



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

1010 Main St.  
Springfield, OR 97477  
Telephone (541) 736-1056

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:

**Lanz Cabinet Shop, Inc.**  
3025 West 7<sup>th</sup> Place  
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application Number: 69681  
Received: June 14, 2023

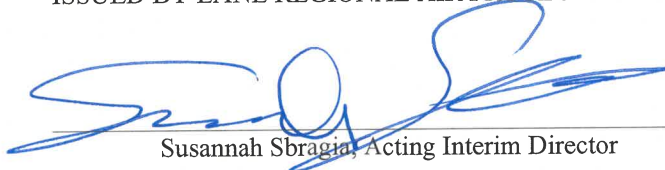
FACILITY LOCATION:

3025 West 7<sup>th</sup> Place  
Eugene, Oregon 97402

LAND USE COMPATIBILITY STATEMENT:

Issued by: Lane County  
Dated: August 7, 1998

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

  
\_\_\_\_\_  
Susannah Sbragia, Acting Interim Director

November 2, 2023  
\_\_\_\_\_  
Effective Date

Nature of Business:

Wood Kitchen Cabinets Manufacturing

SIC

2434

NAICS

337110

RESPONSIBLE OFFICIAL:

Title: President  
Phone: (541) 485-4050

FACILITY CONTACT PERSON:

Name: Kyle Bressler  
Title: President  
Phone: (541) 485-4050

**ADDENDUM NO. 1**  
**Minor Modification**

In accordance with OAR 340-218-0170(1), Title V Operating Permit No. 204739 is hereby amended to revise or update the official title to the responsible official section and to incorporate a new stain line and UV coating line with three (3) natural gas-fired ovens that replaces the current stain and UV lines and to update the control devices for the Sawdust Handling System. The "RESPONSIBLE OFFICIAL: Title", on page 1 of the permit now reads as follows:

RESPONSIBLE OFFICIAL:

Title: President

In section "EMISSION UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION", Condition 3, Table 1 on page 5 of the permit now reads as follows:

3. The emissions units regulated by this permit are the following [OAR 340-218-0040(3)]:

**Table 1: Emission Unit and Pollution Control Device Identification**

(1) Emission Unit Description	EU ID	Pollution Control Device Description	PCP ID
Sawdust Handling System: <b>*Building 1: Baghouses 1 &amp; 4 with dust collection extraction point</b> <b>*Building 2: Baghouse 2 with dust collection extraction point and Baghouse 5 (dust collected at BH-1)</b> <b>*Building 3: Baghouses 3 &amp; 6 with dust collection extraction point</b>	EU-1	Baghouses	BH-1 BH-2 BH-3 BH-4 BH-5 BH-6
Surface Coaters: VOC Emission (only) <b>* UV Coater with ovens</b> <b>*Stain Line</b> Spray Booths Automatic Spray Booth	EU-2	NA	NA
Insignificant Emission Units (IEU)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> : EU-2 Surface Coaters	Paint Filters	NA
	Natural Gas Combustion Units	NA	NA
	• <b>* Three (3) UV Coater Ovens 0.081 MMBtu/hr</b>		
	• Heater: 0.26 MMBtu/hr		
	• Heater: 0.26 MMBtu/hr		
	• Heater: 0.26 MMBtu/hr		
• Small natural gas combustion units = 1.15 MMBtu/hr			

**\*New emission unit or control devices**

BE/cmw  
 11/1/2023

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

1010 Main Street, Springfield, Oregon 97477  
Telephone: (541) 736-1056

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:

**Lanz Cabinet Shop, Inc.**  
3025 West 7<sup>th</sup> Place  
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application: 60513 & 61854  
Received: Renewal Application 06/09/15 & 09/13/16

PLANT SITE LOCATION:

3025 West 7<sup>th</sup> Place  
Eugene, Oregon 97402

LAND USE COMPATIBILITY STATEMENT:

From: City of Eugene  
Dated: 05/26/98

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

**JUL 29 2019**

Effective Date

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Nature of Business: Wood Kitchen Cabinets Manufacturing

Primary SIC: 2434: Wood Kitchen Cabinets  
4961: Natural Gas Fuel Burning Equipment

RESPONSIBLE OFFICIAL:

Title: Vice President of Operations  
Phone: (541) 485-4050

FACILITY CONTACT PERSON:

Name: Kyle Bressler  
Title: Vice President of Operations  
Phone: (541) 485-4050

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**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT**

Annual	Any 12 consecutive 12 calendar month period	OSHA	Occupational Safety and Health Administration
ASTM	American Society of Testing and Materials	Pb	Lead
BACT	Best Available Control Technology	PCD	Pollution control device
BDT	Bone dry ton	PM	Particulate matter
BF	Board feet	PM <sub>10</sub>	Particulate matter less than 10 microns in size
BH	Baghouse	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
Btu	British thermal unit	ppm	Parts per million
CFR	Code of Federal Regulations	ppmv	Parts per million by volume
CO	Carbon monoxide	PSEL	Plant Site Emission Limit
CO <sub>2</sub>	Carbon dioxide	psia	Pounds per square inch absolute
CO <sub>2e</sub>	Carbon dioxide equivalent	RMP	Risk management plans
COMS	Continuous Opacity Monitoring	SERP	Source emission reduction plan
CPDS	Certified Product Data Sheet	scf	Standard cubic foot
CPMS	Continuous Parameter Monitoring System	SDS	Safety Data Sheet
DEQ	Oregon Department of Environmental Quality	SIP	State Implementation Plan
dscf	Dry standard cubic foot of gas volume at 29.92" Hg and 68°F	SO <sub>2</sub>	Sulfur dioxide
EF	Emission factor	SSM	Startup, shutdown, malfunction
EPA	US Environmental Protection Agency	ST	Source test
EU	Emissions unit	UV	Ultra-violet
FCAA	Federal Clean Air Act	VE	Visible emissions
Gal	Gallon	VHAP	Volatile Hazardous Air Pollutant
GHG	Greenhouse gas	VMT	Vehicle mile traveled
gr	grain	VOC	Volatile organic compound
HAP	Hazardous Air Pollutant as defined by LRAPA Title 12		
ID	Identification number		
I&M	Inspection and Maintenance		
lb	pounds		
LRAPA	Lane Regional Air Protection Agency		
MACT	Maximum Achievable Control Technology		
MB	Material balance		
MBF	1,000 Board feet		
Mlb	1,000 pounds		
MM	Million		
MMBtu	Million British Thermal Units		
MMcf	Million cubic feet		
MSDS	Material safety data sheet		
MSF	1,000 square feet		
NA	Not applicable		
NESHAP	National Emission Standards for Hazardous Air Pollutants		
NO <sub>x</sub>	Nitrogen oxides		
NSPS	New Source Performance Standards		
O <sub>2</sub>	Oxygen		
OAR	Oregon Administrative Rules		
ORS	Oregon Revised Statutes		

**DEFINITIONS**

**Modified EPA Method 9:** As used in this permit “Modified EPA Method 9” is defined as follows: Opacity must be measured in accordance with EPA Method 9 using the data reduction procedures in EPA Method 203B. For all standards, the minimum observation period must be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. See also the definition of “Opacity” in LRAPA Title 12.

**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 340-218-0120 and LRAPA 34-180]
2. All conditions in this permit are federally enforceable and LRAPA enforceable except as noted below:
  - 2.a. Conditions 6, 7, G5, and G9 (LRAPA Title 43) are only enforceable by LRAPA. [OAR 340-218-0060]

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

3. The emissions units regulated by this permit are the following [OAR 340-218-0040(3)]:

**Table 1: Emission Unit and Pollution Control Device Identification**

Emission Unit Description		EU ID	Pollution Control Device Description	PCP ID
Sawdust Handling System: Including – Baghouses Truck Dump Hoppers and Waste Wood Chipper		EU-1	Baghouses	DV-1a DV-1b
Surface Coaters: VOC Emissions		EU-2	UV Coater	#244-2
			Spray Booth	DV-4
			Automatic Spray Booth	#325-2
Insignificant Emission Units (IEU)	PM/PM <sub>10</sub> /PM <sub>2.5</sub> : EU-2 Surface Coaters	IEU	NA	NA
	Natural Gas Combustion Units			
	• Phase 1 Boiler: 0.76 MMBtu/hr			
	• Phase 2 Boiler: 2.16 MMBtu/hr			
	• Heater: 0.26 MMBtu/hr			
	• Heater: 0.26 MMBtu/hr			
	• Heater: 0.26 MMBtu/hr			
• Small natural gas combustion units = 1.15 MMBtu/hr				

**EMISSION LIMITS AND STANDARDS**

The following tables contain summaries of applicable requirements other than the Plant Site Emission Limits (PSEL), along with the monitoring methods for the emissions units to which those requirements apply.

**Table 2: Facility-wide Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
LRAPA 48-015(1)(a)-(1)(g) & LRAPA 48-015(3)	4	Fugitive Emissions	Minimize	Recordkeeping	5
LRAPA 49-010	6	Nuisance	Prohibited	Recordkeeping	6.a
LRAPA 32-055	7	PM > 250 micron	No observable deposition offsite	Recordkeeping	7.a
LRAPA 32-007	8	I&M Plan	Implement I&M Plan	Recordkeeping	8
40 CFR Part 68	9	Risk Management	Risk Management Plan	NA	9

Fugitive Emissions

4. **Applicable Requirement:** No permittee must cause, suffer, 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. Such reasonable precautions must include, but are limited to, the following: [LRAPA 48-015(1)(a) through (g) and LRAPA 48-015(3)]
  - 4.a. 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;
  - 4.b. Application of water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - 4.c. Full or partial enclosure of materials stockpiles in cases where applicable of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - 4.d. Installation and use of hoods, fans, and fabrics filters to enclose and vent the handling of dusty materials;
  - 4.e. Adequate containment during sandblasting or other similar operations;
  - 4.f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
  - 4.g. The prompt removal from paved streets of earth or other material which does or may become airborne.



- 4.h. If requested by LRAPA, the permittee must develop a fugitive emission control plan, including but not limited to the work practices in Conditions 4.a through 4.g, that will prevent any visible emissions from leaving the property of a source for more than 18 seconds in six-minute (6-minutes) periods following the procedure of EPA Method 22.
5. Monitoring Requirement: At least once each quarter, for a minimum period of 30 minutes, the permittee must visually survey the plant for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the plant site boundaries for more than 18 seconds in a six-minute period. The person conducting the observation must follow the procedures of EPA Method 22. If sources of visible emissions are identified, the permittee must: [LRAPA 48-015(2)(a) and (b) and 340-218-0050(3)(a)]
  - 5.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 4; and
  - 5.b. Develop a LRAPA approved fugitive emission control plan upon request by LRAPA if the above precautions are not adequate and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute (6-minutes) period.
  - 5.c. Recordkeeping Requirement: The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 22 test.
6. Applicable Requirement: The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)] This condition is only enforceable by LRAPA.
  - 6.a. Monitoring and Recordkeeping Requirement: The permittee must maintain a record (a log) of all air contaminant complaints received by the responsible official or designated employees (written, received via telephone or facsimile, or verbally communicated). Said log must also record the permittee's actions to investigate, make a determination as to the validity of the complaint, and if valid, resolve the problem within two (2) working days of receiving the complaint or within such longer time (not to exceed five (5) working days) as is reasonably necessary. If more than five (5) days are needed to resolve the problem, the permittee must notify LRAPA immediately upon making that determination. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
7. Applicable Requirement: The permittee must not cause or permit emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is only enforceable by LRAPA.
  - 7.a. Monitoring and Recordkeeping Requirement: The permittee must monitor and record compliance with this applicable requirement using facility inspections required in accordance with Condition 6.a. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
8. Applicable Requirement: The permittee must review and update, as needed, the facility-wide inspection and maintenance Plan (I&M Plan). If the plan is updated, the permittee must submit the updated copy to LRAPA for approval. At minimum, the I&M Plan should address inspection schedules for control devices including coating booths and baghouse, leak inspections for all equipment used to transfer or apply materials containing organic compounds, and any proposed facility-specific precautions for avoiding fugitive dust not contained in Condition 4. The I&M Plan must include proposed frequencies of inspections (at least monthly visual inspection of organic material transfer or application equipment for leaks). If a leak is identified, the permittee has five (5) days to perform initial repair, and 15 days to complete final repair, unless the permittee unless the equipment leaking requires replacement in which case the permittee is allowed three (3) months to replace the equipment. The I&M Plan must identify procedures for recording the date and time of any inspections, the condition of the equipment inspected, the identification of equipment inspected, and the actions taken if repairs or maintenance is necessary. The I&M Plan must also identify the frequency of reporting the information to LRAPA. [LRAPA 32-007]
9. Applicable Requirement: Should this facility become subject to the accidental release prevention regulations in 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. [40 CFR Part 68]

**PLANT SITE EMISSIONS LIMITS**

10. Applicable Requirement: The plant site emissions must not exceed the following limits for any 12-consecutive calendar month period: [LRAPA 42-0040 and 42-0041]

**Table 3. Annual Plant Site Emission Limits (PSELs)**

Pollutant	Plant Site Emissions Limit	Unassigned Emissions	Units
PM	24	0	tons/year
PM <sub>10</sub>	14	0	tons/year
PM <sub>2.5</sub>	9	0	tons/year
VOC	70	0	tons/year
GHG as CO <sub>2</sub> e	74,000	0	tons/year

11. Applicable Requirement: The permittee must not combust more than 200,000 therms of natural gas in the boilers and heaters (EU-IEU) per 12-month rolling period. [LRAPA 42-0080]
12. Monitoring Requirement: *By the 15<sup>th</sup> of each month* the permittee must determine compliance with the PSELs, except GHGs, established in Condition 10 by conducting monitoring and calculations for each 12-month rolling period in accordance with the following procedures, test methods, and frequencies: [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
- 12.a. The permittee must collect and maintain records of the following process parameters for each month and annual period for demonstrating compliance with Condition 10. The permittee must keep the following specific records. [LRAPA 34-016]

**Table 4: PSEL Monitoring and Process Parameter for each Emission Unit**

Emission Unit	Pollutants	Process Parameters	Units
Sawdust Handling System: EU-1	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Baghouse(s) material throughput	Tons
Surface Coaters: EU-2	VOC	Coatings, solvents, adhesives, etc. and offsite sludge	
		Quantity	Gallons
		Density	lb/gallon
		VOC content	Percent by weight
Insignificant Emission Units: IEU	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Coatings, solvents, adhesives, etc. sprayed in EU-2: Surface Coaters	Tons
	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NO <sub>x</sub> , CO, SO <sub>2</sub>	Combustion: Natural Gas Usage	Therms

- 12.b. The permittee must calculate PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions for the Sawdust Handling System (EU-1) monthly and 12-month rolling emission using the following formula, and the emission factor given below. Annual entries must be determined by calculating a total for the month and adding the total for the previous 11 months:

**Equation 1:**

$$E_1 = \sum (P_{eu} \times EF_{eu} \times K)^*$$

Where:

E<sub>1</sub> = Pollutant emission in pounds per month and tons per year;

∑ = Symbol representing “summation of”;

P<sub>eu</sub> = Baghouse(s) throughput (in bone dry tons);

EF<sub>eu</sub> = Emission Factor of 0.5 pounds per bone dry ton of throughput (assumes 99.97% baghouse efficiency); and

K = Conversion Constant = 1 ton/2000 lb.

\* Monthly total combination of PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions must be calculated using the following method:

Total PM, PM<sub>10</sub> or PM<sub>2.5</sub> emissions = PM<sub>1</sub> + PM<sub>2</sub> + PM<sub>3</sub> + etc. = ∑ Individual PM, PM<sub>10</sub> or PM<sub>2.5</sub> Emissions; where subscript 1, 2, through 12 represents months in a rolling-12 months period.

- 12.c. The permittee must calculate VOC emissions for the Surface Coaters (EU-2) according to the frequency of monthly and 12-month rolling emissions, using the following formula (mass balance formula). Annual entries must be determined by calculating a total for the month and adding the total for the previous 11 months.

**Equation 2:**

$$E_{2-voc} = \sum (RM \times D \times VOC \times K)^*$$

Where:

E<sub>2-voc</sub> = VOC emission in pounds per month and tons per year;

∑ = Symbol representing “summation of”;

RM = Raw material usage in gallons per month;

D = Density of each raw material used in pounds per gallon as obtained from CPDS, SDS, or MSDS; and

VOC = VOC content of each raw material by weight fraction as obtained from CPDS, SDS, or MSDS; and

K = Conversion Constant = 1 ton/2000 lb.

\* Monthly total combination of VOC emissions must be calculated using the following method:

Total VOC emissions = VOC<sub>1</sub> + VOC<sub>2</sub> + VOC<sub>3</sub> + etc. = ∑ Individual VOC Emissions; where subscript 1, 2, through 12 represents months in a rolling-12 months period.

- 12.d. The permittee must calculate the PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions for the Surface Coaters (EU-2) according to the frequency of monthly and 12-month rolling emissions, using the following formula. Annual entries must be determined by calculating a total for the month and adding the total for the

previous 11 months.

**Equation 3:**

$$E_{2-PM} = \sum (P_{eu} \times EF_{eu} \times K)^*$$

Where:

$E_{2-PM}$  = VOC emission in pounds per month and tons per year;

$\sum$  = Symbol representing “summation of”;

$P_{eu}$  = Total weight of coating applied calculated from the process parameters identified in Table 4;

$EF_{eu}$  = Emission Factor of 0.0004 lb/lb of coating applied (assuming 99.8% filter efficiency and 20% overspray); and

$K$  = Conversion Constant = 1 ton/2000 lb.

\* Monthly total combination of PM, PM<sub>10</sub> and PM<sub>2.5</sub> emissions must be calculated using the following method:

Total PM, PM<sub>10</sub> or PM<sub>2.5</sub> emissions = PM<sub>1</sub> + PM<sub>2</sub> + PM<sub>3</sub> + etc. =  $\sum$  Individual PM, PM<sub>10</sub> or PM<sub>2.5</sub> Emissions; where subscript 1, 2, through 12 represents months in a rolling-12 months period.

- 12.e. The permittee must calculate PM, PM<sub>10</sub>, PM<sub>2.5</sub>, CO, NO<sub>x</sub>, SO<sub>2</sub> and VOC emission for the Combustion Units (IEU) according to the frequency of monthly and 12-month rolling emissions, using the following formula. Annual entries must be determined by calculating a total for the month and adding the total for the previous 11 months. As long as the total natural gas usage in EU-IEU remains below 200,000 therms per year, no calculations are required.

**Table 5: Natural Gas Emission Factors**

Emission Unit	Pollutant	Emission Factor	Unit
IEU: Combustion	PM	0.00025	lb/therm
	PM <sub>10</sub>	0.00025	lb/therm
	PM <sub>2.5</sub>	0.00025	lb/therm
	CO	0.0084	lb/therm
	NO <sub>x</sub>	0.01	lb/therm
	SO <sub>2</sub>	0.00017	lb/therm
	VOC	0.00055	lb/therm

**Equation 4:**

$$E_{IEU} = \sum (P_{eu} \times EF_{eu} \times K)$$

Where:

$E_{IEU}$  = Pollutant missions in pounds per month and tons per year;

$\sum$  = Symbol representing “summation of”;

$P_{eu}$  = Process parameters identified in Table 4;

$EF_{eu}$  = Emission Factors identified in Table 5 for natural gas

$K$  = Conversion Constant = 1 ton/2000 lb.

- 12.f. The permittee must calculate the plant-wide emission for each pollutant and compare the sum with

the PSELS for that specific pollutant in Condition 9 in accordance to the following formula:

**Equation 5:**

$$E_{TOTAL} = \sum (E_1 + E_2 + E_{IEU})$$

Where:

- $E_{TOTAL}$  = Pollutant emissions totals plant-wide;
- $\sum$  = Symbol representing “summation of”;
- $E_1$  = Pollutant emissions from EU-1;
- $E_2$  = Pollutant emissions from EU-2;
- $E_{IEU}$  = Pollutants emissions from EU-IEU.

**EMISSION-UNIT-SPECIFIC EMISSION LIMITS AND STANDARDS**

**Sawdust Handling System (EU-1): Particulate Matter**

**Table 6: Sawdust Handling System (EU-1)**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	Condition Number
LRAPA 32-010(3)	13	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	13.a
LRAPA 32-015(2)	14	PM	0.10 gr/dscf	VE Periodic Monitoring	16 and 17
LRAPA 32-045	15	PM	Process Weight Limits in Section 32-8010	VE Periodic Monitoring and Baghouse(s) Inspection	16 and 17

13. **Applicable Requirement:** The permittee must not allow visible emissions to equal or exceed 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(3)]
  - 13.a. **Monitoring Requirement:** The permittee must monitor visible emissions from sawdust handling system (EU-1) in accordance with Condition 17. [LRAPA 35-0120 and OAR 340-218-0050(3)(a)]
14. **Applicable Requirement:** The permittee must not cause, allow, or permit particulate matter emissions from any air contaminant source in excess of 0.14 grains per dry standard cubic foot for sources installed, constructed, or modified after June 1, 1970 but prior to April 16, 2015. Monitoring must be done in accordance with Condition 17. If testing is required, testing must be done in accordance with Condition 56. [LRAPA 32-015(2)(b) and OAR 340-218-0050(3)(a)(A) and (B)]
15. **Applicable Requirement:** The permittee must not cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from the Sawdust Handling System (EU-1) in excess of the amount shown in Section 32-8010, of LRAPA Title 32, for the process weight rate allocated to EU-1. Monitoring must be done in accordance with Conditions 16 and 17. If testing is required, testing must be done in accordance with Condition 56. [LRAPA 32-045 and OAR 340-218-0050(3)(a)(A) and (B)]
16. **Monitoring Requirement:** The permittee must maintain monthly records of inspection and maintenance of the Sawdust Handling System’s (EU-1) baghouses. The requirements of Condition 13 are considered to be fulfilled providing the permittee complies with the following: [OAR 340-218-0050(3)(a)(A) and (B)]

- 16.a. At least quarterly, the permittee must conduct a six (6) minute visible emissions survey of the baghouse(s), while in operation, using EPA Method 22. If visible emissions are detected at the baghouse(s) stack for more than 5% (18 seconds) of the survey time, the permittee must take corrective actions to minimize the emissions. If visible emissions are identified after corrective actions have been made, the permittee must perform a visible emissions survey using EPA Method 203B (Modified EPA Method 9) as required in Condition 17 within 24 hours of the original visible emissions survey. If the visible emissions exceed the limitation set in Condition 13, the permittee must report the excess emissions to LRAPA per Condition 66. [LRAPA Title 32-010(2)(c) and OAR 340-218-0050(3)(a)(A) and (B)]
- 16.b. The permittee must record all visible emission monitoring (date, time and type of observation – whether using Method 22 or Method 203B (Modified EPA Method 9), visible emission exceedances, and corrective actions taken in a monitoring log.
- 16.c. The permittee must inspect and replace bags (when broken or routinely) and the inspection and maintenance must be recorded in a maintenance log.
- 16.d. If the observer is unable to conduct the survey and/or EPA Method 203B (Modified EPA Method 9) tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather condition such as fog, heavy rain, or snow which impair visibility, or darkness, the observer must not such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day during daylight hours. If the visible emissions survey and/or test could not be conducted on the regularly scheduled day due to interferences, the observer must conduct the test on the following day.
- 16.e. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each visible emissions survey or EPA Method 203B (Modified EPA Method 9) test.
- 17. **Monitoring Requirement:** For the visible emissions standard in Condition 13, the permittee must observe at minimum observation period of six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times of three (3) minutes in any one hour consist of the total duration of all readings during the observation period that are equal to or greater than the opacity of 20% in Condition 13, whether or not the readings are consecutive. Each EPA Method 203B (Modified EPA Method 9) reading represents 15 seconds of time. Three-minute aggregate periods are measured by any of the following: [LRAPA 32-010(2)(a) through (c)]
  - 17.a. EPA Method 203B (Modified EPA Method 9); or
  - 17.b. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
  - 17.c. An alternative monitoring method approved by LRAPA that is equivalent to EPA Method 203B (Modified EPA Method 9).
- 18. **Recordkeeping Requirement:** The permittee must maintain a log of all surveys and corrective actions taken. [LRAPA 35-0120(1)(a) and 340-218-0050(3)(b)]

**Surface Coaters (EU-2): VOC and HAP Emissions**

**Table 7: VOC and VHAP Emissions from Surface Coating (EU-2)**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	Condition Number
40 CFR 63.800 (h)	19	VHAP	Applicability to the regulation	NA	NA

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	Condition Number
40 CFR 63.800 (e)	21	VHAP	Applicability to 40 CFR 63, Subpart A requirements	NA	NA
40 CFR 63.802(b)(1) through (b)(4)	21	VHAP, HAP, and Formaldehyde	Limit VHAP and formaldehyde in accordance with Condition 21 and the table in Attachment 1	Monitoring, Testing, Recordkeeping, and Reporting	34.b, 35, & 36
40 CFR 63.802(c)	22	VHAP	Operation and maintenance practices to minimize emissions	Monitoring, Recordkeeping, and Reporting	48
40 CFR 63.803(a) through (l)	23-34	VHAP	Work practice standards	Monitoring, Recordkeeping, and Reporting	37.f, 43, 44, & 48
40 CFR 63.804(d), (e), (g), and (h)	35-38	VHAP	Compliance procedures and monitoring requirements	Monitoring, Recordkeeping, and Reporting	40-42, 46, & 48
40 CFR 63.805(a)	39	VHAP	Performance testing methods	Monitoring, Emissions Estimations, Recordkeeping, and Reporting	48
40 CFR 63.806(b), (c), (d), (e), (h), (i), (j) and (k)	40-47	VHAP	Recordkeeping requirements	Reporting	48
40 CFR 63.807(c), and (e)	48 & 49	VHAP	Reporting requirements	Reporting	48
LRAPA 38-0070-2	50	VOC	Emission standards	Monitoring, Recordkeeping, and Reporting	51 & 52

19. Applicable Requirement: The permittee must be in compliance with the VHAP emission limits requirements of 40 CFR 63.802 upon startup or by December 7, 1995, whichever is later. [40 CFR 63.800(h)]
20. Applicable Requirement: The permittee must comply with the applicable requirements of 40 CFR 63, Subpart A. [40 CFR 63.800(e)]
21. Applicable Requirement: The permittee must comply with the provisions of Condition 21.a through 21.d: [40 CFR 63.802(b)]
  - 21.a. Limit VHAP emissions from finishing operations by meeting the emission limitations for new sources presented in 40 CFR 63, Subpart JJ – Table 3 [Attachment 1], using any of the compliance methods in Condition 35. To determine VHAP emissions from a finishing material containing formaldehyde or styrene, the permittee of the affected source must use the methods presented in Condition 34.b for determining styrene and formaldehyde usage. [40 CFR 63.802(b)(1)]
  - 21.b. Limit VHAP emission from contact adhesives by achieving a VHAP limit for contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, of no greater than 0.2 lb VHAP/lb solids (0.2 kg VHAP/kg solids), as applied, using either of the

- compliance methods in Condition 36. [40 CFR 63.802(b)(2)]
- 21.c. Limit HAP emission from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids (0.8 kg VOC/Kg solids), as applied. [40 CFR 63.802(b)(3)]
- 21.d. Limit formaldehyde emission by complying with the provisions specified in either Condition 21.d.i or 21.d.ii; [40 CFR 63.802(b)(4)]
- 21.d.i. Limit total formaldehyde ( $F_{total}$ ) use in coatings and contact adhesives to not more than 400 pounds per rolling 12-month period, or [40 CFR 63.802(b)(4)(i)]
- 21.d.ii. Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations. [40 CFR 63.802(b)(4)(ii)]
22. Applicable Requirement: At all times, the permittee must operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to the LRAPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.802(c)]
23. Applicable Requirement: *Work practice standards.* The permittee must comply with the work practices of Condition 23.a through 23.c. [40 CFR 63.803(a)]
- 23.a. The permittee subject to 40 CFR 63, Subpart JJ must prepare and maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture operation manufacturing operation and addresses each of the work practice standards presented in Condition 24 through 34. The plan must be developed no more than 60 days after the compliance date. [40 CFR 63.803(a)(1)]
- 23.b. The written work practice implementation plan must be available for inspection by LRAPA upon request. If LRAPA determines that the work practice implementation plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, LRAPA may require the affected source to modify the plan. Revisions or modification to the plan do not require a revision of this Title V permit. [40 CFR 63.803(a)(2)]
- 23.c. The inspection and maintenance plan required by Condition 25 and the formulation assessment plan for finishing operations required by Condition 34 are also reviewable by LRAPA. [40 CFR 63.803(a)(3)]
24. Applicable Requirement: *Operator training course.* The permittee must 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 requirements of 40 CFR 63, Subpart JJ. All new personnel, those hired after the compliance date of the standard, must be trained upon hiring. All existing personnel, those hired before the compliance date of the standard, must be trained within six (6) months of the compliance date of the standard. All personnel must be given refresher training annually. The affected source must maintain a copy of the training program with the work practice implementation plan. The training program must include, at a minimum, the following: [40 CFR 63.803(b)]
- 24.a. A list of all current personnel by name and job description that are required to be trained; [40 CFR 63.803(b)(1)]
- 24.b. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel; [40 CFR 63.803(b)(2)]
- 24.c. 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 [40 CFR 63.803(b)(3)]
- 24.d. A description of the methods to be used at the completion of initial or refresher training to



demonstrate and document successful completion. [40 CFR 63.803(b)(4)]

25. Applicable Requirement: Inspection and maintenance plan. The permittee must prepare and maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies: [40 CFR 63.803(c)]
  - 25.a. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents; [40 CFR 63.803(c)(1)]
  - 25.b. An inspection schedule; [40 CFR 63.803(c)(2)]
  - 25.c. Methods for documenting the date and results of each inspection and any repairs that were made; [40 CFR 63.803(c)(3)]
  - 25.d. The timeframe between identifying the leak and making the repair, which adheres, at a minimum, to the following schedule: [40 CFR 63.803(c)(4)]
    - 25.d.i. A first attempt at repair (e.g., tightening of packing glands) must be made no later than five (5) calendar days after the leak is detected; and [40 CFR 63.803(c)(4)(i)]
    - 25.d.ii. Final repairs must 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 must be completed within three (3) months. [40 CFR 63.803(c)(4)(ii)]
26. Applicable Requirement: Cleaning and washoff solvent accounting system. The permittee must develop an organic HAP solvent accounting form to record: [40 CFR 63.803(d)]
  - 26.a. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801; [40 CFR 63.803(d)(1)]
  - 26.b. The number of pieces washed off, and the reason for the washoff; and [40 CFR 63.803(d)(2)]
  - 26.c. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled onsite or disposed offsite. [40 CFR 63.803(d)(3)]
27. Applicable Requirement: Chemical composition of cleaning and washoff solvents. The permittee must not use cleaning or washoff solvents that contain any of the pollutants listed in 40 CFR 63, Subpart JJ – Table 4, in concentrations subject to MSDS reporting as required by OSHA. [40 CFR 63.803(e)]
28. Applicable Requirement: Spray booth cleaning. The permittee must 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, or plastic 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 affected source must 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. [40 CFR 63.803(f)]
29. Applicable Requirement: Storage requirements. The permittee must use normally closed containers for storing finishing, gluing, cleaning, and washoff materials. [40 CFR 63.803(g)]
30. Applicable Requirement: Application equipment requirements. The permittee must not use conventional air spray guns except when all emissions from the finishing application station are routed to a functioning control device. [40 CFR 63.803(h)]
31. Applicable Requirement: Line cleaning. The permittee must pump or drain all organic HAP solvent used for line cleaning into a normally closed container. [40 CFR 63.803(i)]
32. Applicable Requirement: Gun cleaning. The permittee must collect all organic HAP solvent used to clean spray guns into a normally closed container. [40 CFR 63.803(j)]
33. Applicable Requirement: Washoff operations. The permittee must control emissions from washoff operations by: [40 CFR 63.803(k)]
  - 33.a. Using normally closed tanks for washoff; and [40 CFR 63.803(k)(1)]
  - 33.b. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible. [40 CFR

63.803(k)(2)]

34. Applicable Requirement: Formulation assessment plan for finishing operations. The permittee must prepare and maintain with the work practice implementation plan, a formulation assessment plan that: [40 CFR 63.803(l)]
- 34.a. Identifies VHAP from the list presented in 40 CFR 63, Subpart JJ – Table 5, that are being used in finishing operations by the affected source; [40 CFR 63.803(l)(1)]
  - 34.b. Establishes a baseline level of usage by the affected source, for each VHAP identified in Condition 34.a. The baseline usage level must be the highest annual usage from 1994, 1995, or 1996, for each VHAP identified in Condition 34.a. 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 materials, when it is applied, by a factor of 0.16. Sources using a control device to reduce emission may adjust their usage based on the overall control efficiency of the control system, which determined using the equation in 40 CFR 63.805 (d) or (e). [40 CFR 63.803(l)(2)]
  - 34.c. Tracks the annual usage of each VHAP identified in Condition 34.a by the affected source that is present in amounts subject to MSDS reporting as required by OSHA. [40 CFR 63.803(l)(3)]
  - 34.d. If, after November 1998, the annual usage of the VHAP identified in Condition 34.a exceeds its baseline level, then the permittee of the affected source must 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 permittee from further action, unless the affected source is not in compliance with any State or Local regulations or requirements for that VHAP: [40 CFR 63.803(l)(4)]
    - 34.d.i. The exceedance is no more than 15.0 percent above the baseline level; [40 CFR 63.803(l)(4)(i)]
    - 34.d.ii. Usage of the VHAP is below the de minimis level presented in 40 CFR 63, Subpart JJ – Table 5, that VHAP (sources using a control device to reduce emissions may adjust their usage based on the overall control efficiency of the control system, which is determined using the procedures in 40 CFR 63.805(d) or (e); [40 CFR 63.803(l)(4)(ii)]
    - 34.d.iii. The affected source is in compliance with the State’s and LRAPA air toxic regulations or guidelines for the VHAP; or [40 CFR 63.803(l)(4)(iii)]
    - 34.d.iv. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 kg VOC/kg solids (1.0 lb VOC/lb solids), as applied. [40 CFR 63.803(l)(4)(iv)]
  - 34.e. If none of the above explanations are the reason for the increase, the permittee must 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 must 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 the LRAPA and permittee. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the permittee must develop a plan to reduce usage of the pollutant to the extent feasible. The plan must 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(l)(5)]
  - 34.f. If, after November 1998, an affected source uses a VHAP of potential concern listed in 40 CFR 63, Subpart JJ – Table 6, of which a baseline level has not been previously established, then the baseline level must be established as the de minimis level provided in the same table for the chemical. The affected source must track the annual usage of each VHAP of potential concern identified in this condition that is present in amounts subject to MSDS reporting as required by OSHA. If usage of the VHAP of potential concern exceeds the de minimis level listed in 40 CFR 63, Subpart JJ – Table

6, for that chemical, then the affected source must provide an explanation to LRAPA that documents the reason for the exceedance of the de minimis level. If the explanation is not one of those listed in Conditions 34.d.i through 34.d.iv, the affected source must follow the procedures in Condition 34.e. [40 CFR 63.803(l)(6)]

35. Monitoring Requirement: The permittee of a new affected source subject to Condition 21.a, may comply with those provisions by using Condition 35.a and 35.b: [40 CFR 63.804(d)]

35.a. Calculate the average VHAP content across all finishing materials used at the facility using the Equation 6, and maintain a value of E no greater than 0.08; [40 CFR 63.804(d)(1)]

**Equation 6:**

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

Where:

- E = Average emission limit of all finishing materials (lb VHAP/lb solids);
- $M_{cn}$  = The mass of solids in finishing material (c) used monthly (lb solid/month);
- $C_{cn}$  = The VHAP content of finishing material (c) (lb VHAP/lb solids);
- $S_n$  = The VHAP content, expressed as a weight fraction, of any solvents/thinners, added to the finishing materials participating in the averaging equation; and
- $W_n$  = The amount of solvent ( $S_n$ ), in pounds, added to the finishing materials during the monthly averaging period.

35.b. Use compliant finishing materials according to the following criteria: [40 CFR 63.804(d)(2)]

35.b.i. Demonstrate that each sealer and topcoat has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, each stain has a VHAP content of no more than 1.0 kg VHAP/kg solids (1.0 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; [40 CFR 63.804(d)(2)(i)]

35.b.ii. Demonstrate that each washcoat, basecoat, and enamel that is purchased pre-made, that is, it is not formulated onsite by thinning another finishing material, has a VHAP content of no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids), as applied, and each thinner contains no more than 10.0 percent VHAP by weight; and [40 CFR 63.804(d)(2)(ii)]

35.b.iii. Demonstrate that each washcoat, basecoat, and enamel that is formulated onsite is formulated using a finishing material containing no more than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solid) and a thinner containing no more than 3.0 percent HAP by weight. [40 CFR 63.804(d)(2)(iii)]

36. Monitoring Requirement: The permittee of a new affected source subject to Condition 21.b must comply with the provisions using Condition 36.a; [40 CFR 63.804(e)]

36.a. Use compliant contact adhesives with a VHAP content no greater than 0.2 kg VHAP/kg solids (0.2 lb VHAP/lb solids), as applied; [40 CFR 63.804(e)(1)]

37. Monitoring Requirement: *Continuous compliance demonstration.* The permittee must comply with continuous compliance demonstration by complying through the procedures established in of Condition 37.a through 37.f. [40 CFR 63.804(g)]

37.a. The permittee of an affected source subject to the provisions of Condition 21.a that comply through the procedures established in Condition 35.a must demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 6) for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(g)(1)]

37.a.i. The compliance certification must state that the value of (E), as calculated by Equation 6,

- is no greater than 0.8 kg VHAP/kg solids (0.8 lb VHAP/lb solids) for new sources 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 affected source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period. [40 CFR 63.804(g)(1)(i)]
- 37.a.ii. The compliance certification must be signed by a responsible official of the company the permittee of the affected source. [40 CFR 63.804(g)(1)(ii)]
- 37.b. The permittee of an affected source subject to the provisions of Condition 21.a that comply through the procedures established in Condition 35.b must demonstrate continuous compliance by using complaint coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(g)(2)]
- 37.b.i. The compliance certification must state that compliant stains, washcoats, sealers, topcoats, basecoats, enamels, and thinners, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used. [40 CFR 63.804(g)(2)(i)]
- 37.b.ii. The compliance certification must be signed by a responsible official of the company that is permitted. [40 CFR 63.804(g)(2)(ii)]
- 37.c. The permittee subject to the provisions of 21.a that are complying through the procedures established in Condition 35.b and are applying coatings using continuous coaters must demonstrate continuous compliance by following the procedures in Conditions 37.c.i through 37.c.ii. [40 CFR 63.804(g)(3)]
- 37.c.i. Using compliant coatings, as determined by the VHAP content of the coating in the reservoir and the VHAP content as calculated from records, using compliant thinners, and submitting a compliance certification with the semiannual report required in Condition 48. [40 CFR 63.804(g)(3)(i)]
- 37.c.i.1.A. The compliance certification must state that compliant coatings have been used each day in the semiannual reporting period or should otherwise identify the days of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a noncompliant coating, as determined by records or by a sample of the coating, is used. Use of a noncompliant coating is a separate violation for each day the noncompliant coating is used. [40 CFR 63.804(g)(3)(i)(A)]
- 37.c.i.1.B. The compliance certification must be signed by a responsible official of the company permitted. [40 CFR 63.804(g)(3)(i)(B)]
- 37.c.ii. Using compliant coatings, as determined by the VHAP content of the coating in the reservoir, using complaint thinners, maintaining a viscosity of the coating in the reservoir that is no less than the viscosity of the initial coating by monitoring the viscosity with a viscosity meter or by testing the viscosity of the initial coating and retesting the coating in the reservoir each time solvent is added, maintaining records of solvents additions, and submitting a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(g)(3)(ii)]
- 37.c.ii.1.A. The compliance certification must state that compliant coatings, as determined by the VHAP content of the coating in the reservoir, have been used each day in the semiannual reporting period. Additionally, the certification must state that the viscosity of the coating in the reservoir has not been less than the viscosity of the initial coating, that is the coating that is initially mixed and placed in the reservoir, for any day in the semiannual reporting period. [40

CFR 63.804(g)(3)(ii)(A)]

- 37.c.ii.1.B. The compliance certification must be signed by a responsible official of the company that is permitted. [40 CFR 63.804(g)(3)(ii)(B)]
- 37.c.ii.1.C. An affected source is in violation of the standard when a sample of the as-applied coating exceeds the applicable limit established in Condition 35.b, as determined using EPA Method 311, or the viscosity of the coating in the reservoir is less than the viscosity of the initial coating. [40 CFR 63.804(g)(3)(ii)(C)]
- 37.d. The permittee subject to the provisions of Condition 21.b (contact adhesives) that comply through the procedures established in Condition 36.a, must submit a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(g)(5)]
  - 37.d.i. The compliance certification must state that compliant contact and/or foam adhesives have been used each day in the semiannual 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. [40 CFR 63.804(g)(5)(i)]
  - 37.d.ii. The compliance certification must be signed by a responsible official of the company permitted. [40 CFR 63.804(g)(5)(ii)]
- 37.e. The permittee subject to the provisions of Condition 21.c (strippable spray booth coatings) must submit a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(g)(7)]
  - 37.e.i. The compliance certification must state that the compliant strippable spray booth coatings have been used each day in the semiannual reporting period or should otherwise identify each day noncompliant materials were used. Each day a noncompliant strippable booth coating is used is a single violation of the standard. [40 CFR 63.804(g)(7)(i)]
  - 37.e.ii. The compliance certification must be signed by the responsible official of the company permitted. [40 CFR 63.804(g)(7)(ii)]
- 37.f. The permittee subjected to the work practice standards in Conditions 23 through 34 must submit a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(g)(8)]
  - 37.f.i. The compliance certification must 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 provision 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)(i)]
  - 37.f.ii. The compliance certification must be signed by the responsible official of the company permitted. [40 CFR 63.804(g)(8)(ii)]
- 38. Monitoring Requirement: The permittee of a new affected source subject to Condition 21.d must comply with those provisions by using either of the methods presented in Condition 38 if comply with Condition 21.d.i or by using the method presented in Condition 38.b if complying with Condition 21.d.ii. [40 CFR 63.804(h)]
  - 38.a. Calculate total formaldehyde emissions from all finishing materials and contact adhesives used at the facility using Equation 7 and maintain a value of  $F_{total}$  no more than 400 pounds per rolling 12-month period. [40 CFR 63.804(h)(1)]

**Equation 7:**

$$F_{total} = (C_{f1} V_{c1} + C_{f2} V_{c2} + *** + C_{fn} V_{cn} + G_{f1} V_{g1} + G_{f2} V_{g2} + *** + G_{fn} V_{gn})$$

Where:

- $F_{total}$  = Average emission limit of all finishing materials (lb VHAP/lb solids);  
 $C_{cn}$  = The VHAP content of finishing material (c) (lb VHAP/lb solids);  
 $V_{cn}$  = The volume of formaldehyde-containing finishing material (c) (gal);  
 $G_{fn}$  = The VHAP content of a contact adhesive (lb VHAP/lb solids) as applied; and  
 $V_{gn}$  = The volume of formaldehyde-containing contact adhesive (g) (gal).

- 38.b. Demonstrate compliance by use of coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives maintaining a certified product data sheet for each coating and contact adhesive used, as required by Condition 40.a, and submitting a compliance certification with the semiannual report required by Condition 48. [40 CFR 63.804(h)(3)]
- 38.b.i. The compliance certification must state that low-formaldehyde coatings and contact adhesives, as applicable, have been used each day in the semiannual reporting period or should otherwise identify the periods of noncompliance and the reasons for noncompliance. An affected source is in violation of the standard whenever a coating or contact adhesive that is low-formaldehyde, as demonstrated by records or by a sample of the coating or contact adhesive, is used. Use of a noncompliant coating or contact adhesive is a separate violation for each day the noncompliant coating or contact adhesive is used. [40 CFR 63.804(h)(3)(i)]
- 38.b.ii. The compliance certification must be signed by the responsible official of the company permitted. [40 CFR 63.804(h)(3)(ii)]
39. Testing Requirement: The permittee must comply with 40 CFR 63.805, as applicable. [40 CFR 63.805(a)]
- 39.a. The EPA Method 311 of appendix A of 40 CFR 63 must be used in conjunction with formulation data to determine the VHAP content of the liquid coating. Formulation data must be used to identify VHAP present in the coating. The EPA Method 311 must then be used to quantify those VHAP identified through formulation data. The EPA Method 311 must not be used to quantify HAP such as styrene and formaldehyde that are emitted during the cure. The EPA Method 24 (40 CFR 60, appendix A) must be used to determine the solids content by weight and the density of coatings. If it is demonstrated to the satisfaction of LRAPA that a coating is solvent, then batch formulation information must be accepted. The permittee of an affected source may request approval from LRAPA to use an alternative method for determining the VHAP content of the coating. In the event of any inconsistency between the 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 must govern unless after consultation, a regulated source could demonstrate to the satisfaction of LRAPA that the formulation data were correct. Sampling procedures must 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*," EPA-340/1-91-010 (Docket No. A-93-10, Item No. IV-A-1). [40 CFR 63.805(a)(1)]
- 39.b. Performance tests must be conducted under such conditions as LRAPA specifies to the permittee based on representative performance of the affected source for the period being tested. Upon request, the permittee must make available to LRAPA such records as may be necessary to determine the conditions of performance tests. [40 CFR 63.805(a)(2)]
40. Recordkeeping Requirement: The permittee subject to the emission limits in Condition 21 must maintain records of the following: [40 CFR 63.806(b)]
- 40.a. A certified product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Condition 21; and [40 CFR 63.806(b)(1)]
- 40.b. The VHAP content, in lb VHAP/lb solids, as applied, of each finishing material and contact adhesive subject to the emission limits of Condition 21; and [40 CFR 63.806(b)(2)]

- 40.c. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Condition 21.c. [40 CFR 63.806(b)(3)]
- 40.d. The formaldehyde content, lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits in Condition 21.d and chooses to comply with the 400 lb/yr limits on formaldehyde in Condition 21.d.i. [40 CFR 63.806(b)(4)]
- 41. Recordkeeping Requirement: The permittee following the compliance method in Condition 35.a must maintain copies of the averaging calculation for each month following the compliance date, as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 6. [40 CFR 63.806(c)]
- 42. Recordkeeping Requirement: The permittee following the compliance procedures of Condition 37.c.ii must maintain the records required by Condition 40 as well as records of the following: [40 CFR 63.806(d)]
  - 42.a. Solvent and coating additions to the continuous coater reservoir; [40 CFR 63.806(d)(1)]
  - 42.b. Viscosity measurements; and [40 CFR 63.806(d)(2)]
  - 42.c. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance. [40 CFR 63.806(d)(3)]
- 43. Recordkeeping Requirement: The permittee subject to the work practice standards in Conditions 23 through 34 must maintain onsite the work practice implementation plan and all records associated with fulfilling the requirements of that plan, including but not limited to: [40 CFR 63.806(e)]
  - 43.a. Records demonstrating that the operator training program required by Condition 24 is in place; [40 CFR 63.806(e)(1)]
  - 43.b. Records collected in accordance with the inspection and maintenance plan required by Condition 25; [40 CFR 63.806(e)(2)]
  - 43.c. Records associated with the cleaning solvent accounting system required by Condition 26; [40 CFR 63.806(e)(3)]
  - 43.d. Records associated with the formulation assessment plan required by Condition 34; and [40 CFR 63.806(e)(5)]
  - 43.e. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed. [40 CFR 63.806(e)(6)]
- 44. Recordkeeping Requirement: The permittee subject to the emission limits in Conditions 23 through 34 and Conditions 37.a through 37.f must maintain records of the compliance certifications submitted in accordance in Condition 48 for each semiannual period following the compliance date. [40 CFR 63.806(h)]
- 45. Recordkeeping Requirement: The permittee must maintain records of the all other information submitted with the compliance status report required by 40 CFR 63.9(h) and the semiannual reports required by Condition 48. [40 CFR 63.806(i)]
- 46. Recordkeeping Requirement: The permittee must maintain all records in accordance with the requirements of 40 CFR 63.10(b)(1). [40 CFR 63.806(j)]
- 47. Recordkeeping Requirement: The permittee must maintain records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control equipment and monitoring equipment. The permittee must maintain records of action taken during periods of malfunction to minimize emissions in accordance with Condition 22, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.806(k)]
- 48. Reporting Requirement: The permittee demonstrating compliance in accordance with Conditions 37.a through 37.f, 38.a and 38.b must submit a report covering the previous 6 months of wood furniture manufacturing operations. [40 CFR 63.807(c)]
  - 48.a. The semiannual reports must include the information required by Conditions 37.a through 37.f, 38.a

and 38.b, a statement of whether the affected source was in compliance or noncompliance, and, if the affected source into compliance. If there was a malfunction during the reporting period, the report must also include the number, duration and a brief description for each type of malfunction which occurred during the reporting period and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by a permittee during a malfunction of an affected source to minimize emissions in accordance with Condition 25, including actions taken to correct a malfunction. [40 CFR 63.807(c)(3)]

- 48.b. The frequency of the reports required by Condition 48 must not be reduced from semiannually regardless of the history of the permittee’s compliance status. [40 CFR 63.807(c)(4)]
49. **Reporting Requirement:** The permittee required to provide a written notification under Condition 34.d must include in the notification one or more statements that explains the reasons for the usage increase. The notification must be submitted no later than 30 calendar days after the end of the annual period in which the usage increased occurred. [40 CFR 63.807(e)]

**VOC – Best Available Control Technology (BACT) for Surface Coaters (EU-2)**

50. **Applicable Requirement: VOC content limit for BACT:** The permittee must limit monthly average VOC emissions (lb VOC/lb solids) from Emission Unit Surface Coaters (EU-2) to less than or equal to the levels set forth in Table 8. [LRAPA 38-0070-(2)]

**Table 8: VOC BACT Emission Limits**

Coating Type	Allowable Monthly Average (lb VOC/lb Solids)
<u>Finishing operations</u> Waterborne Topcoats	0.8
<u>Higher solids sealer and topcoats</u>	
Sealers	1.9
Topcoats	1.8
Acid-cured alkyd amino vinyl Sealer	2.3
Acid-cured alkyd amino conversion Varnish Topcoats	2.0

51. **Monitoring Requirement: By the 15<sup>th</sup> of each month** the permittee must monitor compliance with the allowable monthly VOC average in Condition 50 by using the calculation provided in Condition 51.a. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]

- 51.a. The permittee must calculate the average monthly VOC content as applied, less water and exempt compounds, for all material used in the surface coaters (EU-2) using the Equation 8 and maintain a value of  $M_{VOCWT}$  no greater than that in Table 8.

**Equation 8:**

$$M_{VOCWT} = M_{VOC} / (D_{COAT} * D_{SOL})$$

Where:

$M_{VOCWT}$  = Average Monthly weight fraction of VOC in coating, less water and Exempt Compounds (lb VOC/lb solids);

$M_{VOC}$  = VOC content of coatings, minus water and exempt solvents (lb VOC/lb solids);

$D_{COAT}$  = Density of coating (lb coating/gal coating); and

$D_{SOL}$  = Solids density of coating (lb solids/lb coating).



52. **Monitoring and Recordkeeping Requirements:** *By the 15<sup>th</sup> of each month* the permittee must demonstrate continuous compliance with the VOC limits in Condition 50. The records must include, but are not limited to, the following: [LRAPA 34-016 and OAR 340-218-0050(3)(a) and (b)]
- 52.a. The permittee must maintain records on the type, quantity, density, VOC and solids content of all adhesives, coating (including catalyst and reducers), sealers, topcoats, and solvent used in the emissions calculations in Condition 51.a.
- 52.b. The permittee must maintain records of all Certified Product Data Sheet (CPDS), Materials Safety Data Sheet (MSDS), or Safety Data Sheet (SDS) for each adhesive, coating (including catalyst and reducers), sealer, topcoat, and solvent used. If the CPDS, MSDS, or SDS provide a range of values for volatile percent or VOC content, the highest value must be used in the emission calculation in Condition 51.a.
- 52.c. The permittee must comply with continuous compliance demonstration of Condition 50 through the procedure established in Condition 51.a by submitting the results of the averaging calculations using Equation 8 in Condition 51.a for each month within that semiannual period and submitting a compliance certification with the semiannual report required by Condition 75.

**Insignificant Activities Emission Limits and Standards**

**Table 9: Insignificant Activity Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
LRAPA 32-010(3)	53	Visible Emissions	20% opacity, 6 minutes	VE Periodic Monitoring	54
LRAPA 32-015(2)	53	PM	0.10 gr/dscf	VE Periodic Monitoring	54
LRAPA 32-045	53	PM	Process Weight	VE Periodic Monitoring	54

53. **Applicable Requirement(s):** LRAPA acknowledges that insignificant emission units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emission [LRAPA Title 12 and OAR 340-200-0020] exist at facilities required to obtain a LRAPA Title V Operating Permit. IEUs must comply with the applicable requirement. In general, the requirements that could apply to IEUs are incorporated as follows:
- 53.a. LRAPA 32-010(3) (20% opacity)
- 53.b. LRAPA 32-015(2) (0.14 gr/dscf for non-fugitive, non-fuel burning process equipment)
- 53.c. LRAPA 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment)
54. **Testing, Monitoring, and Recordkeeping Requirement:** Unless otherwise specified in this permit or an applicable requirement LRAPA is not requirement any testing, monitoring, recordkeeping, or reporting for the applicable emissions 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 LRAPA Title 12 and perform the testing in accordance with the DEQ’s *Source Sampling Manual*.

## EMISSION FEES

55. Emission fees will be based on the Plant Site Emission Limits, unless the permittee elects to report actual emission for one or more permitted processes/pollutants. [LRAPA 34-180 and OAR 340-220-0090]

## GENERAL TESTING REQUIREMENTS

56. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ's *Source Sampling Manual*. [LRAPA 35-0120 and 40 CFR 60.8(d) and (f)]
- 56.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with DEQ's *Source Sampling Manual* and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
- 56.b. 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.
- 56.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source test must be performed as follows:
- 56.c.i. At levels that equal or exceed 90% of the design capacity for initial performance tests on new or modified equipment; or
- 56.c.ii. At least levels that equal or exceed 90% of the normal maximum operating rate for existing equipment; or
- 56.c.iii. For purposes of this permit, the normal maximum operating rate is defined as no less than the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report. Average hourly operating rates can be determined by taking daily operating data and dividing by the number of hours of operation.
- 56.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 56.e. Source testing reports prepared in accordance with DEQ's *Source Sampling Manual* must be submitted to LRAPA within 45 days of completing any required source test, unless a different time period is approved in the source test submitted prior to the source test.

## GENERAL MONITORING REQUIREMENTS [OAR 340-218-0050(3)(a)]

57. The permittee must not knowingly render inaccurate any required monitoring device or methods. [OAR 340-218-0050(3)(a)(E)]
58. The permittee must use the same methods used to determine compliance as those used to determine actual emissions for fee purposes and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
59. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

## GENERAL RECORDKEEPING REQUIREMENTS

60. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]
  - 60.a. The date, place as defined in the permit, and time of sampling or measurements;
  - 60.b. The date(s) analyses were performed;
  - 60.c. The company or entity that performed the analyses;
  - 60.d. The analytical techniques or methods used;
  - 60.e. The results of such analyses;
  - 60.f. The operating conditions as existing at the time of sampling or measurement; and
  - 60.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
61. Unless otherwise specified by permit condition, the permittee must 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) must not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods 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 required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information must not be considered a missing record. [LRAPA 35-0160, OAR 340-214-0114, and 340-218-0050(3)(b)]
62. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
63. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of as least five (5) years for the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-charts recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contamination Discharge Permit or LRAPA Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample measurement, report or application. [OAR 340-218-0050(3)(b)(B)]

## SPECIFIC RECORDKEEPING REQUIREMENTS

64. The permittee must maintain the following specific records of testing and monitoring required by this permit: [LRAPA 34-015 and LRAPA 34-016]  
Facility-wide:
  - 64.a. Record of fugitive particulate emissions inspections and corrective actions required by Condition 5.
  - 64.b. Records of fugitive emissions surveys and corrective actions (if necessary), and Modified EPA Method 9 (EPA Method 203B) test as required by Conditions 5.a and 5.b.
  - 64.c. Nuisance Complaint Log as required by Condition 6.
  - 64.d. Inspection and Maintenance Plan equipment inspection log including corrective actions as required

by Condition 8.

Plant Site Emission Levels:

- 64.e. Plant Site Emission Limits recordkeeping as required by Condition 12.
  - 64.e.i. Monthly baghouse material throughput of the Sawdust Handling System (EU-1).
  - 64.e.ii. Monthly for each coating, solvent, adhesive, and offsite sludge disposal:
    - 64.e.ii.1. Quantity in gallons;
    - 64.e.ii.2. Density in pounds per gallon; and
    - 64.e.ii.3. VOC content in percent by weight.
  - 64.e.iii. Monthly natural gas usage in therms.

Sawdust Handling System – EU-1:

- 64.f. Survey log of all visible emission surveys and corrective action taken, if needed, as required by Conditions 16 and 18.
- 64.g. Maintenance log for the baghouse as required by Condition 16.b.

NESHAP Subpart JJ – Surface Coaters – EU-2:

- 64.h. Finishing operations recordkeeping as required by Condition 40, 41 and 42:
  - 64.h.i. MSDS, CPDS, or SDS for each finishing material, thinner, contact adhesive, and strippable booth coating to the emissions limits to Condition 21.a;
  - 64.h.ii. VHAP content in pounds VHAP per pounds solids for each material subject to Condition 21.b;
  - 64.h.iii. HAP content in pound HAP per pounds solid of each strippable booth coating subject to Condition 21.c;
  - 64.h.iv. Formaldehyde content pound per gallon of finishing material and contact adhesive subject to Condition 21.d.
  - 64.h.v. Monthly copies of the averaging calculations and the data on the quantity of coatings and thinners used to support the calculations of Conditions 35.a and 21.a.
  - 64.h.vi. Compliance procedures for finishing operation in Condition 21.a:
    - 64.h.vi.1. Solvent and coating additions to the continuous coater reservoir;
    - 64.h.vi.2. Viscosity measurements; and
    - 64.h.vi.3. Data demonstrating that viscosity is an appropriate parameter for demonstrating compliance.
- 64.i. Work practice standards recordkeeping as required by Condition 43:
  - 64.i.i. Records demonstrating that the operator training program required by Condition 24 is in place;
  - 64.i.ii. Records collected in accordance with the inspection and maintenance plan required by Condition 25;
  - 64.i.iii. Records associated with the cleaning solvent accounting system required by Condition 26;
  - 64.i.iv. Records of chemical composition of cleaning and washoff solvents as required in Condition 27;
  - 64.i.v. Records demonstrating that compounds containing 0.8 percent by weight or less of VOC were used for cleaning spray booth components other than conveyors, continuous coaters

- and their enclosures, or metal filters or plastic filters unless the spray booth is being refurbished, and if the booth is being refurbished, records demonstrating the did not use more than 1.0 gallon of organic HAP solvent per booth to prepare the surface of the booth prior to applying the booth coating as required in Condition 28;
- 64.i.vi. Certification demonstrating that normally-closed containers are used for storing finishing, gluing, cleaning and washoff materials required by Condition 29;
  - 64.i.vii. Certification demonstrating that conventional air spray guns are not used except when all emissions from the finishing application station are routed to a functioning control device as required by Condition 30;
  - 64.i.viii. Certification demonstrating that all HAP solvent used for line cleaning are pumped or drained into a normally closed container as required by Condition 31;
  - 64.i.ix. Certification demonstrating that all HAP solvent used for spray guns are collected in a normally closed container as required in Condition 32;
  - 64.i.x. Certification demonstrating is controlling emission from washoff operations by using normally closed tanks and minimizing dripping as required by Condition 33;
  - 64.i.xi. Records associated with the formulation assessment plan required by Condition 34; and
  - 64.i.xii. Copies of documentation such as logs developed to demonstrate that the other provisions of the work practice implementation plan are followed.
- 64.j. The permittee must maintain records of compliance certification for Conditions 23 through 34 and 37.a through 37.f submitted in accordance with Condition 71 and 73 for each semi-annual period required in Condition 44.

VOC BACT - Surfaces Coaters – EU-2:

- 64.k. Monthly VOC continuous compliance calculations with supporting data as required by Conditions 51 and 52.
- 64.k.i. Monthly BACT compliance calculations for each category set forth in Table 8.
  - 64.k.ii. Type, quantity, density, VOC and solids content of all adhesives, coating (including catalyst and reducers), sealers, topcoats, and solvent in gallons.
  - 64.k.iii. All related MSDS, CPDS, and/or SDS for each individual adhesive, coating (including catalyst and reducers), sealer, topcoat, and solvent supporting the calculations of Conditions 51.a.
65. When the same monitoring data is required by more than one condition, the permittee does not need to keep duplicate records provided that the data is clearly cross referenced to the underlying requirements and as long as the data clearly supports the specific recordkeeping requirement.

**REPORTING REQUIREMENTS [OAR 340-218-0050(3)(c)]**

66. Excess Emissions Reporting: The permittee must report all excess emissions in accordance with LRAPA 36-001 through 36-030. In summary, the permittee must immediately (i.e., as soon as possible but in no case more than one hour after the beginning of the excess emission period) notify LRAPA by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance. Notification must, to the extent reasonably ascertainable at the time of notification, include the source name, nature of the emissions problem, name of the person making the report, name and telephone number of the contact person for further information, date and time of the onset of the upset condition, whether or not the incident was planned, the cause of the excess emission (e.g., startup, shutdown, maintenance, breakdown, or other), equipment involved in the upset, estimated type and quantity of excess emissions, estimated time of return to normal operations, efforts made to minimize emissions, and a description of remedial actions to be taken. Follow-up reporting must be made in accordance with LRAPA direction and LRAPA 36-020 and

LRAPA 36-025. [LRAPA 36-001 through 36-030]

- 66.a. Notification must be made to LRAPA. The current LRAPA telephone number is **541-736-1056**.
- 66.b. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is **1-800-452-0311**.
- 66.c. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required in LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
- 66.d. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.
- 66.e. The permittee must maintain and submit to LRAPA a log of planned and unplanned excess emissions, on LRAPA approved forms, in accordance with LRAPA 36-025. However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
- 67. **Permit Deviation Reporting:** The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" is defined in OAR 340-218-0050(3)(c)(B) as 15 days. Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with Condition 61. [OAR 340-218-0050(3)(c)(B)]
- 68. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
- 69. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
- 70. **Greenhouse Gas Registration and Reporting:** If the calendar year emission rate of greenhouse gases (CO<sub>2</sub>e) is greater than or equal to 2,756 tons (2,500 metric tons including both biogenic and anthropogenic), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5). [OAR 340-215-0040]

Addresses of regulatory agencies are the following, unless otherwise instructed:

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

Part 70 Operating Permit Program  
U.S. EPA Region 10, Mail Stop: OAW-150  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

## SEMI-ANNUAL AND ANNUAL REPORTS

71. The permittee must submit three (3) copies of the semi-annual monitoring report, using LRAPA-approved forms, covering the period January 1 to June 30 **by August 30**, and covering the period July 1 to December 31 **by March 15**, unless otherwise approved in writing by LRAPA. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. The semi-annual monitoring report must include the semi-annual compliance certification: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 71.a. The semi-annual report is **due on August 30** and must include:
- 71.a.i. The semi-annual compliance certification and compliance report for the January 1<sup>st</sup> through June 30<sup>th</sup> as set forth in Condition 73 per OAR 340-218-0080;
  - 71.a.ii. PSEL compliance summary as required by Condition 73.g; [LRAPA 34-016]
  - 71.a.iii. The semi-annual NESHAP report as set forth in Condition 74; and [40 CFR 63.807]
  - 71.a.iv. The semi-annual Best Available Control Technology (BACT) report as set forth in Conditions 75. [LRAPA 34-016]
- 71.b. The annual report must include the second semi-annual report is **due on March 15** and must consist of the following:
- 71.b.i. the semi-annual compliance certification for the second half of the calendar year as set forth in Condition 73; [OAR 340-218-0080]
  - 71.b.ii. PSEL compliance summary as required by Condition 73.g; [LRAPA 34-016]
  - 71.b.iii. the semi-annual NESHAP report for the second half of the calendar year as set forth in Condition 74; [40 CFR 63.807]
  - 71.b.iv. The semi-annual Best Available Control Technology (BACT) report for the second half of the calendar year as set forth in Condition 75; [LRAPA 34-016]
  - 71.b.v. The annual report requirements set forth in Condition 72.
  - 71.b.vi. The excess emissions upset log; and [OAR 340-214-0340]
  - 71.b.vii. Parameters and calculations required by Condition 64. [LRAPA 34-016]

### Annual Report

72. Annual report requirements shall include the following:
- 72.a. The emission fee report; [OAR 340-220-0100]
  - 72.b. The annual certification that the risk management plan is being properly implemented, or a statement that the risk management plan is not applicable, see Condition 9. [40 CFR Part 68]
  - 72.c. A summary of all major maintenance performed on air pollution equipment per Conditions 8 and 16; [LRAPA 34-016 and OAR 340-218-0050(3)(c)]
  - 72.d. A summary of visible emission events and corrective actions taken recorded during the plant-wide and EU-1 visible emission survey required by Conditions 5 and 17. [OAR 340-218-0050(3)(c)]
  - 72.e. Upon the request of LRAPA, any other data necessary to demonstrate compliance with applicable requirements. [OAR 340-218-0050(3)(c)]

### Semi-Annual Report

73. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0050(3)(c)(A)]
- 73.a. The identification of each term or condition of the permit that is the basis of the certifications;

- 73.b. the identification of the method(s) or other means used by the permittee for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the permittee also must identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
- 73.c. the status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in OAR 340-218-0080(6)(c)(B). The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred;
- 73.d. annual amount of natural gas combusted in therms per Condition 11;
- 73.e. annual (12-month rolling period) baghouse throughput in tons, see Condition 12.a;
- 73.f. monthly summary of all VOC and VHAP containing wastes shipped offsite, including annual tests results to verify the VOC/HAP content (gallons, pounds of VOC/gallon, VHAP/gallon, total VOC, and total VHAP, per Conditions 12.a and 40.
- 73.g. annual VOC emissions for each 12-month rolling calendar month period ending in the reporting period calculated as shown in Condition 12, along with an example of calculation cross-referenced to material usage data.
- 73.h. the excess emissions upset log per Condition 66.e;
- 73.i. a summary of nuisance (fugitive particulate matter and/or odor) complaints received; and
- 73.j. such other fact as LRAPA may require to determine the compliance status of the source;

#### NESHAP Semi-Annual Report

- 74. The permittee must submit a semi-annual and annual continuous NESHAP compliance demonstration report covering the previous 6 months of wood furniture manufacturing operations. The report must include the following: [40 CFR 63.804(c)]
  - 74.a. The semi-annual reports must include a statement of whether the source was in compliance or noncompliance. The facility must submit the following information and if the facility was in noncompliance the report must include the measures taken to bring the facility into compliance.
    - 74.a.i. As required in Condition 37, if complying with the provisions of Condition 21 (VHAP limits) through the procedures established in Condition 35.a, the permittee must demonstrate continuous compliance by submitting the results of the averaging calculation (Equation 6) for each month within the semiannual period and submitting a compliance certification with the semiannual period and submitting a compliance certification with the semi-annual report. The compliance certification must state that the value of (E), as calculated by Equation 6, of Condition 35.a is no greater than 0.8 lb VHAP/lb solids for existing sources. The permittee is in violation of the standard if E is greater than 0.8 lb VHAP/lb solids for existing sources 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 source can demonstrate through records that the violation of the monthly average can be attributed to a particular day or during the period.
    - 74.a.ii. As required by Condition 37, if complying with the provisions of Condition 21 (VHAP



limits) through the procedures established in Condition 35.b, the permittee must demonstrate continuous compliance by using compliant finishing materials, maintaining records that demonstrate the finishing materials are compliant, and submitting a compliance certification with the semi-annual report. The compliance certification must 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. The permittee is in violation whenever a noncompliant coating, as demonstrated by records or by a sample of the coating, is used.

- 74.a.iii. If complying with the provisions of Condition 21 (VHAP limits for finishing materials) through the procedures established in Condition 35.b and using a continuous coater, the permittee must demonstrate continuous compliance in accordance with Condition 37.c.
- 74.a.iv. As required by Condition 37.d, if complying with the provisions of Condition 21.b (VHAP limits for Contact Adhesives) through the procedures established in Condition 36, the permittee must submit a compliance certification with the semiannual report. The compliance certification must state that compliant contact and/or foam adhesives have been used each day in the semiannual reporting period or should otherwise identify each day non-compliant contact and/or foam adhesives were used. Each day a non-compliant contact and/or foam adhesive is used is a single violation.
- 74.a.v. As required by Condition 37.e, in complying with the provisions of Condition 21.c (VHAP limits for Strippable Spray Booth Coatings), the permittee must submit a compliance certification with the semiannual report. The compliance certification must state that complaint strippable spray booth coatings have been used day in the semiannual reporting period or should otherwise identify each day non-compliant material were used. Each day a non-compliant strippable booth coating is used is a single violation.
- 74.a.vi. As required by Condition 37.f, in complying with the provisions of Conditions 23 through 34, the permittee must submit a compliance certification with the semiannual report. The compliance certification must state that the work practice standards required by Conditions 23 through 34 are 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)]
- 74.b. The permittee must demonstrate continuous compliance per Condition 48 for the previous 6 months. The permittee must report whether the affected source was in compliance or noncompliance during the reporting period. If there were any malfunctions, the permittee must report the duration of the malfunction, briefly describe each type of malfunction, whether it caused any applicable emission limitation to be exceeded, and what action where taken to minimize emissions and to correct the malfunction. These must be supplied semiannually. [40 CFR 63.807(c)]
- 74.c. The permittee may not reduce the frequency of the reports required by Condition 48 from semiannually regardless of the history of the permittee's compliance status. [40 CFR 63.807(c)(4)]
- 74.d. As required by Condition 48, the permittee must provide written notification that explains the reasons for the increase to usage, the amount of the increase and explain the reasons for the exceedance of the baseline level. [40 CFR 63.807(e)]

#### Best Available Control Technology (BACT) Report

- 75. The permittee must submit a semi-annual and annual Best Available Control Technology report. The report must include the following:
  - 75.a. Type and amount of coating, adhesive, and solvents used (gal/month) on a monthly basis, with weight per gallon, percent VOC by weight, and solids content (lb solids/gal Coating) basis by coating type, for each coating type listed in Condition 50.

- 75.b. Monthly summary of VOC emission in pounds of VOC per pound of solids for each coating type listed in Condition 50 with supporting example calculation and crossed referenced to supporting data; and
- 75.c. Summary of exceedance; If none, so state.

**General**

- 76. If there are any changes to information provided in the Initial Compliance Status Report received by LRAPA on August 30, 1999, then the permittee must provide information about the change in writing to LRAPA and EPA within 15 calendar days after the change has occurred. [40 CFR 63.9(j)]
- 77. Notwithstanding any other provision contained in any applicable requirement, the permittee may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

**NON-APPLICABLE REQUIREMENTS**

- 78. The following Federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110]

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 60, Subpart Dc	Standard of Performance for Industrial-Commercial-Institutional Steam Generating Units	The facility is not subject to this NSPS because the facility's boiler is under 2.9 MW (10 MMBtu/hr) threshold
40 CFR Part 60, Subpart EE	Standards of Performance for Surface Coating of Metal Furniture	The facility is not subject to this NSPS because the facility does not surface coat metal furniture
40 CFR Part 60, Subpart SS	Standards of Performance for Industrial Surface Coating: Large Appliances	The facility is not subject to this NSPS because the facility does not surface coat large appliances
40 CFR Part 60, Subpart TT	Standards of Performance for Metal Coil Surface Coating	The facility is not subject to this NSPS because the facility does not surface coat metal coil
40 CFR Part 63, Subpart MMMM	National Emission Standards for Organic Hazardous Air Pollutants for Surface Coating of Miscellaneous Metal Parts and Products	The facility is not subject to this NESHAP because the facility does not surface coat miscellaneous metal parts.
40 CFR Part 63, Subpart NNNN	National Emission Standards for Organic Hazardous Air Pollutants for Surface Coating of Large Appliances	The facility is not subject to this NESHAP because the facility does not surface coat large appliances
40 CFR Part 63, Subpart PPPP	National Emission Standards for Organic Hazardous Air Pollutants for Surface Coating of Plastic Parts and Products	The facility is not subject to this NESHAP because the facility does not surface coat plastic parts and products
40 CFR Part 63, Subpart QQQQ	National Emission Standards for Organic Hazardous Air Pollutants for Surface Coating of Wood Building Products	The facility is not subject to this NESHAP because the facility does not surface wood building products
40 CFR Part 63, Subpart RRRR	National Emission Standards for Organic Hazardous Air Pollutants for Surface Coating of Metal Furniture	The facility is not subject to this NESHAP because the facility does not surface coat metal furniture
40 CFR Part 63, Subpart SSSS	National Emission Standards for Organic Hazardous Air Pollutants for Surface	The facility is not subject to this NESHAP because the facility does

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 63, Subpart HHHHHH	Coating of Metal Coil National Emission Standards for Organic Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operation at Area Source	not surface coat metal coil The facility is not subject to this NESHAP because the facility is not an area source

BAE/cmw  
7/29/2019

## GENERAL CONDITIONS

### G1. General Provision

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

### G2. Reference Materials

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

- a. Source Sampling Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 - 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. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

### G4. 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.

### G5. Masking Emissions

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 49-040] This condition is enforceable only by LRAPA.

G6. 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. [LRAPA 34-017]

G7. 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 must contain certification by a responsible official of truth, accuracy and completeness. All certifications must 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 must promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G8. Outdoor Burning [LRAPA Title 47]

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

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0200 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee must comply with OAR 340-248-0200 through 340-248-0280, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

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

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit is 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 alters or affects the following:
  - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
  - ii. the 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. the applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
  - iv. the 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.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow the Lane Regional Air Protection Agency, 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 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.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must 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 must 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 must be submitted in writing to LRAPA. Payment must be made regardless of the dispute. User-based fees must be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee must 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 LRAPA Title 12.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to LRAPA and the EPA.
- c. The permittee must 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 G11 must not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must 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 must be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G11 must not extend to Section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must 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.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, 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.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source of air pollution control equipment in accordance with LRAPA 34-010 and 34-034 through 34-038.

G21. New Source Review Modification [LRAPA 38]

No permittee must 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) and having satisfied the requirements of LRAPA Title 38.

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will 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.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

The permittee must 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 must also furnish to LRAPA copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to LRAPA along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
- b. A permit must 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 must follow the same procedures as apply to initial permit issuance and must affect only those parts of the permit for which cause to reopen exists.

G25. 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.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must 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 must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit must remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. 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).

G28. Property Rights [OAR 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.

G29. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

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



Lanz Cabinet Shop, Inc.  
Expiration Date: July 29, 2024

Permit No. 204739  
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ALL INQUIRIES SHOULD BE DIRECTED TO:

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

**Attachment 1**

**40 CFR 63, Subpart JJ: Table 3 —Summary of Emission Limits**

Emission point	New source
Finishing Operations:	
(a) Achieve a weighted average VHAP content across all coatings (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied)	<sup>a</sup> 0.8
(b) Use compliant finishing materials (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied):	
—stains	<sup>a</sup> 1.0
—washcoats	<sup>a b</sup> 0.8
—sealers	<sup>a</sup> 0.8
—topcoats	<sup>a</sup> 0.8
—basecoats	<sup>a b</sup> 0.8
—enamels	<sup>a b</sup> 0.8
—thinners (maximum percent VHAP allowable); or	10.0
(c) As an alternative, use control device; or	<sup>c</sup> 0.8
(d) Use any combination of (a), (b), and (c)	0.8
Cleaning Operations:	
Strippable spray booth material (maximum VOC content, kg VOC/kg solids [lb VOC/lb solids])	0.8
Contact Adhesives:	
(a) Use compliant contact adhesives (maximum kg VHAP/kg solids [lb VHAP/lb solids], as applied) based on following criteria:	
i. For aerosol adhesives, and for contact adhesives applied to nonporous substrates	<sup>d</sup> NA
ii. For foam adhesives used in products that meet flammability requirements	0.2
iii. For all other contact adhesives (including foam adhesives used in products that do not meet flammability requirements); or	0.2
(b) Use a control device	<sup>e</sup> 0.2
All Finishing Operations and Contact Adhesives:	
(a) Achieve total free formaldehyde emissions across all finishing operations and contact adhesives, lb per rolling 12 month period, as applied	400
(b) Use coatings and contact adhesives only if they are low-formaldehyde coatings and contact adhesives	<sup>f</sup> 1.0

<sup>a</sup>The limits refer to the VHAP content of the coating, as applied.

<sup>b</sup>Washcoats, basecoats, and enamels must comply with the limits presented in this table if they are purchased premade, that is, if they are not formulated onsite by thinning other finishing materials. If they are formulated onsite, they must be formulated using compliant finishing materials, i.e., those that meet the limits specified in this table, and thinners containing no more than 3.0 percent VHAP by weight.

<sup>c</sup>The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.8 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

<sup>d</sup>There is no limit on the VHAP content of these adhesives.

<sup>e</sup>The control device must operate at an efficiency that is equivalent to no greater than 1.0 kilogram (or 0.2 kilogram) of VHAP being emitted from the affected emission source per kilogram of solids used.

<sup>f</sup>The limits refer to the formaldehyde content by weight of the coating or contact adhesive, as specified on certified product data sheets.

**Table 5 to Subpart JJ of Part 63—List of VHAP of Potential Concern Identified by Industry**

CAS No.	Chemical name	EPA de minimis, tons/yr
68122	Dimethyl formamide	1.0
50000	Formaldehyde	0.2
75092	Methylene chloride	4.0
79469	2-Nitropropane	1.0
78591	Isophorone	0.7
1000425	Styrene monomer	1.0
108952	Phenol	0.1
111422	Dimethanolamine	5.0
109864	2-Methoxyethanol	10.0
111159	2-Ethoxyethyl acetate	10.0

## ATTACHMENT A: Air Pollution Emergencies

Table I

### AIR POLLUTION EPISODE: *ALERT CONDITION*

#### EMISSION REDUCTION PLAN

#### Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For *Alert Conditions* due to excessive levels of carbon monoxide or ozone, persons operating motor vehicles shall be requested to voluntarily curtail or eliminate all unnecessary operations within the designated *Alert Area*, and public transportation systems shall be requested to provide additional services in accordance with a preplanned strategy.

#### Part B: Pollution Episode Conditions for Particulate Matter

For *Alert Conditions* resulting from excessive levels of particulate matter, the following measures shall be taken in the designated area:

1. There shall be no open burning by any person of any material.
2. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12 noon and 4 p.m.
3. Persons responsible for the operation of any source of air contaminants listed below shall take all required actions for the *Alert Level*, in accordance with the preplanned strategy:

Source of Contamination	Control Actions — <i>Alert Level</i>
A. Coal, oil, or wood-fired facilities.	<ol style="list-style-type: none"><li>1) Utilization of electric generating fuels having low ash and sulfur content.</li><li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li><li>3) Diverting electric power generation to facilities outside of <i>Alert Area</i>.</li></ol>
B. Coal, oil, or wood-fired process steam generating facilities.	<ol style="list-style-type: none"><li>1) Utilization of fuel having low ash and sulfur content.</li><li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li></ol>

Source of Contamination	Control Actions — <i>Alert Level</i>
	3) Substantial reduction of steam load demands consistent with continuing plant operations.
C. Manufacturing industries of the following classifications:  - Primary Metals Industries - Petroleum Refining - Chemical Industries - Mineral Processing Indus. - Grain Industries - Paper and Allied Products - Wood Processing Industry	1) Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations.  2) Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance.  3) Reduction of heat load demands for processing.  4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

**Table II**

AIR POLLUTION EPISODE: **WARNING CONDITIONS**

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For **Warning Conditions**, resulting from excessive levels of carbon monoxide or ozone, the following measures shall be taken:

1. Operation of motor vehicles carrying fewer than three (3) persons shall be prohibited within designated areas during specified hours. Exceptions from this provision are:
  - A. Public transportation and emergency vehicles
  - B. Commercial vehicles
  - C. Through traffic remaining on Interstate or primary highways.
2. At the discretion of the Agency, operations of all private vehicles within designated areas or entry of vehicles into designated areas may be prohibited for specified periods of time.
3. Public transportation operators shall, in accordance with a pre-planned strategy, provide the maximum possible additional service to minimize the public's inconvenience as a result of No. 1 or No. 2. above.
4. For ozone episodes the following additional measures shall be taken:
  - A. No bulk transfer of gasoline without vapor recovery from 2:00 a.m. to 2:00 p.m.
  - B. No service station pumping of gasoline from 2:00 a.m. to 2:00 p.m.
  - C. No operation of paper coating plants from 2:00 a.m. to 2:00 p.m.
  - D. No architectural painting or auto finishing;
  - E. No venting of dry cleaning solvents from 2:00 a.m. to 2:00 p.m. (except perchloroethylene).
5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.

Part B: Pollution Episode Conditions for Particulate Matter

For **Warning Conditions** resulting from excessive levels of particulate matter, the following measures shall be taken:

1. There shall be no open burning by any person of any material.
2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.
3. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12 noon and 4 p.m.
4. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.
5. Persons responsible for the operation of any source of air contaminants listed below shall take all required

actions for the **Warning Level**, in accordance with a preplanned strategy:

Source of Contamination	Control Actions — <b>Warning Level</b>
<p>A. Coal, oil, or wood-fired electric power generating facilities.</p>	<ol style="list-style-type: none"> <li>1) Maximum utilization of fuels having lowest ash and sulfur content.</li> <li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li> <li>3) Diverting electric power generation to facilities outside of <b>Warning Area</b>.</li> <li>4) Prepare to use a plan of action if an <b>Emergency Condition</b> develops.</li> <li>5) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</li> </ol>
<p>B. Coal, oil, or wood-fired process steam generating facilities.</p>	<ol style="list-style-type: none"> <li>1) Maximum utilization of fuels having the lowest ash and sulfur content.</li> <li>2) Utilization of mid-day (12: 00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li> <li>3) Prepare to use a plan of action if an <b>Emergency Condition</b> develops.</li> <li>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</li> </ol>
<p>C. Manufacturing industries which require considerable lead time for shut-down including the following classifications:</p> <ul style="list-style-type: none"> <li>- Petroleum Refining</li> <li>- Chemical Industries</li> <li>- Primary Metals Industries</li> <li>- Glass Industries</li> <li>- Paper and Allied Products</li> </ul>	<ol style="list-style-type: none"> <li>1) Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.</li> <li>2) Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.</li> <li>3) Maximum reduction of heat load demands for processing.</li> <li>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence of boiler lancing or soot blowing.</li> </ol>

Source of Contamination	Control Actions — <i>Warning Level</i>
D. Manufacturing industries which require relatively short time for shut-down.	<ol style="list-style-type: none"><li>1) Elimination of air contaminants from manufacturing operations by ceasing, allied operations to the extent possible without causing injury to persons or damage to equipment.</li><li>2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.</li><li>3) Reduction of heat load demands for processing.</li><li>4) Utilization of mid-day (12 noon to 4 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</li></ol>



**Table III**

AIR POLLUTION EPISODE: **EMERGENCY CONDITIONS**

EMISSION REDUCTION PLAN

1. There shall be no open burning by any person of any material.
2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.
3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture shall immediately cease operation, except the following:
  - A. Police, fire, medical and other emergency services;
  - B. Utility and communication services;
  - C. Governmental functions necessary for civil control and safety;
  - D. Operations necessary to prevent injury to persons or serious damage to equipment or property;
  - E. Food stores, drug stores and operations necessary for their supply;
  - F. Operations necessary for evacuation of persons leaving the area;
  - G. Operations conducted in accordance with an approved preplanned emission reduction plan on file with the Agency.
4. All commercial and manufacturing establishments not included in these rules shall institute such actions as will result in maximum reduction of air contaminants from their operations which emit air contaminants, to the extent possible without causing injury or damage to equipment.
5. The use of motor vehicles is prohibited except for the exempted functions in 3, above.
6. Airports shall be closed to all except emergency air traffic.
7. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces.
8. Any person responsible for the operation of a source of atmospheric contamination listed below shall take all required control actions for this **Emergency Level**.

Source of Contamination	Control Actions — <b>Emergency Level</b>
A. Coal, oil, or wood-fired electric power generating facilities.	1) Maximum utilization of fuels having lowest ash and sulfur content.
	2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

Source of Contamination	Control Actions — <i>Emergency Level</i>
	3) Diverting electric power generation to facilities outside of Emergency area. 4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
B. Coal, oil, or wood-fired steam generating facilities.	1) Reducing heat and steam process demands to absolute necessities consistent with preventing equipment damage. 2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing. 3) Taking the action called for in the emergency plan. 4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
C. Manufacturing industries of the following classifications: - Primary Metals Industry - Petroleum Refining Operations - Chemical Industries - Mineral Processing Industries - Paper and Allied Products - Grain Industry - Wood Processing Industry	1) The elimination of air of contaminants from manufacturing operations by ceasing, curtailing, postponing or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment. 2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances. 3) Maximum reduction of heat load demands for processing. 4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.