

LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)
TITLE V OPERATING PERMIT

Lane Regional Air Protection Agency
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056 Toll Free: (877) 285-7272
Fax: (541) 726-1205 Web Page: www.lrapa.org

Issued in accordance with the provisions of ORS 468.040
and based on the land use compatibility findings included in the permit record.

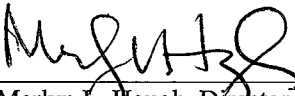
ISSUED TO:
Navistar, Inc.
91320 Coburg Industrial Way
Coburg, Oregon 97408-9305

INFORMATION RELIED UPON:
Permit No.: 205160
Request for Construction Review
Received: 12/09/09

PLANT SITE LOCATION:
91320 Coburg Industrial Way
Coburg, Oregon 97408-9305

LAND USE COMPATIBILITY STATEMENT:
From: City of Coburg
Dated: December 30, 1998

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

JAN 27 2010

Date

Nature of Business: Recreational Vehicle Manufacturer

Primary SIC: 3716

RESPONSIBLE OFFICIAL:

Title: Vice-President

FACILITY CONTACT PERSON:

Name: Glen Goins
Title: Environmental Coordinator
Phone: (541) 681-8147

Addendum No. 2
Minor Permit Modification

In accordance with OAR 340-218-0170(1), Title V Operating Permit No. 205160 is hereby amended to incorporate the applicable Reinforced Plastic Composites Production MACT requirements as federally enforceable permit limits. Additionally, in accordance with LRAPA 42-0042 this modification removes the short term PSELs set forth in condition 59 of the permit. Requirements for the composites manufacturing operations are listed as follows:

Proposed Permit Conditions40 CFR 63 Subpart WWWW Emission Limits

1. Applicable Requirement: Organic HAP Emission Limits [Subpart WWWW of Part 63]
On and after the 40 CFR Part 63, Subpart WWWW compliance date for existing sources (April 21, 2006), Conditions 1 through 8 of this addendum are enforceable, applicable requirements and the HAP contents of all resins and gelcoats used in the composites manufacturing operations shall not exceed the limits contained in the following table:

Table 1. Organic HAP Emission Limits

Resin or Gel Coat	HAP Content Weight Percent	Emission Rate (lbs/ton)
Corrosion resistant resin	46.2	113
Low Flame Spread/ Low smoke products	60	497
Non-corrosion resistant resin (unfilled)	38.4	87
Non-corrosion resistant resin (filled)	38.4	87
Tooling resin	91.4	254
White/off white gelcoat	30	267
Pigmented colored gelcoat	37	377
Clear gelcoat	44	522
Tooling gelcoat	40	440
Polymer casting resin	N/A	N/A

2. Monitoring: Organic HAP Emissions Limits

The permittee shall demonstrate compliance with the organic HAP Emission Limits in Condition 1 of this addendum within 30 days of the end of each month., using either of the following methods:

- 2.a. Compliant Materials Option

The permittee shall record the HAP content of each resin and gelcoat used in a format that readily identifies the applicable permit limit and material type.

- 2.a.i. Certified product data sheets (CPDS), material safety data sheets (MSDS), or manufacturers product specification sheets may be used to provide HAP content for resin and gelcoat.
- 2.a.i.A. Although this permit does not require testing of raw materials to determine HAP content, LRAPA may require testing using an approved EPA Method to confirm the HAP content of resins and gelcoats.
- 2.a.i.B. Where a material supplier or manufacturer reports the HAP content data as a range of values, the upper limit of that range will be used for determining compliance.

- 2.b. Emission Rate Averaging Option

Demonstrate each month that you meet the weighted average emission rate of the open molding operations.

- 2.b.i. Each month calculate the weighted average emission rate for your facility for that month to determine which emissions rate you must meet. To do this, you must sum the product of the individual emission rates corresponding to each limit of Condition 1 of this addendum and the amount of resin and gelcoat used in each operation and divide the numerator by the total amount of resin and gelcoat used in the operation. Use the following equation to calculate the weighted average emission rate for open molding operations.

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^n (EL_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

where:

- EL_i = Organic HAP emission limit from Operation i, pounds per ton from Condition 1 of this addendum;
- Material_i = Resin or gelcoat used during the calendar month for Operation i, tons; and
- n = Number of operations.

- 2.b.ii. Each month calculate your actual weighted average organic HAP emissions factor. Do this by multiplying the actual open molding operation organic HAP emissions factors and the amount of resin and gel coat used in each operation type, summing the results, and dividing this sum by the total amount of resin and gel coat used in the operation groupings. You must calculate your actual individual HAP emissions factors for each operation type using the Table of Emission Factors in Attachment A to Review Report. Use the following equation to calculate your actual weighted average organic HAP emissions factor.

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^n (\text{Actual Operations } EF_i \times \text{Material}_i)}{\sum_{i=1}^n \text{Material}_i}$$

where:

- Actual Individual EF_i = *Actual* organic HAP Emissions Factor
- Material_i = Resin or gelcoat used during the last 12 calendar months for Operation i, tons; and
- n = Number of operations.

- 2.b.iii. Compare the values calculated in Conditions 2.b.i and 2.b.ii of this addendum. If each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit, then you are in compliance.

3. Recordkeeping Requirement: Organic HAP Emission Limits

- 3.a. The permittee must collect and keep records of resin and gel coat use and organic HAP content. Resin and gel coat use records may be based on purchase records if the permittee can reasonably estimate how the resin and gel coat is applied. The organic HAP content records may be based on MSDS or on resin and gel coat specifications supplied by the resin and gel coat supplier.
- 3.b. All records shall be collected and maintained in accordance with Conditions 64 through 68 of the permit.

4. Reporting Requirement: Organic HAP Emission Limits
 - 4.a. The permittee shall certify compliance with the Subpart WWWW organic HAP emission limits as part of the semi-annual compliance certification submitted in accordance with Conditions 69 through 72 of the permit.

5. Applicable Requirement: Organic HAP Work Practice Standards
 - 5.a. The permittee shall not use cleaning solvents that contain HAP, except that organic HAP containing cleaners may be used to clean cured resin and gel coat from application equipment. Application equipment includes any equipment that directly contacts resin or gel coat.
 - 5.b. The permittee shall keep containers that store HAP-containing materials closed or covered except during the addition or removal of materials. Bulk HAP-containing materials storage tanks may be vented as necessary for safety.

6. Monitoring: Requirements: Organic HAP Work Practice Standards
 - 6.a. The permittee shall train all employees involved in the application or cleanup of resin or gel coat as to the work practice standards in Conditions 5.a and 5.b of this addendum.
 - 6.b. The permittee shall maintain a log of all training activities.
 - 6.c. The permittee shall conduct refresher training annually.

7. Recordkeeping Requirement: Organic HAP Work Practice Standards
 - 7.a. The permittee shall maintain records of all training activities and training materials.
 - 7.b. All records shall be collected and maintained in accordance with Conditions 64 and 65 of the permit.

8. Reporting Requirements: Organic HAP Work Practice Standards
 - 8.a. The permittee shall submit monitoring records and compliance certifications in accordance with Conditions 69 through 72 of the permit.

59. ~~The short-term plant site emissions shall not exceed the following: [LRAPA 34 060 (4 and 5)]~~

Emission Unit ID	Pollutant	Short-Term PSEL	Units	Monitoring Requirements	
				Method	Permit Condition
Paint 96 Assembly 96 Cabinet Shop 96 Paint 98 Assembly 98 Cabinet Shop 98	PM	4,315	lb/month	Recordkeeping	Error! Reference
	PM10	4,315	lb/month	Recordkeeping	Error! Reference
	VOC	99,470	lb/month	Recordkeeping	Error! Reference
	CO	2,140	lb/month	Recordkeeping	Error! Reference
	NO _x	9,000	lb/month	Recordkeeping	Error! Reference

DEFINITIONS FOR MACT PERMIT CONDITIONS

- d1. CLEAR GEL COAT means a gel coat that contains no pigments.
- d2. FILLED RESIN means a resin containing inert filler material equal to or greater than thirty-five (35) percent by weight.
- d3. FILLERS means, in reference to wood products finishing, materials which are applied to a wood product, and whose primary purpose is to build up, or fill the voids and imperfections in the wood product to be coated. This shall not include composite wood edge fillers.
- d4. GEL COAT means a thermosetting resin, either pigmented or clear, that contains styrene (CAS No. 100-42-5), and provides a cosmetic enhancement or protects the underlying layers of a plastic composite material. Gel coat does not include thermoplastic material (e.g., rotationally molded polyethylene), or thermosetting resins that do not contain styrene or methyl methacrylate (e.g., epoxies).
- d5. GENERAL PURPOSE POLYESTER RESINS are materials that are not corrosion resistant, fire retardant, high strength, vapor suppressed, or gel coats.
- d6. GENERAL TOPCOAT is any type of topcoat except metallic/iridescent topcoat, and any topcoat applied as part of a multistage topcoat system.
- d7. INERT FILLER means any non-HAP, non-VOC material, such as silica micro-spheres or micro-balloons, added to a resin or gel coat to alter the density of the resin or gel coat or to change other physical properties of the resin or gel coat.
- d8. MOLD-SEAL COATING means, in reference to wood products finishing, the initial coating applied to a mold or repaired mold to provide a smooth surface which, when coated with a mold release coating, prevents products from sticking to the mold.
- d9. PIGMENTED GEL COAT means a gel coat that contains a coloring substance.
- d10. PLASTICS are various synthetic materials chemically formed by the polymerization of organic (carbon based) substances. Plastics are usually compounded with modifiers, extenders, and/or reinforcers. They are used to produce pipe, solid sheet, film, or bulk products.
- d11. PRODUCTION GEL COAT means a gel coat that is used to manufacture parts and products.
- d12. PRODUCTION RESIN means any thermosetting resin that is used to manufacture parts and products.
- d13. RESIN means any thermosetting resin that contains styrene (CAS No. 10042-5), methyl methacrylate (CAS No. 80-62-6) or both and is used to manufacture parts or products. Resin does not include gel coat, tooling gel coat, thermoplastic resin (e.g., rotationally molded polyethylene), or thermosetting resins that do not contain styrene or methyl methacrylate (e.g., epoxies).
- d14. TOOLING GEL COAT means the gel coat used in the construction of molds or prototypes (plugs).
- d15. TOOLING RESIN means the resin used in the construction of molds or prototypes (plugs).
- d16. VAPOR SUPPRESSED RESIN is a polyester resin material which contains additives to reduce VOC evaporation loss to less than sixty (60) grams per square meter of surface area as determined and certified by resin manufacturers.

**LANE REGIONAL AIR POLLUTION AUTHORITY (LRAPA)
TITLE V OPERATING PERMIT**

1010 Main Street
Springfield, Oregon 97477

Telephone: (541) 736-1056
Fax: (541) 726-1205

Toll Free: (877) 285-7272
Web Page: www.lrapa.org

Issued in accordance with the provisions of
ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Navistar, Inc.
91320 Coburg Industrial Way
Coburg, Oregon 97408

INFORMATION RELIED UPON:

Application Number:	205160	
Application Received:	7/17/97	
Supplemented:	11/7/97	12/1/97
	03/9/98	10/22/98
	09/7/99	

PLANT SITE LOCATION:

91320 Coburg Industrial Way
Coburg, Oregon 97408

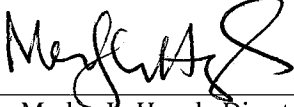
PERMIT HISTORY:

Original Title V Permit Issued	12/17/2001
Administrative Amendment	03/11/2004
C-ACDP	05/17/2005
Administrative Amendment	05/25/2006
Administrative Amendment	05/28/2009

LAND USE COMPATIBILITY STATEMENT:

From: City of Coburg
Dated: December 30, 1998

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

June 30, 2009

Date

Nature of Business: Recreational Vehicle Manufacturer

Primary SIC: 3716

RESPONSIBLE OFFICIAL:

Title: Manager, Environmental Affairs

FACILITY CONTACT PERSON:

Name: Jack Shih
Title: Manager
Phone: (312) 836-3921

Addendum No. 1
Administrative Amendment

In accordance with OAR 340-218-0150(1)(b), (c), and (d), Title V Operating Permit No. 205160, the ownership, the name of permittee, and the title of the Responsible Official are revised. The "ISSUED TO:" and "RESPONSIBLE OFFICIAL:" sections now read as

ISSUED TO:

Navistar, Inc.
91320 Coburg Industrial Way
Coburg, Oregon 97408

RESPONSIBLE OFFICIAL:

Title: Manager, Environmental Affairs

SLL/cw
06/30/09



June 30, 2009

Jack C. Shih, PE
Manager, Environmental Affairs
Navistar, Inc.
91320 Coburg Industrial Way
Coburg, OR 97408

Re: Permit Number: 205160
Modification Effective: June 30, 2009
Expiration Date: December 16, 2006

Dear Mr. Shih:

Lane Regional Air Protection Agency has issued the enclosed Addendum No. 1 to Title V Permit No. 205160 for the recreational vehicle manufacturing facility located at 91320 Coburg Industrial Way, Coburg, in accordance with all applicable rules and regulations. Please attach this addendum to the front of your permit.

Please read the changes in this permit addendum very carefully. Maintaining compliance with these permit conditions is important. If you have any questions about the permit, please feel free to call Sandra Lopez, Operations Manager, at 736-1056, Ext. 230.

Sincerely,

Merlyn L. Hough
Director

cw

Enclosures: Addendum No. 1
Comment Letter

**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)
TITLE V OPERATING PERMIT**

Lane Regional Air Protection Agency
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056 Toll Free: (877) 285-7272
Fax: (541) 726-1205 Web Page: www.lrapa.org

Issued in accordance with the provisions of ORS 468.040
and based on the land use compatibility findings included in the permit record.

ISSUED TO:
Monaco Coach Corporation -- Coburg
91320 Coburg Industrial Way
Coburg, Oregon 97408-9305

INFORMATION RELIED UPON:
Permit No.: 205160
Request for Construction Review
Received: 6/17/04
Supplemented: 6/30/04 and 10/11/05

PLANT SITE LOCATION:
91320 Coburg Industrial Way
Coburg, Oregon 97408-9305

LAND USE COMPATIBILITY STATEMENT:
From: City of Coburg
Dated: December 30, 1998

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

Date

Nature of Business: Recreational Vehicle Manufacturer

Primary SIC: 3716

RESPONSIBLE OFFICIAL:

Title: Vice-President

FACILITY CONTACT PERSON:

Name: Kurt W. Anderson

Title: Director, Environment, Health & Safety

Phone: (574) 862-7347

Addendum No. 1
Administrative Amendment

In accordance with OAR 340-218-0150(1)(h), Title V Operating Permit No. 205160 is hereby amended to incorporate into the Title V Operating Permit the enhanced Construction Air Contaminant Discharge Permit issued May 17, 2005.

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LIST OF ABBREVIATIONS USED IN THIS PERMIT

CAA	Clean Air Act
C _{CN}	VHAP content of finishing material (c)
CE	Amount of PM removed as a percentage of the PM produced
CFR	Code of Federal Regulations
CO	Carbon monoxide
CPDS	Certified Product Data Sheet
D _{COAT}	Density of coating
dscf	Dry standard cubic foot
D _i	Density of each raw VOC-containing material
D _{SOL}	Solids density of coating
EPA	US Environmental Protection Agency
E	Pollutant emissions, average VHAP content
EF _{NG}	Natural gas emission factors
EF _{WR}	Welding rod emission factor
EU	Emissions unit
F	Fraction coefficient for PM/PM ₁₀
FCAA	Federal Clean Air Act
gr/dscf	Grain per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by OAR 340-32-130
HVLP	High Volume Low Pressure
HW	Amount of VOC in waste disposed offsite
ID	Identification number
I&M	Inspection and maintenance
k	Conversion constant
LRAPA	Lane Regional Air Protection Agency
MACT	Maximum Achievable Control Technology
MMcf	Million cubic feet
MSDS	Material Safety Data Sheet
M _{VOC}	VOC of coating, minus water and exempt solvents
M _{VOCWT}	Weight fraction of VOC in coating, less water and exempt compounds
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO _x	Oxides of nitrogen
ODEQ	Oregon Department of Environmental Quality
OSHA	Occupational Safety and Health Administration
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
P	Quantity of natural gas consumed
PCD	Pollution control device
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 microns in size
PSEL	Plant Site Emission Limit
RM _i	Amount of each type of VOC-containing raw material used
SERP	Source Emission Reduction Plan
S _n	VHAP content of thinners
SO ₂	Sulfur dioxide
VE	Visible Emissions
V _{ES}	Volume of exempt compounds
VHAP	Volatile Hazardous Air Pollutant
V _M	Volume of coating
VOC	Volatile organic compound

VOC ₁	VOC content of raw material
V _w	Volume of water
W _{ES}	Weight of exempt compounds
W _n	Amount of VHAP, added to finishing materials
W _{PM}	Quantity of particulate collected by control equipment
WR	Quantity of welding rod consumed in tons/month and tons/yr;
W _s	Weight of volatile compounds
W _w	Weight of water

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and OAR 340-218-0120(2)]

2. All conditions in this permit are federally enforceable and LRAPA enforceable except Conditions 7.a and 7.b, which are enforceable by LRAPA only. [OAR 340-218-0060 and OAR 340-218-0070]

3. The permittee shall comply with the requirements of 40 CFR 63 Subpart JJ - National Emissions Standards for Hazardous Air Pollutant Emissions from Wood Furniture Manufacturing Operations. The requirements of 40 CFR 63 Subpart JJ are contained in the conditions of this permit. Compliance with these conditions shall not relieve the permittee from complying with all the applicable requirements of 40 CFR 63 Subpart JJ and 40 CFR 63 Subpart A - General Provisions. Attachment I contains a summary of the applicable requirements from 40 CFR 63 Subpart A.

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

4. The emissions units regulated by this permit are the following: [OAR 340-28-2120(3)]

Description of Emissions Unit	Emission Unit ID	Pollution Control Device (PCD)	PCD ID
Painting of Mid-line and High-line Product Paint Prep Final Paint Paint Repair Undercoating Final After Paint Small Parts Booths Thermoforming Glue Booth	Paint 96 and Paint 98	Work Practices Exhaust Filters Regenerative Thermal Oxidizer (RTO) Catalytic Oxidizer with Pre-concentrator (RCO)	PP-17, PP-98 (1&2), PB-98 (3-10) PB-1, PB-2, PB-3, PB-4, SPB-5, PB-18, RB-11, UC-6, UC-98-11, DC-98-13, HV-1, SPB-98-1 GB-98-5, MB-1, PB-13 (8-11), RTO-98-A&B, RCO-04-A&B

Description of Emissions Unit	Emission Unit ID	Pollution Control Device (PCD)	PCD ID
Cabinet Making for Mid-line and High-line Product Mill room Wood Finish	Cabinet Shop 96 and Cabinet Shop 98	Work Practices Baghouses Exhaust Filters	BH-9, BH-10, BH-98-11, DC-98-12, CS-7, CS-8 CS-98 (1-4)
Assembly for Mid-line and High-line Product Welding Chassis Paint General Assembly Lamination Dash Assembly Fiberglass Cutting	Assembly 96 and Assembly 98	Work Practices Exhaust Filters	CB-1, CB-98-1 CB-98-2, DC-15, GB-98-15
Service Center	Service	Exhaust Filters	SC-12 (a-d) MB-2
Natural Gas Combustion	CU	None	N/A

FACILITY-WIDE EMISSION LIMITS AND STANDARDS

The following tables contain summaries of applicable requirements, other than the Plant Site Emission Limits (PSELs), along with the monitoring methods for the emissions units for which those requirements apply. Where there is a conflict between the tables and the conditions of this permit, the conditions prevail.

Table 1. Facility-wide Emissions Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015(2) & 32-060*	5	Fugitive Emissions	Reasonable precautions to minimize fugitive emissions	I&M Recordkeeping	6
50-020	7.a	Odors	Nuisance/Odor	Recordkeeping	8
32-055	7.b	PM Fallout	Less/or equal to 250 µm	I&M Recordkeeping	8
32-010(1)(B) & (3)	12	Visible Emissions	20% Opacity	VE Periodic Monitoring	13

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-010(1)(B) & (3)	14	PM	0.1 gr/dscf	I&M Recordkeeping	15
32-030	16	PM	0.1 gr/dscf adjusted to 50% excess air or corrected to 12% CO	VE Periodic Monitoring	13
51-015	9	SERP	Reduce Emissions	Recordkeeping	10
40 CFR Part 68	11	Risk Management	Risk Management Plan	NA	NA

* As contained in the Oregon SIP, but removed from LRAPA's rules on 12-16-86 and replaced with 48-015(2).

5. Applicable Requirement: Particulate Fugitive Emissions [LRAPA 48-015(2) and 32-060]

- 5.a. The permittee shall not allow any materials to be handled, transported or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions shall include, but not be limited to, the following:
 - 5.a.i. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - 5.a.ii. Application of asphalt, approved road oil, water, or other suitable chemicals on any surfaces that can create airborne dusts;
 - 5.a.iii. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - 5.a.iv. Adequate containment during sandblasting or other similar operations;
 - 5.a.v. The covering of moving, open-bodied trucks transporting materials likely to become airborne; and
 - 5.a.vi. The prompt removal of earth or other material from paved areas which does or may become airborne. For purposes of this requirement, prompt shall be defined as within 24 hours of accumulation of dust-causing material.

6. Monitoring and Recordkeeping Requirement: Particulate Fugitive Emissions

- 6.a. At least once each month, the permittee shall conduct a visual inspection of the plant site for sources of particulate fugitive emissions. If sources of particulate fugitive emissions are identified, the permittee shall immediately take corrective action to minimize the particulate fugitive emissions, including but not limited to those actions identified in Condition 5.
- 6.b. The permittee shall maintain records of particulate fugitive emissions inspections and corrective actions taken pursuant to this condition.

7. Applicable Requirement: Nuisance Conditions [LRAPA 49-010 and 32-055]
 - 7.a. The permittee may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance.
 - 7.b. The permittee shall not cause or permit the emission of any particulate matter (PM) which is larger than 250 microns and that does or will deposit upon the real property of another person.
8. Monitoring and Recordkeeping Requirement: Nuisance Conditions
 - 8.a. The permittee shall maintain a log of all written complaints or complaints received, via telephone or facsimile, by the responsible official or a designated appointee that specifically refer to a complaint of odor or particulate fallout from the permitted facility. The log shall also include a record of the permittee's actions to investigate the complaint, make a determination as to the validity of the complaint and to resolve the complaint. Complaints shall be resolved, if possible, within two (2) days of receipt. The permittee shall promptly notify LRAPA of any complaints unresolved after ten (10) days of receiving the complaint.
9. Applicable Requirement: Air Pollution Episode [LRAPA 51-015]
 - 9.a. In the event of an Air Pollution Alert, Warning, or Emergency Episode is declared in the Coburg area by LRAPA, the permittee shall take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee shall take action when the permittee first becomes aware of such a declaration whether through news media, direct contact with LRAPA, or from other sources.
10. Monitoring and Recordkeeping Requirement: Air Pollution Episode
 - 10.a. The permittee shall maintain records of actions taken in response to all air pollution alerts, warnings, or emergency episodes.
11. Applicable Requirement: Risk Management Plan [40 CFR Part 68]
 - 11.a. Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements.
12. Applicable Requirement: Opacity [LRAPA 32-010(1)(B) & (3)]
 - 12.a. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere from any non-combustion source for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water vapor.
13. Monitoring and Recordkeeping Requirement: Opacity
 - 13.a. At least once each month, the permittee shall conduct a visible emissions inspection in accordance with EPA Method 22. The person conducting the visible emissions inspection does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9 including using the proper location to observe visible emissions. If visible emissions are identified during the survey the permittee shall perform one of the following:
 - 13.a.i. Take corrective action to eliminate the visible emissions; or
 - 13.a.ii. Conduct a modified EPA Method 9 visible emissions observation in accordance with the ODEQ's *Source Sampling Manual* within 24 hours on the source of the visible emissions. For purposes of this permit, "modified EPA Method 9" is defined as follows: Opacity shall be measured in accordance with EPA Method 9. For all standards, the minimum observation period shall be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or

exceed the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. [See the definition of "Opacity" in OAR 340-208-0010]

- 13.b. The permittee shall maintain records of all visible emissions inspections as specified in Condition 64, and all corrective actions taken pursuant to this condition.
14. Applicable Requirement: Particulate Emissions [LRAPA 32-015(2)]
 - 14.a. The permittee shall not cause or allow the emission of PM to exceed 0.1 grains per dry standard cubic foot for any air contaminant source.
15. Monitoring and Recordkeeping Requirement: Particulate Emissions
 - 15.a. At least once each year, the permittee shall conduct inspections of all particulate control devices for wear, plugging, abrasion, and integrity of mechanical and ancillary systems and make repairs as necessary.
 - 15.b. The permittee shall maintain records of all inspections and corrective actions pursuant to this condition.
16. Applicable Requirement: Particulate Emissions (Combustion Sources) [LRAPA 32-030]
 - 16.a. The permittee shall not cause or allow the emission of PM from any new combustion source (sources installed, constructed, or modified after June 1, 1970) in excess of 0.1 grains per dry standard cubic foot of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon dioxide.
17. Monitoring and Recordkeeping Requirement: Particulate Emissions (Combustion Sources)
 - 17.a. Monitoring for combustion sources shall be performed in accordance with Condition 13.

Table 2. Emissions Unit Specific Emission Limits and Standards

Emissions Unit ID	Applicable Requirements	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Assembly 96, Paint 96 and Assembly 98, Paint 98	38-020(1)(A)	18	VOC	VOC content for specific materials	Recordkeeping	19
	38-020(1)(A)	20	VOC	Work Practices - Application Methods	Recordkeeping	21
	38-020(1)(A)	22	VOC	Training Plan		23
	38-020(1)(A)	24	VOC	Work Practices - Pollution Prevention		25
Cabinet Shop 96 and Cabinet Shop 98	38-020(1)(A)	26.a	VOC	VOC content for specific materials	Recordkeeping	27
	40 CFR 63.802(b)(1)	28	VHAP content of finishing materials	a) 0.8 lb VHAP/lb solids for all coatings (weighted avg.), washcoats, sealers, topcoats, basecoats, and enamels b) 1.0 lb VHAP/lb solids for all stains c) 10% HAP content for thinners	Recordkeeping	29
	40 CFR 63.802(b)(2)	32	VHAP content of contact adhesives	0.2 lb VHAP/lb solids	Recordkeeping	33
	40 CFR 63.802(b)(3)	35	VOC content of strippable spray booth material	0.8 lb VOC/lb solids	Recordkeeping	36
	40 CFR 63.803(a)	38	VOC/VHAP	Work Practices Implementation Plan	Recordkeeping	50
	40 CFR 63.803(b)	39	VOC/VHAP	Operator Training Course	Recordkeeping	50

Emissions Unit ID	Applicable Requirements	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
	40 CFR 63.803(c)	40	VOC/VHAP	Inspection and Maintenance Plan	Recordkeeping	50
	40 CFR 63.803(d)	41	VOC/VHAP	Cleaning and Washoff Solvent Accounting System	Recordkeeping	50
	40 CFR 63.803(e)	42	VOC/VHAP	Chemical Composition of Cleaning and Washoff Solvents	Recordkeeping	50
	40 CFR 63.803(f)	43	VOC/VHAP	Spray Booth Cleaning	Recordkeeping	50
	40 CFR 63.803(g)	44	VOC/VHAP	Storage Requirements	Recordkeeping	50
	40 CFR 63.803(h)	45	VOC/VHAP	Application Equipment	Recordkeeping	50
	40 CFR 63.803(i)	46	VOC/VHAP	Line Cleaning	Recordkeeping	50
	40 CFR 63.803(j)	47	VOC/VHAP	Gun Cleaning	Recordkeeping	50
	40 CFR 63.803(k)	48	VOC/VHAP	Washoff Operations	Recordkeeping	50
	40 CFR 63.803(l)	49	VOC/VHAP	Formulation Assessment Plan for Finishing Operations	Recordkeeping	50

Emissions Unit ID	Applicable Requirements	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Assembly 96, Paint 96 and Assembly 98, Paint 98	38-020(1)(A)	18	VOC	VOC content for specific materials	Recordkeeping	19
	38-020(1)(A)	20	VOC	Work Practices - Application Methods	Recordkeeping	21
	38-020(1)(A)	22	VOC	Training Plan		23
	38-020(1)(A)	24	VOC	Work Practices - Pollution Prevention		25
Cabinet Shop 96 and Cabinet Shop 98	38-020(1)(A)	26.a	VOC	VOC content for specific materials	Recordkeeping	27
	40 CFR 63.802(b)(1)	28	VHAP content of finishing materials	a) 0.8 lb VHAP/lb solids for all coatings (weighted avg.), washcoats, sealers, topcoats, basecoats, and enamels b) 1.0 lb VHAP/lb solids for all stains c) 10% HAP content for thinners	Recordkeeping	29
	40 CFR 63.802(b)(2)	32	VHAP content of contact adhesives	0.2 lb VHAP/lb solids	Recordkeeping	33
	40 CFR 63.802(b)(3)	35	VOC content of strippable spray booth material	0.8 lb VOC/lb solids	Recordkeeping	36
	40 CFR 63.803(a)	38	VOC/VHAP	Work Practices Implementation Plan	Recordkeeping	50
	40 CFR 63.803(b)	39	VOC/VHAP	Operator Training Course	Recordkeeping	50
	40 CFR 63.803(c)	40	VOC/VHAP	Inspection and Maintenance Plan	Recordkeeping	50

Emissions Unit ID	Applicable Requirements	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
	40 CFR 63.803(d)	41	VOC/VHAP	Cleaning and Washoff Solvent Accounting System	Recordkeeping	50
	40 CFR 63.803(e)	42	VOC/VHAP	Chemical Composition of Cleaning and Washoff Solvents	Recordkeeping	50
	40 CFR 63.803(f)	43	VOC/VHAP	Spray Booth Cleaning	Recordkeeping	50
	40 CFR 63.803(g)	44	VOC/VHAP	Storage Requirements	Recordkeeping	50
	40 CFR 63.803(h)	45	VOC/VHAP	Application Equipment	Recordkeeping	50
	40 CFR 63.803(i)	46	VOC/VHAP	Line Cleaning	Recordkeeping	50
	40 CFR 63.803(j)	47	VOC/VHAP	Gun Cleaning	Recordkeeping	50
	40 CFR 63.803(k)	48	VOC/VHAP	Washoff Operations	Recordkeeping	50
	40 CFR 63.803(l)	49	VOC/VHAP	Formulation Assessment Plan for Finishing Operations	Recordkeeping	50

ASSEMBLY 96, PAINT 96, ASSEMBLY 98, AND PAINT 98

Best Available Control Technology Limits

18. Applicable Requirement: VOC Limits [LRAPA 38-020(1)(A)]

18.a. The VOC contents of the coatings used in emissions units Assembly 96, Paint 96, Assembly 98, and Paint 98 shall not exceed the limits in the following table, calculated as a monthly average.

Table 3. VOC Limits

Coating	VOC Limit ¹ (lbs/gal, less water and exempt compounds)
Pretreatment	6.5
Primer/Primer Surface	2.1
Primer Sealer	3.5
Topcoats	
<i>General</i>	3.5
<i>Metallic/Iridescent</i>	4.3
<i>Multi-Colored</i>	5.7
Multistage System ²	4.5
Multi-Colored Multistage	3.5
Specialty Coating	7.0
Adhesives	
<i>Sidewall Laminating</i>	1.0
<i>Other</i>	3.5

- 1 Touch-up and stencil coatings are exempt from these emission limits.
- 2 The monthly average VOC content of a basecoat/clearcoat multistage system shall be calculated according to the following formula:

$$VOC_{ms} = [VOC_{bc} + 2VOC_{cc}] / 3$$

where:

- VOC_{ms} = combined VOC content of basecoat/clearcoat system
(lb VOC/gal, less water and exempt compounds)
- VOC_{bc} = average VOC content, as applied, of basecoat
(lb VOC/gal, less water and exempt compounds)
- VOC_{cc} = average VOC content, as applied, of clearcoat
(lb VOC/gal, less water and exempt compounds)

- 18.b. The permittee may satisfy the VOC limits in Condition 18.a by using an emission control system consisting of collection and control devices for reducing emissions of VOC. The emission control system(s) shall reduce VOC emissions to a level equivalent to or lower than that which would have been achieved by the uncontrolled utilization of coatings meeting the VOC content limits in Condition 18.a.

19. Monitoring and Recordkeeping Requirement: VOC Limits

- 19.a. The permittee shall track usage of materials within the controlled and uncontrolled paint booths. Compliance with the coating VOC limits shall be determined by mass balance calculations from MSDS information, actual and derived usage records, and corrected for destruction efficiency on treated exhaust streams. The permittee can assume the primary booths are controlled when interlocks are active. If interlocks are inactive, the permittee shall assume uncontrolled emissions until the interlocks are re-engaged.

For MSDSs that have a range of values for VOC content, the permittee shall use formulation data sheets from the manufacturer or MSDSs to provide VOC content information for individual products or separate coating group categories. For formulation data sheets or MSDSs that provide a range of values for volatile percent or VOC content, the highest value shall be used in the VOC determination. In determining the value for each category of coating material, the permittee shall use as the category value the VOC content for the product with the highest VOC content for the products in that category.

- 19.b. The monthly average equivalent VOC content, as applied, for coatings less water and exempt compounds shall be determined for each coating category and calculated as follows:

$$M_{VOCc} = ((W_{S1} - W_{W1} - W_{ES1}) + (W_{S2} - W_{S2} - W_{ES2}) * (1 - DRE)) / (V_M - V_W - V_{ES})$$

where:

- M_{VOCc} = Controlled equivalent VOC content of coating, minus water and exempt solvents (lb-VOC/gal-coating);
- W_{S1} = weight of uncontrolled volatile compounds (lbs);
- W_{W1} = weight of water in uncontrolled materials (lbs);
- W_{ES1} = weight of exempt compounds in uncontrolled materials (lbs);
- W_{S2} = weight of controlled volatile compounds (lbs);
- DRE = destruction and removal efficiency: The product of the capture efficiency and the destruction efficiency; the manufacturer's guaranteed DRE (95% for RTOs, 90% for pre-concentrator/COs) shall be used until completion of the initial control system emission and efficiency testing after which time the permittee shall utilize the DRE derived from the most recent source test (upon submittal of the source test report). The fractional capture efficiency is presumed to be 1.00 for booths interlocked to an RTO or to a pre-concentrator, and zero at times of control device bypass or shutdown and for any period where a booth is not interlocked to the emission control system.
- V_M = volume of coating (gal);
- V_W = volume of water (gal); and
- V_{ES} = volume of exempt compounds.

- 19.c. The permittee shall conduct VOC emissions control system efficiency testing at least once per permit term. For systems with pre-concentrators, the overall system efficiency must be evaluated

in accordance with the ODEQ's *Source Sampling Manual*. For single-stage control systems (RTOs) the efficiency of the oxidizer must be evaluated, also in accordance with the ODEQ's *Source Sampling Manual*. With either type of system, booth collection efficiency can be assumed to be 100%.

19.d. Control Device Operating Temperature Requirements

19.d.i. **Regenerative Thermal Oxidizer (RTO):**

The combustion temperature of oxidizer control devices shall be continuously monitored and recorded during operation. Corrective action shall be taken if, for longer than 10 consecutive minutes the measured temperatures fall more than 5 percent below the combustion chamber set temperature (or 50 degrees Fahrenheit, whichever change is smaller) determined to achieve desired DRE during the most recent source test. Combustion chamber temperature set points shall be established at a temperature equal to the average temperature determined from source tests to result in a control device destruction efficiency of 95 percent, or greater. Operation of the control device when the combustion temperature is lower than the combustion chamber set temperature is not, by itself, a violation of this permit.

19.d.ii. **Rotary Concentrator with Catalytic Oxidizer (RCO):**

19.d.ii.A. The desorption temperature for the rotary concentrator device shall be continuously monitored and recorded during operation. Corrective action shall be taken if, for longer than 10 consecutive minutes the measured temperatures fall more than 20 percent below the set point temperature (or 60 degrees Fahrenheit, whichever change is smaller) determined to achieve desired desorption. Desorption temperature set point shall be established as the average temperature determined from the most recent source test to achieve a capture efficiency for the concentrator of 95%, or greater; overall system DRE of 90%.

19.d.ii.B. The combustion chamber temperature for the Catalytic Oxidizer devices shall be continuously monitored and recorded during operation. Corrective action shall be taken if, for longer than 10 consecutive minutes, the measured temperatures falls more than 25 percent below the combustion chamber inlet set temperature (or 150 degrees Fahrenheit, whichever change is smaller) determined to achieve desired DRE during the most recent source test. Combustion chamber temperature set points shall be established at a temperature equal to the average temperature determined from source tests to result in a control device destruction efficiency for the oxidizer of 95 percent, or greater; overall system DRE of 90%.

19.d.ii.C. Operation of the control device when the desorption temperature or combustion temperature is lower than the respective set temperature is not, by itself, a violation of this permit.

19.e. The permittee shall maintain records of all calculations performed to verify compliance with the VOC limits in Condition 18.

20. Applicable Requirement: Work Practices -- Application Methods [LRAPA 38-020(1)(A)]

20.a. The permittee is not allowed to apply coatings in Assembly 96, Paint 96, Assembly 98, and Paint 98, except by the use of one (1) of the following methods:

20.a.i. Electrostatic coating process;

20.a.ii. High-volume, low-pressure (HVLP) spray gun technology. HVLP is defined as spray gun technology that achieves a 65% or greater transfer efficiency by means of coating application equipment which operates between one-tenth (0.1) and ten (10) pounds per

square inch gauge air pressure measured at the center of the air cap and at the air horns of the spray system;

- 20.a.iii. Such other coating application methods that have been demonstrated to be capable of achieving equivalent or better transfer efficiency than HVLP spray. Equivalency has been demonstrated for the Anest Iwata W200 and the Anest Iwata W100 spray systems. Prior written approval is required from LRAPA before using any other equivalent application method; or
- 20.a.iv. The permittee may use conventional air spray technology only under the following circumstances:
 - 20.a.iv.1. where LRAPA has approved its equivalence to HVLP;
 - 20.a.iv.2. hand-held aerosol canisters or hand-held aerosol-applied coating products;
 - 20.a.iv.3. when emissions from the coating operation are directed to a control device;
 - 20.a.iv.4. when applying waterborne coatings with a VOC content of less than 1.0 lb per gallon;
 - 20.a.iv.5. when coatings being applied utilize hot melt technology, cyanoacrylate or reactive adhesive;
 - 20.a.iv.6. when material being applied emits less than 20 g/L (0.17 lb/gal) of VOC, less water and exempt compounds; or
 - 20.a.iv.7. air brush details in the mural painting operation.

21. Monitoring and Recordkeeping Requirements: Work Practices – Application Methods

- 21.a. To demonstrate that all coating application equipment satisfies the application method requirement, the permittee shall maintain documentation of the maximum inlet air pressure to any spray gun which would result in a maximum of 10 pounds per square inch gauge air pressure measured dynamically at the center of the air cap and the air horns. This information shall be permanently marked on the gun, or maintained in documents on the spray gun manufacturer's letterhead or in the form of technical literature which clearly identifies the spray gun manufacturer, the sales person, or the distributor.

22. Applicable Requirement: Training Plan [LRAPA 38-020(1)(A)]

- 22.a. The permittee shall train all new and existing personnel, including contract personnel, who are involved in the process of motor home exterior or component coating. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The training program shall include, at a minimum, the following:
 - 22.a.i. A list of all current personnel by name and job description that are required to be trained;
 - 22.a.ii. An outline of the subjects to be covered in the initial and annual refresher training for each position or group of personnel;
 - 22.a.iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize material usage and overspray, and appropriate management of cleanup wastes; and
 - 22.a.iv. A description of the methods to be used at the completion of initial or annual refresher training to demonstrate and document successful completion.

23. Monitoring and Recordkeeping Requirement: Training Plan
- 23.a. The permittee shall maintain records demonstrating compliance with the requirement to train personnel.
24. Applicable Requirement: Work Practices – Pollution Prevention [LRAPA 38-020(1)(A)]
- 24.a. The permittee shall use normally closed containers for storing all coatings, fresh and spent solvents, catalysts, thinners, reducers, and solvent-laden cloth or paper used in the process of motor home exterior or component surface preparation and coating.
- 24.b. All organic solvents used for line cleaning or spray gun cleaning in emission units Assembly 96, Paint 96, Assembly 98, and Paint 98 shall be pumped or drained into a normally closed container.
25. Monitoring and Recordkeeping Requirements: Work Practices – Pollution Prevention
- 25.a. The permittee shall use signs in storage, mixing, and cleaning areas and labels on storage, mixing, and waste containers to ensure that VOC-containing materials are properly handled and stored using normally closed containers.

CABINET SHOP 96 AND CABINET SHOP 98

Best Available Control Technology Limits

26. Applicable Requirement: VOC Content Limits [LRAPA 38-020(1)(A)]
- 26.a. The VOC contents of the coatings utilized in emissions units Cabinet Shop 96 and Cabinet Shop 98 shall not exceed the limits in the following table.

Table 4. VOC Content Limits

Coating Type	Allowable VOC Content (lb VOC/lb solids)
1. Waterborne Topcoats, or	0.8
2. Topcoats and Sealers	
<i>Sealers</i>	1.9
<i>Topcoat</i>	1.8
<i>Acid-cured alkyd amino vinyl sealers</i>	2.3
<i>Acid-cured alkyd amino conversion varnish topcoats</i>	2.0

27. Monitoring and Recordkeeping Requirement: VOC Content Limits
- 27.a. The permittee shall monitor compliance with the VOC limits in Condition 26 by using any of the methods below.
- 27.a.i. Once each month, and using the records required per Condition 31. The permittee shall monitor compliance with the VOC limits in Condition 26 by demonstrating that each coating category specified in Condition 26 has a monthly average VOC content less than or equal to the level specified, as applied, less water and exempt compounds.

Certified product data sheets (CPDS) or material safety data sheets (MSDS) shall be used to provide maximum VOC content for each individual coating material. For CPDS

or MSDS that provide a range of values for volatile percent or VOC content, the highest value shall be used in the emission calculation.

The monthly average VOC content as applied, less water and exempt compounds, shall be calculated as follows:

$$M_{\text{VOCWT}} = M_{\text{VOC}} / M_{\text{SOL}}$$

where:

- M_{VOCWT} = weight of VOC in coating, less water and exempt compounds per pound of solids (lb-VOC / lb-solids);
- M_{VOC} = weight fraction of VOC in coating, less water and exempt compounds;
and
- M_{SOL} = weight fraction of solids in coating.

- 27.a.ii. Use only compliant wood furniture coating materials and maintain CPDSs or MSDSs for as-applied materials.

40 CFR 63 Subpart JJ Emission Limits

28. Applicable Requirement: VHAP Limits – Finishing Operations [40 CFR 63.802(b)(1)]

- 28.a. The permittee shall limit VHAP emissions from Cabinet Shop 96 and Cabinet Shop 98 wood furniture finishing operations to achieve a weighted monthly average VHAP content across all coatings of a maximum of 0.8 lb VHAP/lb solids, as applied; or use compliant finishing materials as follows:
 - 28.a.i. 1.0 lb VHAP/lb solids for stains;
 - 28.a.ii. 0.8 lb VHAP/lb solids for washcoats, sealers, topcoats, basecoats, and enamels;
 - 28.a.iii. 10 percent (10%) maximum VHAP by weight for thinners; and
 - 28.a.iv. 3 percent (3%) maximum VHAP by weight for thinners used to formulate washcoats, basecoats, and enamels on-site.

29. Monitoring Requirement: VHAP Limits – Finishing Operations [40 CFR 63.804(d)]

- 29.a. The permittee shall monitor compliance with the VHAP Limits in Condition 28 by using any of the methods presented below:
 - 29.a.i. Calculate the average VHAP content for all wood furniture coating materials used at the facility using Equation 1, and maintain a value of “E” no greater than 0.8 for Cabinet Shop 96 and Cabinet Shop 98;

Equation 1

$$E = (M_{c1}C_{c1} + M_{c2}C_{c2} + \dots + M_{cn}C_{cn} + S_1W_1 + S_2W_2 + \dots + S_nW_n) / (M_{c1} + M_{c2} + \dots + M_{cn})$$

where:

- E = average VHAP content of finishing materials;
- M_{cn} = the mass of solids in finishing material (c) used monthly (lb solids/month);
- C_{cn} = the VHAP content of finishing material (c) in lb VHAP/lb solids;

- S_n = the VHAP content, expressed as a weight fraction, of any thinners added to the finishing materials participating in the averaging equation; and
- W_n = the amount of S_n , in pounds, added to the finishing materials during the monthly averaging period.

- 29.a.ii. Use compliant wood furniture coating materials according to the following criteria:
- 29.a.ii.1. Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied, each stain has a VHAP content of no more than 1.0 lb VHAP/lb solids, as applied, and each thinner contains no more than ten percent (10.0%) VHAP by weight;
- 29.a.ii.2. Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated on-site by thinning another finishing material, has a VHAP content of no more than 0.8 lb VHAP/lb solids, as applied, and each thinner contains no more than ten percent (10.0%) VHAP by weight; and
- 29.a.ii.3. Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 lb VHAP/lb solids and a thinner containing no more than three percent (3%) VHAP by weight.

30. Recordkeeping Requirement: VHAP Limits – Finishing Operations [40 CFR 63.806(b)]

- 30.a. The permittee shall maintain the following specific records related to wood-finishing operations:
- 30.a.i. The permittee shall maintain records of the following: [40 CFR 63.806(b)]
- 30.a.i.1. Certified Product Data Sheet for each finishing material and thinner subject to the emission limits in Condition 28; and
- 30.a.i.2. VHAP content, in pound VHAP/pound solids, as applied, of each finishing material subject to the emission limits in Condition 28.
- 30.b. If the compliance method in Condition 29.a.i is used, the permittee shall maintain copies of the averaging calculation for each month, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of "E" in Equation 1. [40 CFR 63.806(c)]

31. Reporting Requirement: VHAP Limits – Finishing Operations [40 CFR 63.804(g)(1) & (2)]

- 31.a. Within 30 calendar days after the end of each 6-month period, following the initial compliance certification report required by 40 CFR 63.804(f), the permittee shall submit a semi-annual report and compliance certification report that contains the following information (semi-annual reports required for this condition can be submitted with the semi-annual and annual Title V reports):
- 31.a.i. If using the procedures of Condition 29.a.i (averaging) for demonstrating compliance with Condition 28 (limits), the permittee shall state that the value of "E", as calculated by Equation 1, is no greater than the limits in Condition 28. A violation of the standard occurs if "E" is greater than 0.8 for any month. A violation of the monthly average is a separate violation of the standard for each day of operation during the month, unless the permittee can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
- 31.a.ii. If using the procedures of Condition 29.a.ii (compliant coatings) for demonstrating compliance with Condition 28 (limits) the permittee shall state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semi-annual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. A violation of the standard occurs

whenever a noncompliant material, as demonstrated by records or by a sample of the coating, is used.

32. Applicable Requirement: VHAP Limits – Contact Adhesives [40 CFR 63.802(b)(2)]
- 32.a. The permittee shall limit Cabinet Shop 96 and Cabinet Shop 98 VHAP emissions from contact adhesives used in the manufacture of wood furniture or wood furniture components by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives applied from a hand-held container and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 lb VHAP/lb solids, as applied, using the compliance methods in Condition 33.
33. Monitoring and Recordkeeping Requirement: VHAP Limits – Contact Adhesives [40 CFR 63.804(e)(1)] [40 CFR 63.806(b)]
- 33.a. The permittee shall monitor compliance with the VHAP limits for contact adhesives used in Cabinet Shop 96 and Cabinet Shop 98 by using compliant contact adhesives with a VHAP content no greater than 0.2 lb VHAP/lb solids, as applied.
- 33.b. The permittee shall maintain the following specific records related to wood-finishing operations in accordance with 40 CFR 63.806:
- 33.b.i. Certified Product Data Sheet for each contact adhesive subject to the emission limits in Condition 32;
- 33.b.ii. VHAP content, in pound VHAP/pound solids, as applied, of each contact adhesive subject to the emission limits in Condition 32.
34. Reporting Requirement: VHAP Limits – Contact Adhesives [40 CFR 63.804(g)(5)]
- 34.a. Within 30 calendar days after the end of each 6-month period, following the initial compliance certification report required by 40 CFR 63.804(f), the permittee shall submit a semi-annual report and compliance certification report that contains the following information (semi-annual reports required for this condition can be submitted with the semi-annual and annual Title V reports):
- 34.a.i. If using the procedures of Condition 33 for demonstrating compliance with Condition 32, the permittee shall state that compliant contact and/or foam adhesives have been used each day in the semi-annual reporting period, or should otherwise identify each day noncompliant contact and/or foam adhesives were used. Each day a noncompliant contact or foam adhesive is used is a single violation of the standard.
35. Applicable Requirement: VOC Limits – Strippable Spray Booth Coatings [40 CFR 63.802(b)(3)]
- 35.a. The permittee shall limit HAP emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids, as applied.
36. Monitoring and Recordkeeping Requirement: VOC Limits – Strippable Spray Booth Coatings [40 CFR 63.806(b)]
- 36.a. The permittee shall maintain the following specific records related to wood-finishing operations:
- 36.a.i. Certified Product Data Sheet for each strippable spray booth coating subject to the emission limits in Condition 35; and
- 36.a.ii. The VOC content in pound VOC/pound solids, as applied, of each strippable booth coating subject to the emission limits in Condition 35.
37. Reporting Requirement: VOC Limits – Strippable Spray Booth Coatings [40 CFR 63.804(g)(7)]
- 37.a. Within 30 calendar days after the end of each 6-month period, following the initial compliance certification report required by 40 CFR 63.804(f), the permittee shall submit a semi-annual report and compliance certification report that contains the following information (semi-annual reports required for this condition can be submitted with the semi-annual and annual Title V reports):

- 37.a.i. For demonstrating compliance with Condition 35, the permittee shall state that compliant strippable spray booth coatings have been used each day in the semi-annual reporting period, or should otherwise identify each day noncompliant strippable spray booth coatings were used. Each day a noncompliant strippable spray booth coating is used is a single violation of the standard.

40 CFR 63 Subpart JJ Work Practice Standards

38. **Applicable Requirement:** Work Practice Implementation Plan [40 CFR 63.803(a)]

- 38.a. The permittee shall maintain a written Work Practice Implementation Plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in Conditions 39 through 49. The written Work Practice Implementation Plan shall be available for inspection by a LRAPA/EPA Administrator upon request. If the LRAPA/EPA Administrator determines that the Work Practice Implementation Plan does not adequately address each of the topics specified in Conditions 39 through 49 or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, the LRAPA/EPA Administrator may require the permittee to modify the plan. Revisions or modifications to the plan do not require a revision of this permit.

39. **Applicable Requirement:** Operator Training Course [40 CFR 63.803(b)]

- 39.a. The permittee shall train all new and existing personnel, including contract personnel, who are involved in finishing, gluing, cleaning, and washoff operations, use of manufacturing equipment, or implementation of the wood finishing MACT requirements of this permit. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the Work Practice Implementation Plan. The training program shall include, at a minimum, the following:

- 39.a.i. A list of all current personnel by name and job description that are required to be trained;
- 39.a.ii. An outline of the subjects to be covered in the initial and annual refresher training for each position or group of personnel;
- 39.a.iii. Lesson plans for courses to be given at the initial and the annual refresher training that include, at a minimum, appropriate application techniques, appropriate cleaning and washoff procedures, appropriate equipment setup and adjustment to minimize finishing material usage and overspray, and appropriate management of cleanup wastes; and
- 39.a.iv. A description of the methods to be used at the completion of initial or annual refresher training to demonstrate and document successful completion.

40. **Applicable Requirement:** Inspection and Maintenance Plan [40 CFR 63.803(c)]

- 40.a. The permittee shall prepare and maintain with the Work Practice Implementation Plan a written leak Inspection and Maintenance Plan that specifies:
- 40.a.i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- 40.a.ii. An inspection schedule;
- 40.a.iii. Methods for documenting the date and results of each inspection and any repairs that were made;
- 40.a.iv. The time frame between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule:
- 40.a.iv.1. A first attempt at repair (e.g., tightening of packing glands) shall be made no later than five (5) calendar days after the leak is detected; and

40.a.iv.2. Final repairs shall be made within 15 calendar days after the leak is detected, unless the leaking equipment is to be replaced by a new purchase, in which case repairs shall be completed within three (3) months.

41. Applicable Requirement: Cleaning and Washoff Solvent Accounting System [40 CFR 63.803(d)]
- 41.a. The permittee shall develop an organic HAP solvent accounting form to record:
- 41.a.i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801;
- 41.a.ii. The number of pieces washed off each month and the reason for the washoff; and
- 41.a.iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month and whether it is recycled on-site or disposed off-site.
42. Applicable Requirement: Chemical Composition of Cleaning and Washoff Solvents [40 CFR 63.803(e)]
- 42.a. The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Attachment II (Table 4 from the Wood Furniture Manufacturing NESHAP) in concentrations subject to MSDS reporting as required by OSHA.
43. Applicable Requirement: Spray Booth Cleaning [40 CFR 63.803(f)]
- 43.a. The permittee shall not use compounds containing more than 8.0 percent by weight of VOC for cleaning spray booth components other than conveyors, continuous coaters and their enclosures, or metal filters, unless the spray booth is being refurbished. If the spray booth is being refurbished, that is the spray booth coating or other protective material used to cover the booth is being replaced, the permittee shall use no more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating.
44. Applicable Requirement: Storage Requirements [40 CFR 63.803(g)]
- 44.a. The permittee shall use normally-closed containers for storing finishing, gluing, cleaning, and washoff materials.
45. Applicable Requirement: Application Equipment Requirements [40 CFR 63.803(h)]
- 45.a. The permittee shall use conventional air spray guns to apply finishing materials only under the following circumstances:
- 45.a.i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
- 45.a.ii. For touchup and repair under the following conditions:
- 45.a.ii.1. The touchup and repair occurs after completion of the finishing operation; or
- 45.a.ii.2. The touchup and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touchup and repair are applied from a container that has a volume of no more than 2.0 gallons.
- 45.a.ii.3. When spray is automated, that is, the spray gun is aimed and triggered automatically, not manually;
- 45.a.ii.4. When emissions from the finishing application station are directed to a control device;
- 45.a.ii.5. The conventional air spray gun is used to apply finishing materials and the cumulative total usage of that finishing material applied by conventional air spray guns is no more than 5.0 percent of the total gallons of finishing material used during that semi-annual period; or

- 45.a.ii.6. The conventional air spray gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to the LRAPA/EPA Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
 - 45.a.ii.6.A. The production speed is too high or the part shape is too complex for one (1) operator to coat the part and the application station is not large enough to accommodate an additional operator; or
 - 45.a.ii.6.B. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain.

- 46. Applicable Requirement: Line Cleaning [40 CFR 63.803(i)]
 - 46.a. The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container.

- 47. Applicable Requirement: Gun Cleaning [40 CFR 63.803(j)]
 - 47.a. The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container.

- 48. Applicable Requirement: Washoff Operations [40 CFR 63.803(k)]
 - 48.a. The permittee shall control emissions from washoff operations by:
 - 48.a.i. Using normally-closed tanks for washoff; and
 - 48.a.ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.

- 49. Applicable Requirement: Formulation Assessment Plan for Finishing Operations [40 CFR 63.803(l)]
 - 49.a. The permittee shall prepare, and maintain with the Work Practice Implementation Plan, a Formulation Assessment Plan that:
 - 49.a.i. Identifies all VHAPs from the list presented in Attachment III (Table 5 from the Wood Furniture Manufacturing NESHP) that are being used in finishing operations by the affected source;
 - 49.a.ii. Establishes a baseline level of usage by the affected source, for each VHAP identified in Paragraph (i) of this condition. The baseline usage level shall be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in Paragraph (i) of this condition. For formaldehyde, the baseline level of usage shall be based on the amount of free formaldehyde present in the finishing material when it is applied. For styrene, the baseline level of usage shall be an estimate of unreacted styrene, which shall be calculated by multiplying the amount of styrene monomer in the finishing material, when it is applied, by a factor of 0.16.
 - 49.a.iii. Tracks the annual usage of each VHAP identified in Paragraph (i) of this condition by the affected source that is present in amounts subject to MSDS reporting as required by OSHA.
 - 49.b. If the annual usage of the VHAP identified in Condition 49.a.i exceeds its baseline level, then the permittee shall provide a written notification to LRAPA that describes the amount of the increase and explains the reasons for exceedance of the baseline level. The following explanations would relieve the owner or operator from further action, unless the affected source is not in compliance with any LRAPA regulations or requirements for that VHAP: [40 CFR 63.803(l)(4)]

- 49.b.i. The exceedance is no more than 15.0 percent (15%) above the baseline level;
 - 49.b.ii. Usage of the VHAP is below the *de minimis* level presented in Attachment III (Table 5 from the Wood Furniture Manufacturing NESHAP) for that VHAP;
 - 49.b.iii. The permittee is in compliance with all applicable State and LRAPA air toxic regulations or guidelines for the VHAP; or
 - 49.b.iv. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
 - 49.b.v. If none of the explanations listed above are the reason for the increase, the owner or operator shall confer with LRAPA to discuss the reason for the increase and whether there are practical and reasonable technology-based solutions for reducing the usage. The evaluation of whether a technology is reasonable and practical shall be based on cost, quality, and marketability of the product, whether the technology is being used successfully by other wood furniture manufacturing operations, or other criteria mutually agreed upon by LRAPA and the permittee. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress. [40 CFR 63.803(1)(5)]
 - 49.c. If the permittee uses a VHAP of potential concern listed in Attachment IV (Table 6 from the Wood Furniture Manufacturing NESHAP) for which a baseline level has not been previously established, then the baseline level shall be established as the *de minimis* level provided in that same table for that chemical. The permittee shall track the annual usage of each VHAP of potential concern identified in this paragraph that is subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the *de minimis* level listed in Attachment IV (Table 6 from the Wood Furniture Manufacturing NESHAP) for that chemical, then the permittee shall provide an explanation to LRAPA that documents the reason for exceedance of the *de minimis* level. If the explanation is not one of those listed above, the permittee shall follow the procedures established in the preceding paragraph. [40 CFR 63.803(1)(6)]
50. Monitoring and Recordkeeping Requirements: Work Practice Standards [40 CFR 63.806]
- 50.a. The permittee shall maintain on-site the Work Practice Implementation Plan required by Condition 38 and all records associated with fulfilling the requirements of that plan, including but not limited to: [40 CFR 63.806(e)]
 - 50.a.i. Records demonstrating that the operator training program is in place;
 - 50.a.ii. Records collected in accordance with the Inspection and Maintenance Plan;
 - 50.a.iii. Records associated with the cleaning solvent accounting system required by Condition 41;
 - 50.a.iv. Records associated with the limitation on the use of conventional air spray guns showing total finishing material usage and the percentage of finishing materials applied with conventional air spray guns for each semi-annual period as required by Condition 45;
 - 50.a.v. Records associated with the Formulation Assessment Plan required by Condition 49; and
 - 50.a.vi. Copies of documentation such as logs developed to demonstrate that the other provisions of the Work Practice Implementation Plan are followed.
 - 50.b. The permittee shall maintain records of the compliance certifications submitted in accordance with Conditions 51 and 53 for each semi-annual period. [40 CFR 63.806(h)]
 - 50.c. The permittee shall maintain records of all other information submitted with the compliance status report and the semi-annual reports required by Conditions 51 and 53. [40 CFR 63.806(i)]

51. Reporting Requirements: Work Practice Standards [40 CFR 63.804(g)(8)]

- 51.a. Within 30 calendar days after the end of each 6-month period, following the initial compliance certification report required by 40 CFR 63.804(f), the permittee shall submit a semi-annual report and compliance certification report that contains the following information (semi-annual reports required for this condition can be submitted with the semi-annual and annual Title V reports):
- 51.a.i. For demonstrating compliance with Condition 38, the permittee shall state that the Work Practice Implementation Plan is being followed, or should otherwise identify the provisions of the plan that have not been implemented and each day the provisions were not implemented. During any period of time that the permittee is required to implement the provisions of the plan, each failure to implement an obligation under the plan during any particular day is a violation. [40 CFR 63.804(g)(8)]
- 51.a.ii. If the written notification under Condition 49 is required, the permittee shall include in the notification one (1) or more statements that explains the reasons for the usage increase. The notification shall be submitted with the annual report required by Condition 70 for the annual period in which the usage increase occurred. [40 CFR 63.807(e)]

40 CFR 63 Subpart JJ Testing Requirements

52. Testing Requirements: [40 CFR 63 Subpart JJ]

- 52.a. The permittee shall perform, or have performed by an outside laboratory, the following test methods and procedures: [40 CFR 63.805(a)]
- 52.a.i. EPA Method 311 of Appendix A of 40 CFR Part 63 shall be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data shall be used to identify VHAPs present in the coating. EPA Method 311 shall then be used to quantify those VHAPs identified through formulation data. EPA Method 311 shall not be used to quantify HAPs such as styrene and formaldehyde that are emitted during the cure.
- 52.a.ii. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings.
- 52.a.iii. If it is demonstrated to the satisfaction of the LRAPA/EPA Administrator that a coating does not release VOC or HAP byproducts during the cure. For example, if all VOC and HAP present in the coating is solvent, then batch formulation data (e.g., CPDS) shall be accepted.
- 52.a.iv. The permittee may request approval from the LRAPA/EPA Administrator to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between EPA Method 24 or Method 311 test data and a facility's formulation data, that is, if the EPA Method 24/311 value is higher, the EPA Method 24/311 test shall govern unless, after consultation, the permittee can demonstrate to the satisfaction of the LRAPA/EPA Administrator that the formulation data were correct.
- 52.a.v. Sampling procedures shall follow the guidelines presented in "Standard Procedures for Collection of Coating and Ink Samples for VOC Content Analysis by Reference Method 24 and Reference Method 24A."

40 CFR 63 Subpart JJ General Reporting

53. The permittee shall fulfill all reporting requirements of 40 CFR 63.7 through 63.10 according to the applicability criteria in 40 CFR 63.800(d).

54. The frequency of the reports shall not be reduced from semi-annually regardless of the history of the owner's or operator's compliance status. [40 CFR 63.807(c)(4)]
55. Addresses of regulatory agencies are the following, unless otherwise instructed:

Lane Regional Air Protection Agency

1010 Main Street
Springfield, OR 97477
(541) 736-1056

Oregon DEQ - Air Quality Division

811 SW Sixth Avenue
Portland, OR 97204
(503) 229-5359

US Environmental Protection Agency

Region 10, Office of Air, Waste and Toxics
1200 Sixth Avenue - OAQ-107
Seattle, WA 98101
(206) 553-4273

Insignificant Activities Emission Limits and Standards

56. LRAPA acknowledges that insignificant emission units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions [OAR 340-200-0020] exist at facilities required to obtain a Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to insignificant activities are incorporated as follows:

Applicable Requirements	Condition Number	Pollutant/Parameter	Limit/Standard
32-010	57.a	Visible Emissions	20% opacity
32-015	57.b	PM/PM ₁₀	0.1 gr/dscf
32-030	57.c	PM/PM ₁₀	0.1 gr/dscf

57. Applicable Requirements: Opacity, Particulate Emissions, and Particulate Emissions (Combustion Sources)

57.a. The permittee shall not cause or allow the emission of any air contaminant into the atmosphere for a period aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than twenty percent (20%) opacity, excluding uncombined water vapor. [LRAPA 32-010(1)(B) & (3)]

57.b. The permittee shall not cause or allow the emission of PM to exceed 0.1 grains per dry standard cubic foot for any air contaminant source. [LRAPA 32-015(2)]

57.c. The permittee shall not cause or allow the emission of PM from any new combustion source (sources installed, constructed, or modified after June 1, 1970) in excess of 0.1 grains per dry standard cubic foot. [LRAPA 32-030]

58. Testing, Monitoring, and Recordkeeping Requirements: Opacity, Particulate Emissions, Particulate Emissions (Combustion Sources)

58.a. Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emission limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of "opacity" and "particulate matter" in OAR 340-208-0010 and perform the testing in accordance with the ODEQ *Source Sampling Manual*.

PLANT SITE EMISSION LIMITS

59. The short-term plant site emissions shall not exceed the following: [LRAPA 34-060 (4 and 5)]

Emission Unit ID	Pollutant	Short-Term PSEL	Units	Monitoring Requirements	
				Method	Permit Condition
Paint 96 Assembly 96 Cabinet Shop 96 Paint 98 Assembly 98 Cabinet Shop 98	PM	4,315	lb/month	Recordkeeping	61
	PM10	4,315	lb/month	Recordkeeping	61
	VOC	99,470	lb/month	Recordkeeping	61
	CO	2,140	lb/month	Recordkeeping	61
	NO _x	9,000	lb/month	Recordkeeping	61

60. The annual plant site emissions shall not exceed the following: [LRAPA 34-060 (4 and 5)]

Pollutant	PSEL (tons/yr)	Monitoring Requirements	
		Method	Permit Condition
PM	14.3	Recordkeeping	61
PM10	14.3	Recordkeeping	61
CO	10.2	Recordkeeping	61
NOX	11.9	Recordkeeping	61
SO2	NA	NA	NA
VOC	212*	Recordkeeping	61

* Annual VOC limit is twelve-month total based on a monthly rolling sum.

61. Plant Site Emission Limit (PSEL) Monitoring:

61.a. The permittee shall determine compliance with the PSELs by conducting monitoring in accordance with the following procedures, test methods and frequencies:

61.a.i. For coatings operations in emissions units Cabinet Shop 96, Cabinet Shop 98, Assembly 96, Assembly 98, Paint 96 and Paint 98 that are not ducted to emission control systems, the permittee shall calculate the monthly and twelve-month total, monthly rolling emissions using the records maintained pursuant to Condition 65.a and the following equation:

$$E_{uc} = (\sum (RM_i \times D_i \times VOC_i) \times k) - HW$$

where:

- E_{uc} = VOC emissions in lbs/mo or tons/yr for activities not ducted to a VOC control system;
- RM_i = amount of each type of raw material used in gals/mo and gals/yr;
- D_i = density of each raw material in lbs/gal (from MSDS or CPDS)
- VOC_i = VOC content of raw material (weight fraction from MSDS or CPDS);
- k = conversion constant (1 lb/lb, 1 ton/2000 lbs); and
- HW = amount of VOC in waste disposed offsite in lbs/mo or tons/yr.

NOTE: Certified product data sheets (CPDS) or material safety data sheets (MSDS) shall be used to provide maximum VOC content for each individual coating material. For CPDS or MSDS that provide a range of values for volatile percent or VOC content, the highest value shall be used in the emission calculation. For materials that fall under 40 CFR 63 Subpart JJ, the VOC content used in the calculations should be the maximum aggregate emissions potential of the finishing material, adhesive, or solvent.

61.a.ii. For coatings operations in emissions units Assembly 96, Assembly 98, Paint 96, and Paint 98 for which the BACT limits of Condition 18 are satisfied using a control device, the permittee shall calculate the monthly and 12-month rolling total emissions using the records maintained pursuant to Condition 65.e. and the following equation:

$$E_c = ((\sum [(RM_i \times D_i \times VOC_i) - HW]) \times (1 - (CE \times DRE^*))) \times k$$

where:

- E_c = VOC emissions from activities conducted in booths ducted to a control device in lbs/mo or tons/yr;
- RM_i = amount of each type of raw material used in gals/mo and gals/yr;
- D_i = density of each raw material in lbs/gal (from MSDS or CPDS)
- VOC_i = VOC content of raw material (weight fraction from MSDS or CPDS);
- k = conversion constant (1 lb/lb, 1 ton/2000 lbs); and
- HW = amount of VOC in waste disposed offsite in lbs/mo or tons/yr.
- CE = pollutant capture efficiency expressed as a decimal (CE presumed to be 1.00 for booths interlocked to a control device)
- DRE = destruction and removal efficiency: The product of the capture efficiency and the destruction efficiency; the manufacturer's guaranteed DRE (95% for RTOs, 90% for preconcentrator/COs) shall be used until completion of the initial control system emission and efficiency testing after which time the permittee shall utilize the DRE derived from the most recent source test (upon submittal of the source test report). The fractional capture

efficiency is presumed to be 1.00 for booths interlocked to an RTO or to a preconcentrator, and zero at times of control device bypass or shutdown and for any period where a booth is not interlocked to the emission control system.

61.a.iii. The permittee shall calculate annual PM, PM₁₀, CO, NO_x, and VOC emissions for emission unit CU using the records maintained pursuant to Condition 65.e and the following equation and emission factors:

$$E = P \times EF_{NG} \times k$$

where:

- E = pollutant emissions (PM, PM₁₀, CO, NO_x, and VOC)-ton/yr;
- P = quantity of natural gas consumed in MMcf/yr;
- EF_{NG} = natural gas emission factors stated below; and
- k = conversion constant (1 lb/lb, 1 ton/2000 lbs).

Pollutant	Emission Factor (lb/MMcf)	Source
PM	7.6	AP-42
PM ₁₀	7.6	AP-42
NO _x	100	AP-42
CO	84	AP-42
VOC	5.5	AP-42

61.a.iv. The permittee shall calculate facility-wide monthly and annual VOC emissions using the records maintained pursuant to Condition 65.a and 65.e using the following equation:

$$E_{Total} = E_{uc} + E_C + E_{com}$$

where:

- E_{Total} = VOC total for comparison to the facility PSEL;
- E_{uc} = Uncontrolled emissions as calculated in Condition 61.a.i;
- E_C = Controlled emissions as calculated in Condition 61.a.ii; and
- E_{Com} = Combustion VOC emissions as calculated in Condition 61.a.iii.

- 61.a.v. The permittee shall calculate the monthly and annual PM and PM₁₀ emissions using the records maintained pursuant to Condition 65.b and the following equation:

$$E = W_{PM} \times (1-CE) \times F \times k$$

where:

- E = PM and PM₁₀ emissions in lbs/mo or tons/yr;
F = fraction coefficient (1 for PM and 0.5 for PM₁₀);
W_{PM} = quantity of particulate collected by control equipment in lbs/mo and tons/yr;
k = conversion constant (1 lb/lb, 1 ton/2000 lbs); and
CE = Control efficiency of the control device
- 98% for Cabinet Shop 96 baghouses,
 - 98% for Cabinet Shop 98 baghouses.

- 61.a.vi. The permittee shall calculate the monthly and annual welding PM and PM₁₀ emissions using the records maintained pursuant to Condition 65.c and the following equation:

$$E = WR \times EF_{WR} \times k$$

where:

- E = PM and PM₁₀ emissions in lbs/mo or tons/yr;
WR = quantity of welding rod consumed in tons/mo and tons/yr;
EF_{WR} = welding rod emission factor of 8.19 lbs/ton welding rod; and
k = conversion constant (1 lb/lb, 1 ton/2000 lbs).

- 61.a.vii. The emission factors referred to in Condition 61 are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs shall only be determined by the calculations contained in this permit using the measured process parameters recorded during the reporting period.

GENERAL TESTING REQUIREMENTS [LRAPA 34-070 and OAR 340-218-0050(3)(a)]

62. Unless otherwise specified in this permit or approved by LRAPA, the permittee shall conduct all testing in accordance with the ODEQ's *Source Sampling Manual*.
- 62.a. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source-testing personnel, equipment vendors, or consultants, may render the source test invalid.
- 62.b. Unless otherwise specified by a permit condition, all compliance source tests shall be performed at 90 to 110% of the normal maximum operating rate. For the purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the operating rates during a 12-month period immediately preceding the source test.
- 62.c. Each source test shall consist of at least three (3) test runs and the emissions results shall be reported as the arithmetic average of all valid test runs. There must be at least two (2) valid test runs for a source test to be accepted.
63. Although source testing is not required by this permit for the permit conditions listed below, if source testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods and averaging times to measure the pollutant emissions.

Permit Condition	Test Method	Averaging Time	Special Conditions
57	EPA Method 9	Aggregate of three (3) minutes in any 60-minute period	The test duration may be less than 60 minutes if a violation of the standard is documented before the full 60-minute observation period is completed.
57.a, 57.b	ODEQ Methods 5, 7, or 8	Average of three (3) 1-hour test runs	<u>ODEQ Method 8</u> is for sources with exhaust gases at essentially ambient conditions (e.g., material handling cyclones); <u>ODEQ Method 7</u> is for direct contact combustion sources (e.g., particle and veneer dryers); <u>ODEQ Method 5</u> is for indirect contact fuel burning equipment (e.g., boilers) and any other source.

GENERAL RECORDKEEPING REQUIREMENTS [OAR 340-218-0050(3)(b)]

64. As applicable, the permittee shall maintain the following general records of all testing and monitoring required by this permit:
 - 64.a. date, place, and time of sampling or measurements;
 - 64.b. date(s) analyses were performed;
 - 64.c. company or entity that performed the analyses;
 - 64.d. analytical techniques or methods used;
 - 64.e. results of such analyses; and
 - 64.f. operating conditions as existing at the time of sampling or measurement.

65. The permittee shall maintain the following specific records of required monitoring information:
 - 65.a. Monthly and annual usage records of all VOC-containing materials (gallons) and the VOC content of the materials (percent by weight) less water and exempt compounds;
 - 65.b. Total VOC emissions and total rolling 12-month VOC emissions for each month (pounds per month and tons per 12-month period);
 - 65.c. Monthly and annual wood waste collected by the Cabinet Shop 96 and Cabinet Shop 98 control equipment (pounds per month and tons per year);
 - 65.d. Monthly and annual usage of welding rods (pounds);
 - 65.e. Monthly and annual PM and PM10 emissions (pounds per month, tons per year);
 - 65.f. Annual natural gas consumption (MMcf per month and MMcf per year);
 - 65.g. Visible emissions observation and corrective action logs;
 - 65.h. Nuisance complaint and corrective action log; and
 - 65.i. Excess emissions log.

66. The permittee shall maintain the following records for all materials used in emissions units Cabinet Shop 96, Cabinet Shop 98, Assembly 96, Assembly 98, Paint 96, and Paint 98:
 - 66.a. Current list of coatings in use during each reporting period that includes, at a minimum, the name of each material used, the emission unit where each material is used, mix ratio of components used, and current CPDS (when available) or MSDS showing VOC and VHAP contents of coatings as applied; and
 - 66.b. Type and amount of solvent used for cleanup and surface preparation.

67. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring, sample collection, measurement, report, or application. Support information includes copies of all reports required by the permit.

68. Unless otherwise specified by permit condition, the permittee shall make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) shall not be considered a permit deviation provided the amount of data lost does not exceed 10% of the total operating hours in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a record is missing, the permittee shall document the reason for the missing record. In addition, any missing record that can be recovered from other available information shall not be considered a missing record.

GENERAL REPORTING REQUIREMENTS [OAR 340-028-2130(3)(c) and OAR 340-028-2160]

- 69. The permittee shall submit three (3) copies of the semi-annual monitoring report, covering the period from January 1 to June 30, using LRAPA-approved forms, by August 15, unless otherwise approved in writing by LRAPA. Two (2) copies of the report shall be submitted to LRAPA and one (1) copy to the EPA. The semi-annual monitoring report shall include the semi-annual compliance certification.
- 70. The permittee shall submit three (3) copies of the annual monitoring report, using LRAPA-approved forms, covering the period January 1 to December 31, by March 15 of the following year. Two (2) copies of the report shall be submitted to LRAPA and one (1) copy to the EPA.
- 71. The annual monitoring report shall consist of:
 - 71.a. Emission fee report;
 - 71.b. Records as identified in Conditions 65.b and 65.f;
 - 71.c. Semi-annual compliance certification covering the period from July 1 to December 31. [OAR 340-218-0080]

Reporting and Notification Summary

- 72. All written reports or notifications shall be signed by the responsible official. [OAR 340-218-0080(2)]

Report or Notification	Basis for Report	Permit Condition	Reports or Notifications Due	Report or Notification Contents
Semi-annual Compliance Certification Report	40 CFR 63.807(c)	31, 34, 37, and 51	August 15th, March 15th	Records and compliance certifications as specified in 40 CFR 63.804(g)(1), (2), (5), (7), and (8). Reports can be submitted with TV semi-annual reports for the same period as allowed by 40 CFR 63.10(a)(5).
Title V Semi-annual Monitoring Report	OAR 340-218-0050(3)(c)	69	August 15th	Semi-annual compliance certification for January 1 through June 30.
Title V Annual Monitoring Report	OAR 340-218-0050(3)(c)	70 and 71	March 15th	Semi-annual compliance certification for July 1 through December 31. Emissions Fee Report, and Records listed in Conditions 65 and 66.
Nuisance Notification	LRAPA 50-020 & 32-055	8	10 days after receipt of unresolved complaint	Notify by telephone or in writing of unresolved complaint.
Excess Emissions Report	LRAPA 36-001 through 36-030	G7	Report immediately (within 1 hour) of unplanned excess emissions	Follow procedures in Condition G7

Report or Notification	Basis for Report	Permit Condition	Reports or Notifications Due	Report or Notification Contents
			Notify of planned excess emissions 72 hours before activity	
Off-Permit and 502(b)(10) Changes	OAR 340-218-0040(2) & (3)	G15 and G16	Per occurrence	Follow procedures in Conditions G15 and G16.
Permit Deviations Report	OAR 340-218-0050(3)(c)(B)	G8	Within 7 days of permit deviation	Report by telephone.
Formulation Assessment Plan Increase Notification	40 CFR 63.807(e)	51	March 15, if required	Written notification in accordance with 63.803(l)(4). Can be submitted with TV annual report.

NON-APPLICABLE REQUIREMENTS

73. LRAPA, state and federal air quality rules currently determined not applicable to the permittee are listed below. [OAR 340-218-0110]

73.a. The following rules are not applicable because they are standards and procedural requirements for DEQ and LRAPA:

- LRAPA Title 50, Rule 005
- LRAPA Title 50, Rule 010
- LRAPA Title 50, Rule 015.1
- LRAPA Title 50, Rule 025
- LRAPA Title 50, Rule 030
- LRAPA Title 50, Rule 035
- LRAPA Title 50, Rule 040
- LRAPA Title 50, Rule 045

73.b. The following rules are not applicable because the pollutant addressed is not emitted by the facility:

- LRAPA Title 50, Rule 015.2

73.c. The following rules are not applicable because the facility is not in this source category:

- OAR 340-212-0210
- OAR 340-212-0220
- OAR 340-212-0230
- OAR 340-212-0250
- OAR 340-212-0260
- OAR 340-212-0270
- OAR 340-218-0090
- OAR 340-218-0100
- OAR 340 Division 256 -- All
- LRAPA Title 34, Rule 090
- LRAPA Title 34, Rule 100
- LRAPA Title 34, Rule 110
- LRAPA Title 34, Rule 120

LRAPA Title 34, Rule 130
LRAPA Title 34, Rule 140
LRAPA Title 38, Rule 025
LRAPA Title 46, Rule 535
LRAPA Title 46, Rule 550-735
LRAPA Title 46, Rule 800
LRAPA Title 46, Rule 805
LRAPA Title 37, All rules except 150.4.A and 150.4.Z.

73.d. The following rules are not applicable because the indicated procedural requirements have not been triggered:

LRAPA Title 49, Rule 020
LRAPA Title 49, Rule 030
LRAPA Title 38, Rule 015
LRAPA Title 38, Rule 030
LRAPA Title 38, Rule 045

73.e. The following rules are not applicable because the method/procedure is not used by the facility:

OAR 340-220-0160
OAR 340-220-0170
LRAPA Title 34, Rule 060(8)
LRAPA Title 34, Rule 060(9)

73.f. The following rules are not applicable because the facility does not have the regulated emissions unit:

LRAPA Title 32, Rule 020
LRAPA Title 32, Rule 030
LRAPA Title 32, Rule 060
LRAPA Title 32, Rule 065
LRAPA Title 32, Rule 070
LRAPA Title 32, Rule 075
LRAPA Title 33, Rule 045
LRAPA Title 33, Rule 060
LRAPA Title 33, Rule 065
LRAPA Title 33, Rule 070
LRAPA Title 33, Rule 075
LRAPA Title 33, Rule 080

74. Federal applicable requirements currently determined not applicable to the permittee are listed below:

40 CFR Parts: 55, 57, 60 (except subparts A, B and appendices), 61 (except subpart A and M and appendices), 63 (except subpart A, B, JJ, WWWW, and PPPP), 72, 73, 75, 76, 77, 78, 82 (except subpart F), and 85 through 89;
Section 129 of the FCAA (Solid Waste);
Section 183(e) of the FCAA (Consumer and commercial products); and
Section 183(f) of the FCAA (Tank Vessels).

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

G2. Reference Materials

Where referenced in this permit, the version of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. *Source Sampling Manual*; January 23, 1992 -- State Implementation Plan Volume 3, Appendix A4;
- b. *Continuous Monitoring Manual*; January 23, 1992 -- State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee shall comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G4. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G5. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(d), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit shall contain certification by a responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee shall promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G6. Open Burning [LRAPA Title 47]

The permittee is prohibited from conducting open burning, except as may be allowed. [LRAPA 47-001 through 47-030]

G7. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0210 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee shall comply with OAR 340-248-0210 through 340-248-0280, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G8. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G9. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. Such applicable requirements are included and are specifically identified in the permit, or
 - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit shall alter or affect the following:
 - i. Provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. Liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. Applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or
 - iv. Ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

G10. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, and upon meeting all of the permittee's facility safety requirements, the permittee shall allow LRAPA, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where a LRAPA Title V operating permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or LRAPA rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G11. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee shall pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any Class I or Class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under Section 112(r) of the Federal Clean Air Act. The permittee shall submit payment to Lane Regional Air Protection Agency, 1010 Main Street, Springfield, Oregon, 97477, within 30 days of the date LRAPA mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes shall be submitted in writing to LRAPA. Payment shall be made regardless of the dispute. User-based fees shall be charged for

specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G12. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee shall monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and
 - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), shall be submitted to LRAPA and the EPA.
- c. The permittee shall keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G9 shall not extend to Off-Permit changes.

G13. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee shall monitor for, and record, any Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
 - i. Violate an applicable requirement;
 - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. Be a Title I modification.
- b. A minimum 7-day advance notification shall be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G9 shall not extend to Section 502(b)(10) changes.

G14. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit shall be requested and granted in accordance with OAR 340-218-0150. The permittee shall promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. Sale or exchange of the activity or facility.

G15. Minor Permit Modification [OAR 340-218-0170]

The permittee shall submit an application for a Minor Permit Modification in accordance with OAR 340-218-0170.

G16. Significant Permit Modification [OAR 340-218-0180]

The permittee shall submit an application for a Significant Permit Modification in accordance with OAR 340-218-0180.

G17. Staying Permit Conditions [OAR 340-218-0050(6)(e)]

Notwithstanding Conditions G14 and G15, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G18. Construction/Operation Modification [OAR 340-218-0190]

No permittee shall construct or make modifications required to be reviewed under OAR 340-218-0190), the construction/operation modification rules, without receiving a Notice of Approval in accordance with OAR 340-218-0190. The permittee should allow 60 days for LRAPA review of applications for a construction/operation modification if public notice is not required, or 180 days if public notice is required.

G19. New Source Review Modification [LRAPA Title 38]

No permittee shall construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010). The permittee should allow 180 days for LRAPA review of an ACDP application for New Source Review.

G20. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G21. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

The permittee shall furnish to LRAPA, within a reasonable time, any information that LRAPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to LRAPA copies of records required to be retained by the permit.

- G22. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-020]
- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
 - b. A permit shall be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
 - c. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

G23. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G24. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted as described below.
- b. Applications for renewal shall be submitted at least 12 months before the expiration of this permit, unless LRAPA requests an earlier submittal. If more than 12 months is required to process a permit renewal application, LRAPA shall provide no less than six (6) months for the owner or operator to prepare an application. Provided the permittee submits a timely and complete renewal application, this permit shall remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G25. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G26. Property Rights [OAR 340-200-0020(9)(c) and 340-218-0050(6)(d)]

The 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, except as provided in OAR 340-218-0110.

G27. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

The permittee shall have available at the facility at all times a copy of the LRAPA Title V Operating Permit and shall provide a copy of the permit to LRAPA or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

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

Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

MAX/bp
5/24/06