



**LANE REGIONAL AIR PROTECTION AGENCY**  
1010 Main Street, Springfield, Oregon 97477  
(541) 736-1056

**SIMPLE**  
**AIR CONTAMINANT DISCHARGE PERMIT (ACDP)**

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

Issued To:

**Bowtech Inc.**  
90554 Highway 99N  
Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene  
Dated: September 9, 2009

Plant Site Location:

**Waterdog Surface Technologies**  
90554 Highway 99N  
Eugene, Oregon 97402

Fee Basis:

Table 37, Table 1, Part B. 69.  
Surface coating operations > 250 gallons per month

Permit Number: 208944

Permit Type: Simple

SIC: 3949 – Sporting and Athletic Goods

Date Issued: December 18, 2020

Expiration Date: December 18, 2025

Information Relied Upon

Application No.: 65384

Date Received: September 9, 2019

Permitted Sources:

Five (5) Paint Booths

Issued

By: \_\_\_\_\_

Merlyn L. Hough, Director

Effective

Date: December 18, 2020

Permitted Activities

1. Until this permit expires or is revoked, the permittee 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).

Emission Unit Description

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

Emission Unit	Control
PB – Five (5) Paint Booths	Controlled by dry filters

Plant Site Emission Limits (PSELs)

3. Total emissions from all sources at the plant must not exceed the annual (12-month rolling) limits below: [LRAPA 42-0040 and 42-0060]

**Annual PSEL**

Pollutant	Plant Site Emission Limit (tons/year)
VOC	39
Individual HAP	9
Aggregate HAPs	24

4. The annual plant site emission limits apply to any 12-consecutive calendar month period.

PSEL Monitoring and Compliance

5. **By the 10<sup>th</sup> working day of each month**, the permittee must determine compliance with the 12-month rolling VOC PSEL in accordance with the following procedures. All of the VOC content of the coatings is assumed to be emitted to the atmosphere.

The permittee must maintain usage records of all materials that contain VOC in accordance with Condition 10 and calculate emissions using the following equation:

**For VOC:**       $E = \sum (RM \times D \times VOC \times EF \times K)$

- Where:
- E = VOC emission in tons per month and tons per year;
  - ∑ = Symbol representing “summation of”;
  - RM = Raw Material usage in gallons per month and gallons per year;
  - D = Density of each Raw Material used in pounds per gallon as obtained from the SDS/CPDS;

VOC	=	VOC content of Raw Material by weight fraction as obtained from the SDS/CPDS;
EF	=	Emission Factor. Unless the SDS or Certified Product Data Sheet states otherwise, an emission factor of 1.0 will be assumed for all raw material containing VOC; and
K	=	Conversion Factor Constant: 1 ton equals 2,000 pounds

6. The permittee must monitor HAP emissions by calculating a 12-month total for each HAP and combination of HAPs **by the 10<sup>th</sup> working day of each month**. The 12-month rolling total must be determined by summing the total HAP emissions from the previous 12 months.

Monthly HAP emissions must be calculated using the following method. The density and HAP content of each material used must be obtained for the SDS or Certified Product Data Sheet. Where a range of HAP contents is listed in the SDS, the highest value in the range must be used for this calculation.

$$HAP\ Emissions = \left( \frac{\% \ HAP \ by \ Weight}{100} \right) \times \left( \frac{Density \ (lb)}{gallon} \right) \times \left( \frac{Gallons \ Consumed}{month} \right) \times \left( \frac{1 \ ton}{2000 \ lbs} \right)$$

#### General Emission Limitations

7. The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source in excess of the following limits: 0.14 grains per dry standard cubic foot, for sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results. This condition does not apply to fugitive emission sources, fuel burning equipment, refuse burning equipment, or to solid-fuel burning devices certified under OAR 340-262-0500. [LRAPA 32-015(1) and LRAPA 32-015(2)(b)(B)]
8. The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour from sources, other than wood fired boilers. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and LRAPA 32-010(3)]
9. The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from EU-PB in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045]

#### Source-Specific Emission Limitations

10. The permittee must utilize the following operational and work practice requirements for paint booth operations: [LRAPA 32-007(1)]
- All spray-applied coatings must be applied in a paint booth fitted with filters demonstrated to achieve at least 98% capture of paint overspray. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement.
  - All spray-applied coatings must be applied using high volume, low pressure (HVLP) spray gun technology. The permittee may use an equivalent spray coating application technology that is demonstrated to achieve a transfer efficiency comparable to HVLP spray coating application technology for which written approval has been obtained from LRAPA prior to use.

- c. All manual spray gun system cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent.
  - d. The permittee must ensure and certify that all personnel, including contract personnel, who spray apply surface coatings, are trained in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment.
  - e. The permittee must ensure that storage containers used for VOC-containing materials are kept closed at all times except when adding or removing material.
11. The permittee must prepare and update, as needed, an Inspection and Maintenance Plan (I&M Plan) for the paint booth operations. The permittee must submit a copy of the I&M Plan to LRAPA for review upon request. If LRAPA determines the I&M Plan is deficient, LRAPA may require the permittee to amend the plan. At minimum, the I&M Plan must include inspection schedules for the paint booth and the associated dry filters used to control overspray. The I&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary. [LRAPA 32-007(1)]

Monitoring, Recordkeeping, and Reporting Requirement

12. The permittee must monitor and maintain records for a period of five (5) years from the date of entry of the following information: [LRAPA 34-016 and 42-0080]

Activity	Parameter	Units	Minimum Recording Frequency
VOC/HAP-containing Material Usage	Material Usage	Gallons or Pounds	Monthly
VOC/HAP-containing Material Usage	Density of Material	Pounds per Gallon	Maintain current information at all times
VOC- containing Material Usage	VOC content	% By Weight	Maintain current information at all times
HAP- containing Material Usage	Individual HAP content	% By Weight	Maintain current information at all times
Paint Booth Filter Particulate Matter Control Efficiency	Control Efficiency	% Efficiency	Maintain documentation from each manufacturer
Paint Booth Training	Training Logs / Certifications	NA	Maintain documentation of training for spray coating personnel
Paint Booth Inspections	Occurrence	NA	Each inspection
Paint Booth Filter Replacement	Occurrence	NA	Upon Replacement

Activity	Parameter	Units	Minimum Recording Frequency
Inspection and Maintenance (I&M) Plan Activities and Parameters	Document	NA	As Specified in the I&M Plan

- a. VOC/HAP-containing materials include, but are not limited to, coatings, lacquers, thinners, stains, topcoats, solvents, adhesives, cleaning, and wash-off materials.
  - b. The density and VOC/HAP content information must be supplied from CPDS or SDS provided by the manufacturer/supplier of the VOC/HAP containing material.
13. An annual report is due **February 15<sup>th</sup>** of each year. The report must document any new VOC/HAP-containing raw materials used by the facility and must provide updated or new Safety Data Sheets or Certified Product Data Sheets, as necessary. The report must include the information required per Conditions 5 and 6. [LRAPA 34-016 and 42-0080]
  14. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office: [LRAPA 34-016]

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

#### Fee Schedule

15. In accordance with adopted regulations, the permittee shall be invoiced by **October 1<sup>st</sup>** of each year with fees due **December 1<sup>st</sup>** of each year. [LRAPA 37-8020 Table 2]

Max/cmw  
12/18/2020

**Abbreviations, Acronyms, And Definitions**

ACDP	Air Contaminant Discharge Permit
Calendar Year	The 12-month period beginning January 1 <sup>st</sup> and ending December 31 <sup>st</sup>
CFR	Code of Federal Regulation
CO	Carbon Monoxide
CPDS	Certified Product Data Sheet
D	Density
DEQ	Oregon Department of Environmental Quality
dscf	Dry Standard Cubic Foot
EF	Emission Factor
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
gal	Gallon(s)
gr/dscf	Grains per Dry Standard Cubic Foot
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44
I&M	Inspection and Maintenance
K	Conversion Factor Constant
lb	pounds
LRAPA	Lane Regional Air Protection Agency
MMBtu	Million British thermal units
NA	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O <sub>2</sub>	Oxygen
OAR	Oregon Administrative Rules
OERS	Oregon Emergency Response System
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particle Matter
PM <sub>10</sub>	Particulate Matter less than 10 microns in size
PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns in size
ppm	Part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
RM	Raw Material
SDS	Safety Data Sheet
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
VE	Visible Emissions
VOC	Volatile Organic Compound
Year	A period consisting of any 12-consecutive calendar months

## **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. [LRAPA 37-0020(3)]
- G2. The permittee must 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 must not cause or permit the deposition of any particulate matter which is larger than 250 microns in size at sufficient duration and quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]
- G5. The permittee must not discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090(1)]
- G6. The permittee must 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 must 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 32-050(1)]
- G8. The permittee must 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 32-050(2)]
- G9. The permittee must 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(1)]
- G10. The permittee may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause nuisance. [LRAPA 49-010(1)]

### Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are 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, including but not limited to excess emissions resulting from the breakdown of air pollution control devices or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSPS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [LRAPA 36-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply: [LRAPA 36-020(1)]
- a. The owner or operator, of a small source, as defined by LRAPA 36-005(7), need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health.
  - b. Notification must 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 must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.
  - c. Follow-up reporting, if required by LRAPA, must contain all information required by Condition G15.
- G13. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee must submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)(a)]
- G14. Any excess emissions which could endanger public health or safety must immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee must keep an upset log of all planned and unplanned excess emissions. The upset log must include the following: [LRAPA 36-025(3) and 36-030(1)]
- 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 must be kept by the permittee for five (5) calendar years. [LRAPA 36-025(3)]



Excess Emissions: Scheduled Maintenance

- G16. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution control devices may result in excess emissions, the permittee must obtain prior LRAPA authorization of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. The application must include the following: [LRAPA 36-015(1)]
- a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions 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 device or system to be maintained;
  - c. identification of the 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 at all times during the scheduled maintenance.
- G17. No scheduled maintenance associated with the approved procedures in Condition G16 that is likely to result in excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as PM<sub>2.5</sub> or PM<sub>10</sub> nonattainment areas. [LRAPA 36-015(6)]
- 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 36-015(3), the permittee must immediately notify LRAPA by telephone of the situation, and must be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(7)]

Air Pollution Emergencies

- G19. The permittee must, upon declaration of an air pollution alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittees responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

Notification of Construction/Modification

- G20. The permittee must notify LRAPA in writing using an LRAPA "Notice of Intent to Construct" form, or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:

- a. constructing, installing or establishing a new stationary source that will cause an increase in regulated pollutant emissions
- b. making any physical change or change in the operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. constructing or modifying any pollution control equipment.

#### Notification of Name Change

- G21. The permittee must 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. [LRAPA 37-0030(4)]

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 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDP. [LRAPA 37-0040(2)(b)]
- G23. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit: [LRAPA 37-0082(1)(a)]
- a. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or
  - b. Another type of permit, ACDP or Title V, has been issued authorizing operation of the source.
- G24. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)]
- G25. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [LRAPA 37-0040(4)]

#### Termination Conditions

- G26. This permit will be automatically terminated upon: [LRAPA 37-0082(2)]
- a. Issuance of a renewal or new ACDP for the same activity or operation;
  - b. Written request of the permittee, if LRAPA determines that a permit is no longer required;
  - c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or;
  - d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.

- G27. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any applicable rule or statute, LRAPA may revoke the permit. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee, and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60th day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]
- G28. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three months of the permit expiration date. [LRAPA 37-0082(3)]
- G29. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided under LRAPA Title 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A permittee's written request for hearing must be received by LRAPA within 90 days of service of the notice on the permittee and must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]
- G30. Any hearing requested must be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

Asbestos

- G31. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 1/12/18]