical show seal that comply with 40 CFR 60.112b(a)(1)(i)(A) and 40 CFR 60.112b(a)(1)(i)(C).
 - 27.b. The internal floating roof shall rest or float on the liquid surface (but not necessarily in complete contact with it) inside a storage vessel that has a fixed roof. The internal floating roof shall be floating on the liquid surface at all times, except during initial fill and during those intervals when the storage vessel is completely emptied or subsequently emptied and refilled. When the roof is resting on the leg supports, the process of filling, emptying, or refilling shall be continuous and shall be accomplished as rapidly as possible. [40 CFR 60.112b(a)(1)(i)]
 - 27.c. Each opening in a non-contact internal floating roof except for automatic bleeder vents (vacuum breaker vents) and the rim space vents is to be provided a projection below the liquid surface. [40 CFR 60.112b(a)(1)(iii)]
 - 27.d. Each opening in the internal floating roof except for leg sleeves, automatic bleeder vents, rim space vents, column wells, ladder wells, sample wells, and stub drains is to be equipped with a cover or lid which is to be maintained in a closed position at all times (i.e., no visible gap) except when the device is in actual use. The cover or lid shall be equipped with a gasket. Covers and each access hatch and automatic gauge float well shall be bolted except when they are in use. [40 CFR 60.112b(a)(1)(iv)]
 - 27.e. Automatic bleeder vents shall be equipped with a gasket and are to be closed at all times when the roof is floating except when the roof is being floated off or is being landed on the roof leg supports. [40 CFR 60.112b(a)(1)(v)]
 - 27.f. Rim space vents shall be equipped with a gasket and are to be set to open only when the internal floating roof is not floating or at the manufacturer's recommended setting. [40 CFR 60.112b(a)(1)(vi)]
 - 27.g. Each penetration of the internal floating roof for the purpose of sampling shall be a sample well. The sample well shall have a slit fabric cover that covers at least 90 percent of the opening. [40 CFR 60.112b(a)(1)(vii)]

- 27.h. Each penetration of the internal floating roof that allows for passage of a column supporting the fixed roof shall have a flexible fabric sleeve seal or a gasketed sliding cover. [40 CFR 60.112b(a)(1)(viii)]
 - 27.i. Each penetration of the internal floating roof that allows for passage of a ladder shall have a gasketed sliding cover. [40 CFR 60.112b(a)(1)(ix)]
 - 27.j. If SM-9 stores a volatile organic liquid (VOL) with a maximum true vapor pressure of less than 3.5 KPa (0.5 psi), the tank is exempt from the requirements of Condition 27 and the associated monitoring specified in Condition 29. [40 CFR 110b(c)]
28. NSPS Subpart Kb Testing Requirement(s): See Condition 29.
29. NSPS Subpart Kb Monitoring Requirement(s): For the tank(s) identified in Condition 27, the permittee shall conduct the required inspection and testing in accordance with the following procedures and frequency:
- 29.a. Prior to filling the storage vessel with VOL, visually inspect the primary seal and the secondary seal (if one is in service) of the internal floating roof. If there are holes, tears, or other openings and/or defects in the seal or the seal fabric of the internal floating roof, the permittee shall repair the items before filling the storage vessel. [40 CFR 60.113b(a)(1)]
 - 29.b. For vessels equipped with a liquid-mounted primary seal per Condition 27.a.i, or a mechanical shoe primary seal per Condition 27.a.ii, the permittee shall visually inspect the internal floating roof and the primary seal or the secondary seal (if one is in service) through manholes and roof hatches on the fixed roof at least once every 12 months after initial fill: [40 CFR 60.113b(a)(2)]
 - 29.b.i. If the internal floating roof is not resting on the VOL surface, or there is VOL accumulated on the roof, or the seal is detached, or there are holes, tears, or other openings in the seal fabric, the permittee shall repair the defects or empty and remove the storage vessel from service within 45 days of identification of defects.
 - 29.b.ii. If the defects cannot be repaired or the vessel cannot be emptied within 45 days, the permittee may request for a 30-day extension in the written report required per Condition 30.e. Such extension request shall include, but not limited to, a demonstration of unavailability of alternate storage capacity and a specification or a schedule that will assure that the control equipment will be repaired or the vessel will be emptied as soon as possible.
 - 29.c. For vessels equipped with a double-seal system as specified in Condition 27.a.i, the permittee shall visually inspect the vessel in accordance with one of the following methods/procedures: [40 CFR 60.113b(a)(3)]
 - 29.c.i. On an annual basis, conduct the visual inspection as specified in Condition 29.b; or
 - 29.c.ii. Each time the storage vessel is emptied and degassed, and at least once every five (5) years (or at least every 10 years in the case of vessels conducting the annual visual inspection in accordance with Conditions 29.b and 29.c.i) if vessel is not emptied, visually inspect the internal floating roof, the primary seal, the secondary seal (if one is in service), gaskets, and slotted membranes and sleeve seals (if any). If the internal floating roof has defects; primary or secondary (if one is in service) seal has holes, tears, or other openings in the seal or seal fabric; the gaskets no longer close off the liquid surfaces from the atmosphere; and/or the slotted membrane has more than 10 percent open area, the permittee shall repair all the noted defects before refilling the storage vessel with VOL.

- 29.d. The permittee shall notify LRAPA in writing at least 30 days prior to filling or refilling of each storage vessel for which an inspection is conducted per Condition 29.a or 29.c.ii, and provide LRAPA an opportunity to observe. If the inspection conducted per Condition 29.c.ii cannot be planned 30 days in advance, the permittee shall notify LRAPA, at least 7 days prior to refilling the vessel, via telephone immediately followed by a written notification via express mail so that the notification is received by LRAPA at least 7 days prior to the refilling. [40 CFR 113b(a)(5)]
30. NSPS Subpart Kb Recordkeeping and Reporting: For Tank SM-9, the permittee shall adhere to the following recordkeeping requirements:
- 30.a. The permittee shall keep records showing the dimension of the storage vessel and an analysis showing the capacity of each tank. These records shall be kept for the life of the source. [40 CFR, 60.116b(a)/(b)]
- 30.b. The permittee shall keep the following record of each inspection performed per Condition 29: [40 CFR 60.115b(a)(2)]
- 30.b.i storage vessel ID,
- 30.b.ii date of the inspection, and
- 30.b.iii the observed condition of each component of the equipment inspected (e.g., seals, internal floating roof, and fittings).
- 30.c. The permittee shall maintain records of dates the storage vessels were emptied and refilled; and monitor and record the following product information: [40 CFR, 60.116b (c)]
- 30.c.i type of products stored in each tank; and
- 30.c.ii the maximum true vapor pressure of that product during the respective storage period.
- 30.d. When the maximum true vapor pressure of VOL stored in the tanks identified in Condition 27 is equal to or greater than 3.5 kPa (0.5 psi), as determined from Condition 30.c, the permittee shall notify LRAPA within 30 days. [40 CFR, 60.116b (d)]
- 30.e. If any of the conditions described in Condition 29.b are detected during the annual visual inspection required by Condition 29.b, a report shall be furnished to LRAPA within 30 days of the inspection. Each report shall identify the storage vessel, the nature of the defects, and the date the storage vessel was emptied or the nature of and date the repair was made. [40 CFR 60.115b(a)(3)]
31. For the life of the tank, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for all storage vessels with a capacity greater than or equal to 75 cubic meters that is used to store volatile organic liquids for which construction, reconstruction, or modification is commenced after July 23, 1984. [40 CFR 60.110b and 40 CFR 60.116b(b)]

Plant-wide Operating & Maintenance Requirements (O&M)

32. The permittee shall submit and follow an LRAPA approved O&M plan. The plan shall be submitted within 90 days of issuance of this permit. [LRAPA 32-007]

Plant-wide Recordkeeping and Reporting Requirements

33. **Semi-annual Synthetic Minor Report:** Beginning with the first 6-month period after the issuance of this permit, the permittee shall submit semi-annual reports by the 45th day after each semi-annual period for every semi-annual period this permit is in effect, one (1) copy of the following information for the preceding semi-annual reporting period (all totals shall be 12-month rolling totals): [LRAPA 34-120]:

33.a. Estimation method for total VOC, total HAP and individual HAP 12-month rolling emissions:

33.a.i Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for VOC:

$$E = \Sigma(EF \times P)/2000$$

where,

- E = Pollutant emissions (ton/yr);
- EF = Pollutant emission factor (lb/hr see Conditions 33.b, 33.c, 33.d and 33.f.);
- P = Process production (hours/year)

33.a.ii The combined HAP calculation will include a summation of the individual HAP compound emissions as calculated:

$$E_{HAPcombined} = \Sigma_{HAP\ single}(EF_{HAPsingle} \times P)/2000$$

where,

- $E_{HAPcombined}$ = Total HAP pollutant emissions (ton/yr);
- $EF_{HAPsingle}$ = Pollutant emission factor (lb/hr, see Conditions 33.b, 33.c, 33.d, and 33.f.);
- P = Process production (hours/year)

33.b. The permittee shall use hours of operation and the following emission factors to estimate emissions for process equipment that is controlled by the RTO (all values are in pounds per hour of operation):

Pollutant	SF-1 on-line, RTO on-line	SF-1 on-line, RTO down	SF-1 down, RTO on-line	SF-1 down, RTO down
HCHO	0.18	12.39	0.16	10.88
MeOH	0.30	14.16	0.14	6.44
Phenol	0	0.75	0	0.75
DME	0.48	40.15	0.26	21.81
CO	6.4	317.4	2.07	103.5
Total VOC	0.96	67.45	0.56	39.88

- 33.c. The permittee shall use the following emission factors to estimate emissions for Process Equipment that is controlled by the Tail Gas Boiler (all values are in pounds per hour operation):

Pollutant	SF-2 on-line, TGB on-line	SF-2 on-line, TGB down	SF-2 down, TGB on-line	SF-2 down, TGB down
HCHO	0.09	16.24	0	0
MeOH	0.06	74.91	0	0
DME	0.01	0.86	0	0
CO	0	32.4	0	0
Total VOC	0.15	92.01	0	0

- 33.d. The permittee shall use the following emission factors to estimate emissions for Process Equipment that is controlled by the SF-3 Catalytic Incinerator (all values are in pounds per hour operation):

Pollutant	SF-3 on-line, CI on-line	SF-3 on-line, CI on-line	SF-3 down, CI down
HCHO	0.01	0.01	0
MeOH	0.01	0.01	0
DME	1.24	1.24	0
CO	2.00	2.00	0
Total VOC	1.26	1.26	0

- 33.e. The 12-month total emissions estimations shall also include the estimation of emissions from ST-1 using the emission factors in the table below.

Pollutant	Emission Factor (lb/hour)
HCHO	0.0002
MeOH	0.165
Phenol	0.0004
Total VOC	0.165

- 33.f. The 12-month total emissions estimations shall also include the estimation of emissions from Fugitives using the emission factors in the table below. Emission factors are from the application submitted February 24, 2006.

Pollutant	Emission Factor (lb/hour)
HCHO	0.04166
MeOH	0.37353
Phenol	0.57848
Total VOC	0.99377

34. The report required by Condition 33 shall also include the following information.

<u>Parameter</u>	<u>Minimum Recording Frequency</u>
a. Estimation of total VOC, total HAPs, and individual HAPs 12-month rolling emissions (tons).	Monthly
b. Temperature excursions in the destruction bed of the RTO below 1,400°F.	Hourly
c. Temperature excursions in the exhaust gas from the Tail Gas Boiler below 125°C.	Hourly
d. Hours of operation identifying the status of each SF-1, SF-2 and SF-3.	Daily
e. Amount of natural gas burned in the standby boiler.	Semi-annually
f. Amount of formaldehyde produced (lb/yr).	Monthly
f. Total natural gas usage (cf/yr).	Semi-annually

35. The format of the semi-annual report and associated calculations may be required to be modified subject to LRAPA approval.
36. The permittee shall report any entries in the upset log as required per Condition G15. The permittee shall keep a log of upsets and report upsets to LRAPA based upon the scenarios detailed in the LRAPA approved O&M plan required by Condition 32.
37. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office:

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

38. On a semi-annual basis, the permittee shall submit a revised Equipment and Emission Point Information list for FUG-1 (fugitive emission components) when new devices are added to the plant.

General Testing Requirements

39. The permittee shall conduct testing within 12 months of issuance of this permit to verify the emission factors listed in Conditions 33.b, 33.c, and 33.d. The testing shall also verify compliance with the NSPS Subpart III emission limit in Condition 11. The emission points and pollutants required to be tested are listed in the following table.

Monitoring Point	Pollutant
SF-1: Inlet to RTO and RTO outlet	Total VOC
	Formaldehyde
	Methanol
	DME
	Phenol
SF-2: Inlet to Tail Gas Boiler and Tail Gas Boiler Exhaust	Total VOC
	Formaldehyde
	Methanol
	DME
	CO
SF-3: Inlet to Catalytic Incinerator and Catalytic Incinerator exhaust	Total VOC
	Formaldehyde
	Methanol
	DME

- 39.a. The following test methods must be used for the corresponding pollutant emissions:
- 39.a.i Total VOC (as propane) – EPA Method 25(FID)
 - 39.a.ii Formaldehyde – NCASI CI/WP-98.01
 - 39.a.iii Methanol – NCASI CI/WP-98.01
 - 39.a.iv Phenol – NCASI CI/WP-98.01
 - 39.a.v DME - EPA Method 18(GC/FID)
 - 39.a.vi CO – Modified EPA Method 10
 - 39.a.vii O2 and CO2 – EPA Method 3A
 - 39.a.viii Volumetric exhaust flow rate – EPA Method 2
 - 39.a.ix Exhaust gas moisture content – EPA Method 4

- 39.b. Formaldehyde, methanol, phenol and DME testing (where required) shall be measured separately and concurrently with total VOC. Total VOC shall be determined by the summation of mass emissions results from EPA Method 25A (as propane), methanol, formaldehyde, phenol, and DME (where applicable). Total VOC shall not be determined on an "as carbon" basis.
- 39.c. The permittee may submit a plan for alternative field sampling and analysis for the equipment listed in this condition. This plan must be approved by LRAPA prior to any testing, and must be submitted within two (2) months prior to testing.
- 39.d. The following parameters shall be monitored and recorded during the source test and/or field testing:
- 39.d.i Visible emissions as measured by EPA Method 9 for a period of at least six (6) minutes during or within 30 minutes before or after each test run for the Tail Gas Boiler;
- 39.d.ii The following process parameters will be recorded for the Tail Gas Boiler:
- Tail gas feed rate (lbs/hr, scfm);
 - Firebox temperature (° C);
 - Residual oxygen content (%);
 - Steaming rate (lbs/hr);
 - Total hydrocarbon in tail gas (ppm as propane);
 - Average formaldehyde production rate (tons/hr); and
 - Emission results in pounds pollutant per hour of operation of Tail Gas Boiler (lbs/hr).
- 39.d.iii The following process parameters will be recorded for the RTO.
- Average RTO bed temperature for each run;
 - Average formaldehyde production rate (tons/hr); and
 - Emission results in pounds pollutant per hour of operation of RTO (lbs/hr).
- 39.d.iv The following process parameters will be recorded for the Catalytic Incinerator
- Temperature immediately before and after the catalyst bed (° C);
 - Residual oxygen content (%);
 - Average formaldehyde production rate (tons/hr);
 - Emission results in pounds pollutant per hour of operation of Catalytic Incinerator (lbs/hr); and
 - Vent stream flow to the catalytic incinerator as per Condition 12.b
- 39.d.v All tests must be conducted in accordance with the ODEQ's *Source Sampling Manual* and the approved pretest plan. The pretest plan must be submitted at least 15 days in advance and approved by LRAPA. Test data and results must be submitted for review to LRAPA within 60 days of testing unless otherwise approved in the pretest plan.

- 39.d.vi Only regular operating staff may adjust the control device or production processes and emission control parameters during the source test and within two (2) hours prior to the source test. Any operating adjustments made during the source test, which are a result of consultation with source testing personnel, equipment vendors or consultants, may render the source test invalid.

Fee Schedule

40. In accordance with adopted regulations, the permittee will be invoiced annually for the Compliance Determination Fee and for all applicable fees associated with Synthetic Minor status. [LRAPA 34-150]

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GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request.
- G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. 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.

Performance Standards and Emission Limits

- G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]
- G5. The permittee shall not discharge from any source whatsoever such quantities of air contamination which cause injury, detriment, public nuisance or annoyance to any persons or to the public or which cause injury or damage to business or property; such determination to be made by LRAPA. [LRAPA 32-090(1)]
- G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]
- G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]
- G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 33-030(2)]
- G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(2)]
- G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are considered unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in

violation of any applicable air quality rule or permit condition resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. [LRAPA 32-001(1)]

Excess Emissions: Notification and Record-keeping

G12. The permittee must immediately (i.e., as soon as possible, but in no case more than one (1) hour after the beginning of the excess emissions period) notify LRAPA by telephone or in person of all cases of excess emissions due to upset or breakdown. [LRAPA 36-020(1)] Notification shall include:

- a. source name;
- b. nature of the emissions problem;
- c. name of the person making the report;
- d. name and telephone number of the contact person for further information;
- e. date and time of the onset of the upset condition;
- f. whether or not the incident was planned;
- g. equipment involved in the upset or breakdown;
- h. estimated type and quantity of excess emissions;
- i. estimated time of return to normal operations;
- j. efforts made to minimize emissions; and
- k. description of remedial actions to be taken.

Notification shall be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

Follow-up reporting, if required by LRAPA, shall contain all information required by Condition G15.

G13. At each reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)]

G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.

G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. [LRAPA 36-025(3) and 36-030(1)] The upset log shall include the following:

- a. date and time each event was reported to LRAPA;
- b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
- c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;

- d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
- e. final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for two (2) calendar years.
[LRAPA 36-025(4)]

Excess Emissions: Scheduled Maintenance

- G16. Where it is anticipated that shutdown, by-pass, or operation at reduced efficiency of production equipment or air pollution control equipment for necessary scheduled maintenance may result in excess emissions, the permittee must obtain prior LRAPA approval of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance shall be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. [LRAPA 36-015(1)] The application shall include the following:
- a. reasons explaining the need for maintenance, including why it would be impractical to shut down the source operation during the period, and why the by-pass or reduced efficiency could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
 - b. identification of the specific production or emission control equipment or system to be maintained;
 - c. nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and
 - d. identification of specific procedures to be followed which will minimize excess emissions.
- G17. No scheduled maintenance which is likely to result in excess emissions shall occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced "Stage I Red" woodstove advisory period, in areas determined by LRAPA as PM₁₀ Nonattainment Areas. [LRAPA 36-015(4)]
- G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-025(2), the permittee shall immediately notify LRAPA by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(5)]

Air Pollution Emergencies

- G19. The permittee shall, upon declaration of an air pollution episode, take all actions specified in Tables 1, 2, and 3 of LRAPA's Title 51 (see Attachment A) and shall particularly put into effect the LRAPA-approved preplanned abatement strategy for such condition, if applicable. [LRAPA 51-015]

Notification of Construction/Modification

- G20. The permittee shall notify LRAPA in writing and obtain approval in accordance with LRAPA 34-035 before:

- a. constructing or installing any new source of air contaminant emissions, including air pollution control equipment; or
- b. modifying or altering an existing source that may significantly affect the emissions of air contaminants, or
- c. making any physical change which increases emissions; or
- d. changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation to levels above those contained in the permit application and reflected in this permit and which result in increased emissions.

Notification of Name Change

- G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

- G22. Application for renewal of this permit must be submitted not less than 60 days prior to the permit expiration date. A Filing Fee, an Application Processing Fee, and an Annual Compliance Determination Fee must be submitted with the application for the permit renewal. [LRAPA 34-035]
- G23. The procedure for issuance of a permit shall apply to renewal of a permit. If a completed application for a renewal of a permit is filed with LRAPA in a timely manner, prior to the expiration date of the permit, the permit shall not be deemed to expire until final action has been taken on the renewal application to issue or deny a permit. [LRAPA 34-130(16)]

Termination Conditions

- G24. This permit shall be automatically terminated: [LRAPA 34-140(2)]
- a. within sixty (60) days after sale or exchange of the activity or facility which requires a permit;
 - b. upon change of nature of the activities, operations, emissions, or discharges from those of record in the last application;
 - c. within one (1) year after a plant closure lasting continuously for one (1) or more years;
 - d. upon issuance of a new, renewal, or modified permit for the same operation; or
 - e. upon written request of the permittee.
- G25. In the event that it becomes necessary to suspend or terminate this permit due to non-compliance with the terms of the permit, unapproved changes in operation, false information submitted in the application or any other cause, LRAPA shall notify the permittee by registered or certified mail of its intent to suspend or revoke the permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective twenty (20) days from the date of mailing of such notices unless, within that time, the permittee requests a hearing. Such a request for hearing shall be made in writing and shall state the grounds for such a request. [LRAPA 34-140(3)]

- G26. Termination of this permit resulting from continuous plant closure shall subject the source to review as a new non-permitted source upon application to operate the facility. [LRAPA 34-140(4)]
- G27. If LRAPA finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may suspend or terminate this permit, effective immediately. Notice of such suspension or termination must state the reasons for such action and advise that the permittee may request a hearing. Such a request for a hearing shall be made in writing within ninety (90) days of the date of the suspension and shall state the grounds for the request. [LRAPA 34-140 (5)]
- G28. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA 34-140(6)]
- G29. The permittee shall submit, by April 20 of each year, the emission inventory form provided by LRAPA.

DW/bp [revised 10/24/01, 4/18/06]