



**LANE REGIONAL AIR PROTECTION AGENCY  
TITLE V OPERATING PERMIT  
REVIEW REPORT**

1010 Main Street  
Springfield, OR 97477

**9Wood, Inc.**  
999 South A Street  
Springfield, Oregon 97477  
Website: <http://9wood.com/>

**Permit No. 209600**

**Source Information:**

Primary SIC	2541
Secondary SIC	--
Primary NAICS	337212
Secondary NAICS	--

Source Category (LRAPA Title 37, Table 1)	Part B: 69. Surface coating operations: coating operations whose actual or expected usage of coating materials is greater than 250 gallons per month. Part C: 4. All sources that request a PSEL equal to or greater than the SER for a regulated pollutant.
Public Notice Category	III

**Compliance and Emissions Monitoring Requirements:**

Unassigned emissions	NA
Emission credits	NA
Compliance schedule	NA
Source test date(s)	NA

COMS	NA
CEMS	NA
Ambient monitoring	NA

**Reporting Requirements**

Annual report (due date)	March 1
Semi-Annual Report (due date)	March 1
	September 1
Greenhouse Gas (due date)	NA

Monthly report (due dates)	NA
Quarterly report (due dates)	NA
Excess emissions report	Immediately
Other reports	NA

**Air Programs**

NSPS (list subparts)	NA
NESHAP (list subparts)	NA
CAM	NA
Regional Haze (RH)	NA
Synthetic Minor (SM)	NA
SM-80	NA
Part 68 Risk Management	NA
Title V	Y
Major FHAP source	NA
Federal major source	NA

New Source Review (NSR)	NA
Prevention of Significant Deterioration (PSD)	NA
Acid Rain	NA
Clean Air Mercury Rule (CAMR)	NA
TACT	NA
>20 Megawatt	NA
Cleaner Air Oregon (CAO)	NA

**TABLE OF CONTENTS**

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT ..... 3

INTRODUCTION ..... 4

FACILITY DESCRIPTION ..... 4

GENERAL BACKGROUND INFORMATION ..... 4

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION ..... 5

AGGREGATE INSIGNIFICANT ACTIVITIES ..... 5

TITLE V PERMIT CHANGE LOG ..... 6

CATEGORICALLY INSIGNIFICANT ACTIVITIES ..... 6

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING ..... 7

EMISSION LIMITS FOR INSIGNIFICANT ACTIVITIES ..... 9

FEDERAL REQUIREMENTS ..... 9

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION ..... 11

UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS ..... 11

SIGNIFICANT EMISSION RATE ..... 12

HAZARDOUS AIR POLLUTANTS (HAPS) ..... 12

GENERAL TESTING REQUIREMENTS ..... 13

SOURCE TEST RESULTS ..... 14

RECORDKEEPING REQUIREMENTS ..... 14

REPORTING REQUIREMENTS ..... 14

COMPLIANCE HISTORY ..... 14

PUBLIC NOTICE ..... 15

EMISSIONS DETAIL SHEETS ..... 15

**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT**

ACDP	Air Contaminant Discharge Permit	NO <sub>x</sub>	Nitrogen oxides
AQMA	Air Quality Management Area	NSPS	New Source Performance Standards
Act	Federal Clean Air Act	NSR	New Source Review
ASTM	American Society of Testing and Materials	O <sub>2</sub>	Oxygen
Btu	British thermal unit	OAR	Oregon Administrative Rules
CAM	Compliance Assurance Monitoring	ODEQ	Oregon Department of Environmental Quality
CAO	Cleaner Air Oregon	ORS	Oregon Revised Statutes
CEMS	Continuous Emissions Monitoring System	O&M	Operation and maintenance
CFR	Code of Federal Regulations	Pb	Lead
CI	Compression Ignition	PCD	Pollution Control Device
CMS	Continuous Monitoring System	PM	Particulate matter
CO	Carbon Monoxide	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
CO <sub>2</sub>	Carbon dioxide	PM <sub>10</sub>	Particulate matter less than 10 microns in size
CO <sub>2e</sub>	Carbon dioxide equivalent	ppm	Parts per million
COMS	Continuous Opacity Monitoring System	PSEL	Plant Site Emission Limit
CPDS	Certified Product Data Sheet	psia	pounds per square inch, actual
CPMS	Continuous parameter monitoring system	PTE	Potential to Emit
DEQ	Department of Environmental Quality	RATA	Relative Accuracy Testing Audit
dscf	Dry standard cubic feet	RICE	Reciprocating Internal Combustion Engine
EF	Emission factor	SACC	Semi-Annual Compliance Certification
EPA	US Environmental Protection Agency	SCEMP	Surrogate Compliance Emissions Monitoring Parameter
EU	Emissions Unit	Scf	Standard cubic foot
FCAA	Federal Clean Air Act	SER	Significant emission rate
FHAP	Federal Hazardous Air Pollutant as defined by LRAPA title 12	SERP	Source emissions reduction plan
ft <sup>2</sup>	Square foot	SI	Spark Ignition
FSA	Fuel sampling and analysis	SIC	Standard Industrial Code
GHG	Greenhouse Gas	SIP	State Implementation Plan
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SO <sub>2</sub>	Sulfur dioxide
HCFC	Halogenated Chlorofluorocarbons	ST	Source test
ID	Identification number or label	TAC	Toxic air contaminant as defined by OAR 340-245-0020(56)
I&M	Inspection and maintenance	TACT	Typically Achievable Control Technology
LAER	Lowest Achievable Emission Rate	TPY	Tons per year
LRAPA	Lane Regional Air Protection Agency	VE	Visible emissions
MACT	Maximum Achievable Control Technology	VMT	Vehicle miles traveled
MM	Million	VOC	Volatile organic compounds
MMBtu	Million British thermal units	VHAP	Volatile hazardous air pollutant
MW	Megawatts	Year	A period consisting of any 12 consecutive calendar months
NA	Not applicable		
NESHAP	National Emission Standards for Hazardous Air Pollutants		

## INTRODUCTION

1. 9Wood, Inc., (“9Wood” or “the facility”) is an existing facility applying for an initial Title V federal operating permit. Upon issuance, the initial Title V federal operating permit will be valid for 5 years.
  - 1.a. Information relied upon: The initial permit is based upon applications (Nos. 69691 and 69728) received June 21, 2023 and July 19, 2023.
2. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

## FACILITY DESCRIPTION

3. The facility uses four (4) spray paint booths known as SB-1 through SB-4 for spray painting suspended wood ceiling components. The facility was built in August of 2005. The manual spray booth SB-1 was installed in August of 2005. The samples spray booth SB-2 was installed in December of 2014. The automated spray booth line SB-3 was installed in May of 2018. The R&D automated spray booth line SB-4 was installed in July of 2021.
4. The facility is located in an area that is generally flat. To the north of the facility there is a commercial area with scattered residential housing. To the east of the facility is a mixed commercial and industrial area. To the south of the facility there is a rail line and green space. To the west of the facility is a commercial area and a former rail yard.

## GENERAL BACKGROUND INFORMATION

5. 9Wood is a Title V major source because potential emissions of VOC exceed 100 tons per year. The facility is not a federal major source for PSD purposes because the potential emissions of any individual regulated pollutant, excluding GHGs, are less than 250 tons per year and the facility is not in a listed source category. In addition, 9Wood is a synthetic minor source of federal HAPs.
6. The facility is located inside the Eugene-Springfield Air Quality Management Area. The facility is located in an area that has been designated attainment/unclassified for PM<sub>2.5</sub>, ozone (VOC), NO<sub>2</sub>, SO<sub>2</sub>, and Pb and a maintenance area for CO and PM<sub>10</sub>. The facility is located within 100 kilometers of two (2) Class I air quality protection areas: Diamond Peak Wilderness and Three Sisters Wilderness area.
7. LRAPA has reviewed and issued the following permitting actions to this facility:

Date Approved	Permit Action Type	Description
10/03/2010	Simple ACDP	Initial Permit
08/27/2014	NC-209600-A14	Installation of an open face samples spray booth (SB-2)
10/27/2014	Addendum No. 1	Incorporation of NC-209600-A14
03/21/2016	Simple ACDP	Renewal
05/28/2019	Standard ACDP	Initial permit including first automated spray booth (SB-3)
12/18/2020	NC-209600-A20	Installation of R&D automated spray booth (SB-4)
01/25/2021	Addendum No. 1	Incorporation of NC-209600-A20

Date Approved	Permit Action Type	Description
06/22/2022	Addendum No. 2	Increase the PSEL for VOCs from 99 TPY to 135 TPY.
Upon Issuance	Title V Operating Permit	Initial Title V Operating Permit

### EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

8. The emissions units at this facility are the following:

EU ID	Emission Unit Description	PCD ID	Pollution Control Device Description	Date Constructed / Last Modified
SB-1	Manual Spray Booth	DF-1	Dry Filters	2005
SB-2	Samples Spray Booth	DF-2	Dry Filters	2014
SB-3	Automated Spray Booth Line	DF-3	Dry Filters	2018
SB-4	R&D Automated Spray Booth Line	DF-4	Dry Filters	2021

9. Manual Spray Booth (EU: SB-1): Spray booth SB-1 is a manual spray booth using one (1) air assisted airless spray gun. Spray booth SB-1 is used for touch-up and odd shapes. Any touch-up or production activities from this booth are air dried. Overspray from spray booth SB-1 is controlled by dry filters.
10. Samples Spray Booth (EU: SB-2): Spray booth SB-2 is a manual spray booth using one (1) air assisted airless spray gun. Spray booth SB-2 is used for touch-up and odd shapes. Any touch-up or production activities from this booth are air dried. Overspray from spray booth SB-2 is controlled by dry filters.
11. Automated Spray Booth Line (EU: SB-3): Spray booth SB-3 is an automated spray booth line equipped with eight (8) paint spray heads, although only four (4) heads are operational at any one time. This line is the primary production line for the facility, and it coats flat sections of wood components. The spray heads use air assisted airless spray application technology. Overspray from spray booth SB-3 is controlled by dry filters. Spray booth SB-3 uses hot water heat supplied by two (2) natural gas-fired boilers each with a maximum heat input rating of 1.26 MMBtu per hour to dry the coating at three different locations on the automated spray line. The boilers are redundant and only one boiler is operational at a time. The two (2) boilers are considered Categorically Insignificant Activities under LRAPA title 12.
12. R&D Automated Spray Booth Line (EU: SB-4): Spray booth SB-4 is an automated spray booth line equipped with eight (8) paint spray heads, although only four (4) heads are operational at any one time. The spray heads use air assisted airless spray application technology. Unlike spray booth SB-3, spray booth SB-4 is used for research & development and to smooth the transition from sampling to production. As such, automated spray booth line SB-4 is not equipped with outboard dryers or a production conveyance system. Overspray from spray booth SB-4 is controlled by dry filters.

### AGGREGATE INSIGNIFICANT ACTIVITIES

13. Woodworking Operations (AIA-WO): 9Wood accepts already cut to size and larger sized kiln-dried lumber. The larger sized kiln-dried lumber is cut to size onsite. The wood cutting equipment includes one beam saw equipped with a bag filter, one edge banner equipped with a bag filter, and several table saws and sanders. All the dust collection systems are located inside. The wood is collected internally in a garbage can then manually dumped outside in a covered dumpster. This area and/or equipment does not vent outside. While LRAPA has not estimated emissions of particulate matter from these processes, it is expected to be significantly less than one (1) ton per year because the emissions are exhausted indoors. As such, the emissions from this aggregate insignificant activity and any applicable categorically insignificant activities are also considered de minimis as defined in Title 12 for particulate matter emissions. No PSELs for particulate matter emissions will be included in the permit as allowed under LRAPA 42-0020(3)(a). The

facility also dips the lumber into a fire-retardant solution that air dries prior to coating the wood components. The fire retardant solution has no VOC or HAPs.

#### **TITLE V PERMIT CHANGE LOG**

14. As this is an initial Title V permit, a log listing condition-by-condition changes between a previous Title V permit and the proposed Title V permit is not applicable.

#### **CATEGORICALLY INSIGNIFICANT ACTIVITIES**

15. The facility has the following categorically insignificant activities:
- Constituents of a chemical mixture present at less than 1 percent by weight of any chemical or compound regulated under divisions 200 through 268 excluding divisions 248 and 262 of this chapter, or less than 0.1 percent by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year;
  - Evaporative and tail pipe emissions from on-site motor vehicle operation;
  - Distillate oil, gasoline, natural gas, or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified as categorically insignificant do not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically insignificant with the remainder not categorically insignificant. The following equipment may never be included as categorically insignificant;
    - Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour;
    - Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hour.
  - Office activities;
  - Food service activities;
  - Janitorial activities;
  - Personal care activities;
  - Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance;
  - On-site recreation facilities;
  - Instrument calibration;
  - Maintenance and repair shop;
  - Automotive repair shops or storage garages;
  - Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment;
  - Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities;
  - Temporary construction activities;
  - Warehouse activities;
  - Air vents from air compressors;
  - Air purification systems;
  - Electrical charging station;
  - Instrument air dryers and distribution;

- Fire suppression;
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking;
- Electric motors;
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids;
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment;
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities;
- Fire suppression and training;
- Paved roads and paved parking lots within an urban growth boundary;
- Health, safety, and emergency response activities;
- Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems; and
- Combustion source flame safety purging on startup.

#### **EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING**

16. Section 70.6(a)(3) of the federal Title V permit rules requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the facility's compliance with the permit. However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.
17. The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. In addition, the permit includes monitoring of operating parameters for the processes and pollution control devices. It is assumed that as long as these processes and controls are properly operated, the emissions levels will be below the emissions limits specified in the permit.

#### **Facility-Wide General Emission Limits and Standards**

18. For facilities with the potential for fugitive emissions, the draft permit would not allow or permit 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 as required under LRAPA 48-015(1). This facility does not have any significant fugitive emission sources at this time. If this changes in the future, the permit will be revised to include this requirement and appropriate compliance demonstration.
19. The facility is subject to the nuisance regulations under LRAPA 49-010(1). Compliance will be demonstrated through the maintenance of a complaint log as described in the draft permit.

20. The facility is subject to the limitations under LRAPA 32-055 that prohibit the emission of any particulate matter larger than 250 microns in size at such duration and quantity as to create an observable deposition upon the real property of another person. Compliance will be demonstrated through the maintenance of a complaint log as described in the draft permit.
21. The facility is subject to a limitation such that the permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property as determined by LRAPA. Compliance will be demonstrated through the maintenance of a complaint log as described in the draft permit.
22. In the event that an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee must take the action appropriate to the episode condition as required by LRAPA 51-015. The draft permit contains the appropriate actions for each response level.
23. The draft permit will contain generic language related to the accidental release prevention regulations under 40 CFR Part 68. The permittee must 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, if the facility becomes subject to this regulation.

#### Emission Unit Specific Emission Limits and Standards

24. Spray booth lines SB-1 through SB-4 are subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may 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. Compliance will be demonstrated through the use of operational and work practice requirements, and a plant survey of visible emissions to be completed at least once a quarter.
25. Spray booth lines SB-1 and SB-2 are subject to the following particulate matter emission limitations under LRAPA 32-015(2)(b)(B): For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are not representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot. Compliance will be demonstrated through the use of operational and work practice requirements, and a plant survey of visible emissions to be completed at least once a quarter.
26. Spray booth lines SB-3 and SB-4 are subject to the following particulate matter emission limitations under LRAPA 32-015(2)(c): For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot. Compliance will be demonstrated through the use of operational and work practice requirements, and a plant survey of visible emissions to be completed at least once a quarter.
27. The spray booth lines SB-1 through SB-4 are subject to the process weight rate emission limitation under LRAPA 32-045. Particulate matter emissions in any one hour may not exceed the amount shown in LRAPA 32-8010 for the process weight allocated to each source. Compliance will be demonstrated through the use of operational and work practice requirements, and a plant survey of visible emissions to be completed at least once a quarter.

#### Typically Achievable Control Technology (TACT)

28. LRAPA 32-008(1) requires an existing unit a facility to meet TACT if the emission unit meets the following criteria: The emission unit is not already subject to emission standards for the regulated pollutant under LRAPA title 30, title 32, title 33, title 38, title 39 or title 46 at the time TACT is required; the source is required to have a permit; the emission unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; and LRAPA determines that air pollution control devices and emission reduction processes in use for the emissions do not represent



TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare or the environment.

29. LRAPA 32-008(2) requires new or modified emission units to meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR or Type A State NSR in LRAPA title 38, and applicable NSPS in LRAPA title 46, or any other standard applicable to only new or modified sources in LRAPA title 32, title 33, or title 39 for the regulated pollutant; the source is required to have a permit; if new, the emission unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emission unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.
30. Each of the spray booth lines is expected to have VOC emissions greater than one (1) ton per year for a new source or 10 tons per year for an existing source. While LRAPA has not performed a formal TACT determination for VOCs, LRAPA has determined that (1) the use of air assisted airless (AAA) spray guns (or equivalent), (2) the use of dry filters with a control efficiency of at least 98.8% for particulate matter as determined by the manufacturer, (3) manual spray gun system cleaning is not performed outside a container that collects the gun cleaning solvent, and (4) personnel who apply surface coatings are trained in proper spray application of surface coatings likely meets TACT. Based on vendor literature, AAA spray guns typically achieve a transfer efficiency of between 65-85%. The facility's use of AAA spray guns (or equivalent) results in the application of the least amount of VOC per square foot of product produced for their particular application.

## **EMISSION LIMITS FOR INSIGNIFICANT ACTIVITIES**

31. As identified earlier in this Review Report, this facility has insignificant emissions units (IEUs) that include categorically insignificant activities, as defined in LRAPA title 12 and/or OAR 340-200-0020. For the most part, the standards that apply to IEUs are for opacity and particulate matter. 40 CFR 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the facility's compliance with the permit. However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance the status quo (i.e., no monitoring) will meet Section 70.6(a)(3). For this reason, this permit includes limited requirements for categorically insignificant activities.

## **FEDERAL REQUIREMENTS**

### **Chemical Accident Prevention Provisions**

32. The Title V permit includes standard language related to 40 CFR Part 68 – Chemical Accident Prevention Provisions. Should the material storage rate at this facility subject this facility to 40 CFR Part 68, the facility must satisfy all the applicable risk management requirements, including the development of a risk management plan.

**Stratospheric Ozone-Depleting Substances**

33. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act as amended, Sections 601-618, do not apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

**New Source Performance Standards**

34. The facility is not currently subject to any New Source Performance Standards under 40 CFR Part 60.

**National Emission Standards for Hazardous Air Pollutants (NESHAP)**

35. The facility is not currently subject to any National Emission Standards for Hazardous Air Pollutants under 40 CFR Part 61 or 40 CFR Part 63.

36. The following NESHAP were evaluated and determined to not be applicable to this source:

- 36.a. The facility is not subject to 40 CFR 63 subpart JJ – National Emission Standards for Wood Furniture Manufacturing Operations because the facility is an area source of federal HAPs.
- 36.b. The facility is not subject to 40 CFR 63 subpart HHHHHH ('6H') – National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources because the facility does not perform paint stripping operations or apply coatings to metal or plastic products.

**Compliance Assurance Monitoring (CAM)**

37. The facility is not subject to the provisions of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM) because it does not have any control equipment, emission limitations or pre-control emissions at or above Title V major source levels for any one (1) pollutant-specific emission unit. The following table evaluates CAM applicability for all emission units:

Emission Unit	Uses a Control Device for a Regulated Pollutant	Pollutant	Uncontrolled Potential Emissions Exceed Major Source Threshold	Emission Limitation or Standard Applies for this Pollutant	Subject to CAM for the Pollutant
SB-1	Yes	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	No	Yes	No
SB-1	No	VOC	Yes	No	No
SB-1	No	HAP	No	No	No
SB-2	Yes	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	No	Yes	No
SB-2	No	VOC	Yes	No	No
SB-2	No	HAP	No	No	No
SB-3	Yes	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	No	Yes	No
SB-3	No	VOC	Yes	No	No
SB-3	No	HAP	No	No	No
SB-4	Yes	PM / PM <sub>10</sub> / PM <sub>2.5</sub>	No	Yes	No
SB-4	No	VOC	Yes	No	No
SB-4	No	HAP	No	No	No

**PLANT SITE EMISSION LIMIT (PSEL) INFORMATION**

38. Provided below is a summary of the baseline emission rate, netting basis, plant site emission limit and emissions capacity.

Pollutant	Baseline (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			PTE (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase over the Netting Basis (tons/yr)	
PM	0	0	0	NA	NA	NA	0.59
PM <sub>10</sub>	0	0	0	NA	NA	NA	0.59
PM <sub>2.5</sub>	NA	0	0	NA	NA	NA	0.59
CO	0	0	0	NA	NA	NA	0.52
NO <sub>x</sub>	0	0	0	NA	NA	NA	0.62
SO <sub>2</sub>	0	0	0	NA	NA	NA	0.01
VOC	0	0	0	135	135	135	384
GHG	0	0	0	NA	NA	NA	749

- 38.a. The facility has no baseline emission rates for PM, PM<sub>10</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO, and VOC because the facility was not in operation during the 1978 baseline year. A baseline emission rate is not established for PM<sub>2.5</sub> in accordance with LRAPA 42-0048(3). The facility has no baseline for GHGs because the facility had no GHG emissions above de minimis during any consecutive 12 calendar month period during calendar years 2000 through 2010.
- 38.b. The netting basis for all pollutants is set at zero because the facility was constructed after the 1978 baseline year and the facility has not had any emission increases approved for any of the reasons listed under LRAPA 42-0046(3)(e).
- 38.c. No PSELs were established for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, CO, NO<sub>x</sub> and GHGs because these pollutants will be emitted from the facility at no more than the de minimis emission levels listed in LRAPA title 12. The proposed VOC PSEL remains at 135 TPY as set in the Standard ACDP issued on June 22, 2022.
- 38.d. Detailed calculations for the proposed PSELs and facility PTE for all pollutants can be found in the emissions detail sheets of this Review Report.

**UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS**

39. The facility has no unassigned emissions as shown in the table below. Unassigned emissions are equal to the netting basis minus the source’s current PTE, minus any banked emission reduction credits. The facility has zero (0) tons of emission reduction credits. In accordance with LRAPA 42-0055 the maximum unassigned emissions may not be more than the SER.

Pollutant	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM	0	0.59	0	0	25
PM <sub>10</sub>	0	0.59	0	0	15

Pollutant	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM <sub>2.5</sub>	0	0.59	0	0	10
CO	0	0.52	0	0	100
NO <sub>x</sub>	0	0.62	0	0	40
SO <sub>2</sub>	0	0.01	0	0	40
VOC	0	384	0	0	40
GHG	0	749	0	0	75,000

### SIGNIFICANT EMISSION RATE

40. The proposed PSEL increase over the netting basis is less than the Significant Emission Rate (SER) as defined in LRAPA title 12 rules for all of the pollutants, except for VOCs, as shown below. For VOCs, there is no change in the PSEL that was reviewed and set in the Standard ACDP issued on June 22, 2022.

Pollutant	Netting Basis (tons/year)	Proposed PSEL (tons/year)	Increase from Netting Basis (tons/year)	SER (tons/year)
PM	0	0	0	25
PM <sub>10</sub>	0	0	0	15
PM <sub>2.5</sub>	0	0	0	10
CO	0	0	0	100
NO <sub>x</sub>	0	0	0	40
SO <sub>2</sub>	0	0	0	40
VOC	0	135	135	40
GHG	0	0	0	75,000

### HAZARDOUS AIR POLLUTANTS (HAPS)

41. As discussed in the Emission Details section of this review report, potential federal HAP emissions are based on actual annual emissions for a given time period multiplied by a scaling factor based on the ratio of potential operational hours divided by actual operational hours. In addition, although the facility has requested a PSEL limit on VOCs of 135 TPY, the potential federal HAP emissions presented here have not been reduced proportionally. Potential federal HAP emissions are projected to be 2.26 tons per year, with xylenes having the highest individual federal HAP emissions at 1.23 tons per year. A major source of FHAPs is defined as having potential federal HAP emissions of at least 10 tons per year of any single federal HAP and 25 tons per year of the aggregate of all federal HAPs. This facility does not have potential federal HAP emissions exceeding these thresholds based on the constituents of the current coatings and the facility would normally be considered a minor source of federal HAPs. However, the facility has requested PSEL on federal HAPs be retained in the permit of nine (9) tons per year of any single federal HAP and 24 tons per year of the aggregate of all federal HAPs to allow the facility flexibility in their use of coatings. As such, the facility will be considered a synthetic minor source of federal HAPs.

Under the Cleaner Air Oregon (CAO) program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and is therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants.

LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and 2020 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in rule. All hazardous air pollutants are on the list of approximately 600 toxic air contaminants. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.

42. The table below represents the potential emissions of federal HAPs and CAO TACs from this facility assuming no elected limitations on PSEL.

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
<b>Organics</b>				
75-07-0	Acetaldehyde	1.9E-05	Yes	Yes
67-64-1	Acetone	17.9	No	Yes
107-02-8	Acrolein	1.7E-05	Yes	Yes
71-43-2	Benzene	3.6E-05	Yes	Yes
71-36-3	n-Butyl Alcohol	4.09	No	Yes
112-34-5	Diethylene Glycol Butyl Ether	3.6E-03	Yes	Yes
100-41-4	Ethyl Benzene	0.25	Yes	Yes
111-76-2	Ethylene Glycol Butyl Ether	0.06	No	Yes
50-00-0	Formaldehyde	0.28	Yes	Yes
822-06-0	Hexamethylene Diisocyanate	8.3E-03	Yes	Yes
100-54-3	Hexane	2.9E-05	Yes	Yes
67-56-1	Methanol	1.8E-01	Yes	Yes
78-93-3	Methyl Ethyl Ketone	2.46	No	Yes
91-20-3	Naphthalene	1.9E-06	Yes	Yes
--	POM (inc. PAHs)	2.5E-06	Yes	Yes
67-63-0	iso-Propyl Alcohol	18.29	No	Yes
115-07-1	Propylene	3.3E-03	No	Yes
108-65-6	Propylene Glycol Methyl Ether Acetate	6.14	No	Yes
108-88-3	Toluene	3.1E-01	Yes	Yes
1330-20-7	Xylenes	1.23	Yes	Yes
<b>Inorganic Gases</b>				
7664-41-7	Ammonia	2.0E-02	No	Yes
<b>Metals</b>				
7440-38-2	Arsenic	1.2E-06	Yes	Yes
7440-41-7	Beryllium	7.5E-08	Yes	Yes
7440-43-9	Cadmium	6.9E-06	Yes	Yes
18540-29-9	Chromium, Hexavalent	8.7E-04	Yes	Yes
7440-48-4	Cobalt	5.9E-04	Yes	Yes
7439-96-5	Manganese	2.4E-06	Yes	Yes
7439-97-6	Mercury	1.6E-06	Yes	Yes
7440-02-0	Nickel	1.3E-05	Yes	Yes
7782-49-2	Selenium	1.5E-07	Yes	Yes
<b>Total (TPY) =</b>		51.2	2.26	51.2

**GENERAL TESTING REQUIREMENTS**

43. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct testing to confirm compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

### **SOURCE TEST RESULTS**

44. The facility is not required to conduct performance testing. LRAPA is not aware of any performance testing conducted at this facility. Safety Data Sheets or Certified Product Data Sheets and the material usage are used to determine the facility's VOC and HAP emissions.

### **RECORDKEEPING REQUIREMENTS**

45. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions. The records of all monitoring specified in the Title V permit must be kept at the plant site for at least five (5) years.

### **REPORTING REQUIREMENTS**

46. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a logbook attached to the annual report. Emissions fees reports are required annually.

### **COMPLIANCE HISTORY**

47. LRAPA has issued the following violation notices and/or taken the following enforcement actions against this facility since the facility began operation:
- 47.a. An informational inspection was performed on January 23, 2019 to view automated spray coating line (SB-3). Based upon this visit, it was determined that automated spray coating line (SB-3) was installed without approval from LRAPA and that the facility VOC emissions exceeded the VOC PSEL of 39 tons per year in the Simple ACDP. As a result, LRAPA initiated enforcement action and the facility applied for a Standard ACDP as required under title 37. Notice of Non-Compliance (NON) 3751 was issued on February 6, 2019 for failing to notify LRAPA of the construction of automated spray coating line (SB-3), for not receiving the appropriate LRAPA approvals prior to the installation and operation of automated spray coating line (SB-3), and for exceeding the VOC PSEL of 39 tons per year. 9Wood was then issued Notice of Civil Penalty Assessment (NCP 19-3751) for \$3,800 on April 23, 2019. They paid the civil penalty amount of \$3,800 on May 1, 2019 and the case was closed.
  - 47.b. During the full compliance evaluation performed on May 18, 2023, the facility was determined to not be in compliance with Conditions 9.c. and 15.c. of the Standard ACDP. These conditions require the facility to record visible emission monitoring of emission units SB-1, SB-2, SB-3, and SB-4. ADD MORE.
48. This facility is regularly inspected by LRAPA and occasionally by other regulatory agencies. The following table indicates the inspection history of this facility since the facility began operation:

<b>Type of Inspection</b>	<b>Date</b>	<b>Results</b>
LRAPA - Full Compliance Evaluation	02/12/2013	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	05/18/2023	Not in compliance

**PUBLIC NOTICE**

49. This permit will be on public notice from October 10, 2023 to November 13, 2023. Comments may be submitted in writing during the comment period. LRAPA will hold a public hearing if requested by 10 or more individuals or one person representing a group of 10 or more individuals. After the comment period and hearing, if requested, LRAPA will review the comments and modify the permit as may be appropriate. A proposed permit will then be sent to EPA for a 45-day review period. LRAPA may request and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period.

If the EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

**EMISSIONS DETAIL SHEETS**

50. Detailed emission calculations and supporting information are found in the following appendices:

Appendix A: PTE Emission Calculations

JJW:cmw  
10/10/2023

9Wood, Inc.  
Permit No. 209600  
Expiration Date: [FIVE YEARS AFTER ISSUANCE]