

**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:**

Carothers & Son, LTD  
71 S. Bertelsen Road  
Eugene, Oregon 97402

**INFORMATION RELIED UPON:**

Application No.: 55081  
Date Received: April 30, 2010

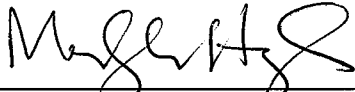
**PLANT SITE LOCATION:**

71 S. Bertelsen Road  
Eugene, Oregon 97402

**LAND USE COMPATIBILITY  
STATEMENT:**

Approving Authority: City of Eugene  
Approval Date: June 15, 2010

**ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY**



Merlyn L. Hough, Director

OCT 25 2010

Dated

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

<b>Table 1 Code</b>	<b>Source Description</b>	<b>SIC</b>
Part A, 7	Surface coating operations whose actual or expected usage of coating materials is less than 250 gallons per month, excluding sources that exclusively use non-VOC and non-hazardous air pollutant containing coatings (e.g., powder coating operations).	3556

## 1.0 STATEMENT OF PURPOSE

- 1.1 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air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit.

## 2.0 EMISSION STANDARDS AND LIMITS

- 2.1 Emission units** Fugitive VOC emissions (EU-1) are predominantly from surface coating operations and miscellaneous solvent usage. A spray booth (EU-2) is used to control particulate emissions from surface coating. Particulate matter from metal working (EU-3).
- 2.2 Metal Fabrication NESHAP Standards** Beginning July 25, 2011 the permittee must follow the Area Source Standard for Nine Metal Fabrication and Finishing Source Categories NESHAP (40 CFR 63 Subpart XXXXXX) management, notification, reporting, and recordkeeping practices.
- 2.3 Production limits** The permittee is prohibited from using more than 3000 gallons of any VOC containing product a year without first notifying LRAPA.
- 2.4 Visible emission limits** Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour. "Opacity" means the degree to which an emission reduces transmission of light and obscures the view of an object in the background.
- 2.5 Fugitive Emissions** The permittee must take reasonable precautions for preventing fugitive dust emissions.
- 2.6 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. LRAPA will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 2.7 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.
- 2.8 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

### 3.0 RECORDKEEPING AND REPORTING REQUIREMENTS

- 3.1 Records** The permittee must maintain records of the information identified in Condition 3.2 for at least 2 years from the date of the record.
- 3.2 Reports** The permittee is required to report to LRAPA by **February 15<sup>th</sup>** of each year the following information:
- a. Number of gallons of VOC containing coatings during the previous year; and
  - b. Written log of all air quality or nuisance complaints and how each complaint was handled.
- 3.3 Permit Renewal** An application to renew the permit is due 60 days prior to expiration of the permit.
- 3.4 Construction or Modification Notices** The permittee must notify LRAPA before making a physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions or constructing or modifying any air pollution control equipment.
- 3.5 Notice of Change of Ownership or Company Name** The permittee must promptly notify LRAPA of any change of mailing address, company name, or plant ownership. The permit will expire 60 days after a change in the legal entity owning/operating the facility unless application, with appropriate fees, is made to transfer the permit to the new entity.
- 3.6 Where to Send Reports and Notices** The reports and notices, with the permit number prominently displayed, must be sent to the LRAPA office identified on the cover page of the permit.
- ### 4.0 FEES
- 4.1 Fees** The Annual Fee specified in LRAPA Section 37-0020, Table 2, Part 2 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.

## 5.0 GENERAL CONDITIONS

- 5.1 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.
- 5.2 Open Burning** The permittee may not conduct any open burning except when approved by LRAPA in advance.
- 5.3 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. Accumulation of asbestos containing material is prohibited. If you have asbestos questions, contact the LRAPA office identified below.
- 5.4 Permit Availability** The permittee must have a copy of the permit available at all times.
- 5.5 LRAPA Inspections** The permittee must allow the 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.
- 5.6 Legal Disclaimers** 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.
- 5.7 Permit Revocation** This permit is subject to revocation for cause.
- 5.8 LRAPA Contact** Call the LRAPA office in Springfield at (541) 736-1056.

Lane Regional Air Protection Agency

**BASIC  
 AIR CONTAMINANT DISCHARGE PERMIT  
 REVIEW REPORT**

**Carothers & Son, LTD**  
 71 S. Bertelsen Road  
 Eugene, Oregon 97402

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
X	N/A	X	N/A	(6X)	1

1. The proposed permit is a new permit for an existing source.
2. The permittee operates a pneumatic, mechanical, and gravity conveyance equipment manufacturing facility.
3. This facility qualifies for a Basic ACDP because surface coating operations actual or expected usage of coating materials is less than 250 gallons per month and do not use non-VOC and non-HAP containing coatings.
4. The source is located in an attainment area for all pollutants except for PM<sub>10</sub>. The Eugene Springfield Air Quality Maintenance Area is a nonattainment area for PM<sub>10</sub>.
5. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases the emission will not exceed 5 tons of PM or PM<sub>10</sub> 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 Section 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA Section 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.

MTL/rcf  
 10/21/2010

Carothers and Son, LTD

	Usage gallons	lbs./gal	VOC reportable		Triethylamine (121448)		Ethylbenzene (100414)		Toluene (108883)		Xylene (1330207)		Total HAP Lbs.
			% by weight	lbs.	% by weight	lbs.	% by weight	lbs.	% by weight	lbs.	% by weight	lbs.	
AAQD White Base 1 (758001)	1116 *	9.3	47.3%	4,933	10.0%	1,042	10.0%	1,042	10.0%	1,042	30.0%	3,127	6,255
BARRIER III METAL-Primer Off-White	1116 *	10.7	42.4%	5,055	-	-	10.0%	1,191	-	-	40.0%	4,765	5,957
Acetone		6.6	0.0%	-	-	-	-	-	-	-	-	-	-
<b>Total: 1116 **</b>				<b>5,055</b>		<b>0.52</b>		<b>0.60</b>		<b>0.52</b>		<b>2.38</b>	<b>8,042</b>
				2.53									1000 lbs.
													5000 lbs.

\*Based on highest emission rate from primer OR top coat based on total coating annual use submitted in application to determine applicable permit thresholds.

\*\*Total Amount used at facility is 1116.