

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

**SYNTHETIC MINOR
AIR CONTAMINANT DISCHARGE PERMIT (SM-ACDP)**

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

| | |
|---|---|
| <u>Issued to:</u> Newood Display Fixture Mfg. Company 10 North Seneca Road Eugene, Oregon 97402 | <u>Land Use Compatibility Statement:</u> From: City of Eugene Date Issued: October 27, 1997 |
| <u>Mailing Address:</u> P.O. Box 21808 Eugene, Oregon 97402-0412 | <u>Fee Basis:</u> Table A, Part II: 20 Furniture and Fixture Manufacturing |
| <u>Permit Number:</u> 205808 <u>Permit Type:</u> Synthetic Minor <u>SIC:</u> 2541 Wood Office and Store Fixtures <u>Date Renewed:</u> June 25, 2005 <u>Expiration Date:</u> June 24, 2010 | <u>Permitted Sources</u> Facility Coating and Solvent Use Spray booths (4) Coating Oven (1) and Woodworking Equipment |

Issued

By:

Merlyn L. Hough, Director

Effective
Date:

Permitted Activities

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

Synthetic Minor Limits

2. Potential emissions from this source shall be limited by federally enforceable conditions. In accordance with LRAPA 34-120, the facility has elected to limit emissions of any single Hazardous Air Pollutant (HAP) and any combination of Hazardous Air Pollutants (HAPs) to remain below the Title V thresholds of ten (10) tons per year for a single HAP and twenty-five (25) tons per year for any combination of HAPs.

Total HAP emissions from all sources located on the plant site shall not exceed the following limits.

**SYNTHETIC MINOR EMISSION LIMITS
(tons per 12-month period)**

| Source | HAP _{SINGLE} | HAP _{AGGREGATE} |
|--|-----------------------|--------------------------|
| Facility Coating and Solvent Use and Drying Oven | 9 | 24 |

3. This facility shall not use materials which would emit more than:
9 tons HAP per rolling 12-month period
24 tons combined HAPs per rolling 12-month period
4. To demonstrate compliance with Condition Nos. 2 and 3, the facility shall calculate and maintain records of the HAP and HAPs emissions rate of each month, and a summary of combined monthly emissions for each rolling 12-month period, as required by Condition Nos. 7 and 12.

Plant Site Emission Limits (PSEL)

5. Total facility emissions shall not exceed the annual limits listed below. The annual limits are based on synthetic minor status, maximum projected production, material balance calculations,

and an assumed dust removal efficiency for the control equipment (baghouse). The emission calculation procedures are found in Condition Nos. 8 and 12.

**Annual PSELS
 (tons per 12-month period)**

| Source | PM ₁₀ * | PM* | SO _x | NO _x | CO | VOC |
|---|--------------------|----------|-----------------|-----------------|-----------|-----------|
| Facility-wide Coating and Solvent Use and Drying Oven | --- | --- | --- | --- | --- | 39 |
| Woodworking Dust Collection System Abated by a Baghouse | 1 | 1 | --- | --- | --- | --- |
| TOTAL ANNUAL PSEL | 1 | 1 | NA | NA | NA | 39 |

*Woodworking dust abated by the baghouse is assumed to be 1 ton per year.

6. Any changes in operation that may increase the emissions must be approved by LRAPA, prior to the change. Failure to do so may result in enforcement actions being taken by LRAPA. Substitutions of coatings may be employed provided that both consumption and composition records are maintained according to the permit reporting requirements. [LRAPA 34-110(5)]

Emissions Calculations

7. The facility HAP emissions shall be determined using the following material balance calculations, and assuming 100% of volatile HAP are emitted:

HAP Emissions:

$$E_{HAP} = 3 [(RM \times D_m \times \%HAP_{wt})/2000]$$

$$E_{HAPS} = 3 E_{HAP}$$

Where:

- E_{HAP} = Emission of Individual (Each) HAP, tons/month
- E_{HAPS} = Combined HAPS Emission, tons/month
- RM = Use of Material With Each HAP, gallons/month
- D_m = Density of Material Containing Each HAP, pounds/gallon

%HAP = % by weight each HAP in Material

8. The facility VOC emissions shall be determined using the following material balance calculations, and assuming 100% of VOC are emitted.

VOC Emission Calculations:

$$E_m = (RM \times D_m \times \%VOC_{wt})/2000$$
$$E_{VOC} = 3 E_m$$

Where:

| | | |
|-----------|---|---------------------------------------|
| E_m | = | VOC Emitted Each Material, tons/month |
| E_{VOC} | = | Total VOC emitted, tons/month |
| RM | = | Use of Material, gallons/month |
| D_m | = | Density of Material, pounds/gallon |

9. The facility PM and PM₁₀ emission rate(s) shall be determined as follows:

| | | |
|---------------|---|--|
| $E_{PM/PM10}$ | = | RM * EF/2000 |
| $E_{PM/PM10}$ | = | PM and PM ₁₀ emission, tons/months |
| RM | = | Raw Material usage (receipt/deliveries for each month), bone dry ton (BDT) |
| EF | = | Emission Factor of 1.0 pound PM/BDT and 1.0 pound PM ₁₀ /BDT (reference: LRAPA Permit No. 205808, Issue Date 6/25/2000) |

Particulate Emission Limits

10. In no event shall visible emissions from this facility equal or exceed 20 percent opacity. [LRAPA 32-010(1)(B)]
11. The particulate emissions from the baghouse at this facility shall not exceed 0.1 grain per standard dry cubic foot. [LRAPA 32-015 (2)]

Special Conditions

12. If the facility anticipates that future emissions level of criteria's pollutants or HAPs, excluding excess emissions allowed under LRAPA 36-015(1), will exceed the Title V thresholds (as defined in OAR 340 Division 218), the permittee shall apply and obtain an approved Title V Operating Permit. [OAR 340-218-0010(1) and OAR 340-218-0020(1)(a)]

Monitoring, Recordkeeping and Reporting Requirements

13. The permittee shall monitor and maintain records of the following information:

| Activity | Parameter | Units | Recording Frequency |
|--|------------------------------|--------------------|---------------------|
| Use of VOC- and/or HAP-containing material | Amount of each material used | gallons | Monthly |
| | Density of each material | pounds/gallon | For each material |
| | VOC Content, minus water | % by weight | In each material |
| | HAP Content | % by weight | In each material |
| Woodworking | Production Rate | bone dry ton (bdt) | Monthly |

NOTE: VOC/HAP-containing material includes, but is not limited to, coatings, lacquers, thinners, stains, topcoats, and solvents.

14. The facility shall record the type and amount of coatings, solvents and raw wood material it uses each month. These monthly usage records, and the records required by Condition No. 13, shall be used to calculate and record the amount of VOC, each HAP, combined HAPs, and PM/PM₁₀ emitted each month. The calculated emissions for each month shall be used with the calculated emissions for the previous 11-months to produce a record of cumulative emissions for each rolling 12-month period to demonstrate compliance with the emission limits in Conditions Nos. 2 and 6. Records shall be used monitor ongoing compliance to ensure future operations will not cause emissions to exceed permitted levels. All required records and supporting calculations shall be maintained for at least five (5) years, kept on site and be made available upon request by an LRAPA representative.
15. The facility shall submit a semiannual report that documents the most recent 12-month period of emissions comply with the limits set in this permit. The semiannual reports shall be submitted on a biannual basis and are due thirty (30) days after the end of each six-month reporting period.

16. The baghouse shall be equipped with a pressure differential gauge that indicates the pressure drop across the bags. The gauge shall be maintained in good working condition at all times and shall be located in an easily accessible location. The owner/operator shall maintain a log of the weekly pressure drop measurement across the baghouse. This log shall be maintained onsite and made available to LRAPA representatives.
17. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office: [LRAPA 34-070 (5)]

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

Billing and Invoicing

18. In accordance with adopted regulations, the permittee will be invoiced annually for the Compliance Determination Fee and for all applicable fees associated with the ACDP. [LRAPA 34-150(3)]

SLL/bp
3/28/06

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request.
- G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

Performance Standards and Emission Limits

- G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]

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

Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are considered unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. [LRAPA 32-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. The permittee must immediately (i.e., as soon as possible, but in no case more than one (1) hour after the beginning of the excess emissions period) notify LRAPA by telephone or in person of all cases of excess emissions due to upset or breakdown. [LRAPA 36-020(1)] Notification shall include:
- a. source name;
 - b. nature of the emissions problem;
 - c. name of the person making the report;
 - d. name and telephone number of the contact person for further information;

- e. date and time of the onset of the upset condition;
- f. whether or not the incident was planned;
- g. equipment involved in the upset or breakdown;
- h. estimated type and quantity of excess emissions;
- i. estimated time of return to normal operations;
- j. efforts made to minimize emissions; and
- k. description of remedial actions to be taken.

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

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

- G13. At each reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)]
- G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. [LRAPA 36-025(3) and 36-030(1)] The upset log shall include the following:
 - a. date and time each event was reported to LRAPA;
 - b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
 - c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;
 - d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
 - e. final resolution of the cause of the excess emissions.

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

Excess Emissions: Scheduled Maintenance

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

Air Pollution Emergencies

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

Notification of Construction/Modification

- G20. The permittee shall notify LRAPA in writing and obtain approval in accordance with LRAPA 34-035 before:
- a. constructing or installing any new source of air contaminant emissions, including air pollution control equipment; or
 - b. modifying or altering an existing source that may significantly affect the emissions of air contaminants, or
 - c. making any physical change which increases emissions; or
 - d. changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation to levels above those contained in the permit application and reflected in this permit and which result in increased emissions.

Notification of Name Change

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

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

Permit Renewal

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

Termination Conditions

- G24. This permit shall be automatically terminated: [LRAPA 34-140(2)]

- a. within sixty (60) days after sale or exchange of the activity or facility which requires a permit;
 - b. upon change of nature of the activities, operations, emissions, or discharges from those of record in the last application;
 - c. within one (1) year after a plant closure lasting continuously for one (1) or more years;
 - d. upon issuance of a new, renewal, or modified permit for the same operation; or
 - e. upon written request of the permittee.
- G25. In the event that it becomes necessary to suspend or terminate this permit due to non-compliance with the terms of the permit, unapproved changes in operation, false information submitted in the application or any other cause, LRAPA shall notify the permittee by registered or certified mail of its intent to suspend or revoke the permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective twenty (20) days from the date of mailing of such notices unless, within that time, the permittee requests a hearing. Such a request for hearing shall be made in writing and shall state the grounds for such a request. [LRAPA 34-140(3)]
- G26. Termination of this permit resulting from continuous plant closure shall subject the source to review as a new non-permitted source upon application to operate the facility. [LRAPA 34-140(4)]
- G27. If LRAPA finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may suspend or terminate this permit, effective immediately. Notice of such suspension or termination must state the reasons for such action and advise that the permittee may request a hearing. Such a request for a hearing shall be made in writing within ninety (90) days of the date of the suspension and shall state the grounds for the request. [LRAPA 34-140 (5)]
- G28. Any hearing requested shall be conducted pursuant to LRAPA's rules. [LRAPA 34-140(6)]
- G29. The permittee shall submit, by April 20 of each year, the emission inventory form provided by LRAPA.