



**BASIC
AIR CONTAMINANT DISCHARGE PERMIT**

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

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Carothers & Son, LTD
P.O. Box 2709
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application No.: 66324
Date Received: 07/30/2020

PLANT SITE LOCATION:

71/75 S. Bertelsen Road
Eugene, Oregon 97402

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: June 15, 2010

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

AUG 24 2020

Merlyn L. Hough, Director

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 7	Surface coating operations whose actual or expected usage of coating materials is greater than 250 gallons/year, but less than 250 gallons/month, excluding sources that exclusively use non-VOC and non-HAP containing coatings.	3564

1.0 PERMIT ISSUANCE

- 1.1 Qualifications** All of the following conditions must be met in order to qualify for this permit:
- a. The permittee is performing surface coating as described on the cover page of this permit, including supporting activities.
 - b. A General, Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded, as long as the permittee complies with the conditions of this permit. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a General, Simple or Standard ACDP, if applicable.
- 1.3 Relation to Local Land Use Laws** This permit is not valid at any location where the operation of the permittee's processes, activities, or insignificant activities would be in violation of any local land use or zoning laws.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Production Limits** The permittee is prohibited from using 250 gallons or more of VOC-containing coating materials in a calendar month without first notifying LRAPA.
- 2.2 Visible Emission Limits** The permittee must not allow emissions from any air contaminant source to equal or exceed an average of 20% opacity for a period or periods aggregating more than three minutes in any one hour. "Opacity means the degree to which an emission reduces the transmission of light and obscures the view of an object in the background. The aggregate times consist of the total duration of all readings during the observation period that are equal or greater than 20% opacity, whether or not the readings are consecutive. Each observation represents 15 seconds of time. The

visible emissions standard in this condition does not apply to fugitive emissions from the source. [LRAPA 32-010]

2.3 Particulate Matter Emissions

Particulate matter emissions from any air contaminant source, other than fugitive emission sources, must not exceed 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)]

2.4 Fugitive Emissions

The permittee must take reasonable precautions to prevent particulate matter from becoming airborne. [LRAPA 48-015]

2.5 Particulate Matter Fallout

The permittee must not cause or permit the emission of particulate matter larger than 250 microns in size at such duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

2.6 Nuisance and Odors

The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010]

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

3.1 Operation of Pollution Control Devices and Processes

The permittee must operate and maintain air pollution control devices and emission reduction processes at the highest reasonable efficiency and effectiveness to minimize emissions. Air pollution control devices and components must be in operation and functioning properly at all times when the associated emission source is operating. [LRAPA 32-007]

4.0 RECORDKEEPING REQUIREMENTS

4.1 Monitoring Requirements

The permittee must monitor and maintain records of the operation and maintenance of the plant as required in Condition 5.2. [LRAPA 32-007(1)]

4.2 Operation and Maintenance

The permittee must maintain all records associated with operation and maintenance of the plant and associated air contaminant control devices, including, but not limited to, SDS or CPDS for each coating material, calculations, production records, and maintenance records. [LRAPA 32-007(1)(b)]

4.3 Excess Emissions

The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. Excess

emissions are evident when visible emissions are greater than 20% opacity for three minutes or more in any 60-minute period. [LRAPA 36-025]

4.4 Complaint log The permittee must maintain a log of all written complaints and complaints received via telephone, fax, or email that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. [LRAPA 34-016]

4.5 Retention of Records Unless otherwise specified, all records must be maintained on site for a period of five (5) years and must be made available to LRAPA upon request. [LRAPA 34-016(5)]

5.0 REPORTING REQUIREMENTS

5.1 Excess Emissions The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health. [LRAPA 36-020]

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 6.2.
- b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current phone number is 1-800-452-0311.
- c. The permittee must also submit follow-up reports when required by LRAPA.

5.2 Annual Report The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, two (2) copies of the following information for the preceding calendar year: [LRAPA 34-016(2)]

- a. Operating parameters:
 - i. The number of gallons of VOC-containing coating materials used.
 - ii. The number of pounds of each type of welding rod and/or welding wire used.
- b. Records of all planned and unplanned excess emissions events.

- c. A summary of complaints relating to air quality received by the permittee.
 - d. A list of permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - e. A list of major maintenance performed on pollution control equipment.
- 5.3 Notice of Change of Ownership or Company Name** The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or.
 - b. Sale or exchange of the activity or facility.
- 5.4 Construction or Modification Notices** The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that the process equipment is substantially changed or added to, or emissions are significantly changed or decreased.
- 5.5 Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 6.2.

6.0 ADMINISTRATIVE REQUIREMENTS

- 6.1 Renewal of the Basic Permit** A complete application for renewal of this permit is due within 30 days prior to expiration. [LRAPA 37-0040(2)(b)(A)]
- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is renewed.
 - b. The permittee may submit an application for either a General, Simple or Standard ACDP at any time, but the permittee must continue to comply with the Basic ACDP until LRAPA takes final action on the General, Simple or Standard ACDP application.
 - c. If a complete application for renewal of the Basic ACDP or a General, Simple or Standard ACDP application is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

- 6.2 LRAPA Address and Contact Number** All reports, notices, and applications should be directed to the LRAPA office. The LRAPA address is as follows:

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

- 6.3 LRAPA Website** Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

7.0 FEES

- 7.1 Annual Fees** The Annual Fees specified in LRAPA Title 37, Section 37-8020, Table 2, Parts 2 and 3 for a Basic ACDP are due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.
[LRAPA 37-0056(2)]

- 7.2 Where to Submit Fees** Fees must be submitted to:

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

8.0 GENERAL CONDITIONS

- 8.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 8.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 8.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions 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 32-050]
- 8.4 LRAPA Access** The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.
- 8.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 8.6 Outdoor Burning** The permittee may not conduct any outdoor burning except as allowed by LRAPA Title 47.
- 8.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 8.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 8.9 Termination, Revocation, or Modification** LRAPA may modify or revoke this permit as authorized under LRAPA Title 37, Section 37-0082 and Section 37-0084.

9.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	Oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
calendar year	The 12-month period beginning January 1st and ending December 31st	ORS	Oregon Revised Statutes
CFR	Code of Federal Regulations	O&M	Operation and maintenance
CO	Carbon monoxide	Pb	Lead
CPDS	Certified Product Data Sheet	PCD	Pollution control device
DEQ	Oregon Department of Environmental Quality	PM	Particulate matter
dscf	Dry standard cubic foot	PM ₁₀	Particulate matter less than 10 microns in size
EPA	US Environmental Protection Agency	ppm	Part per million
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
gal	Gallon(s)	PSEL	Plant Site Emission Limit
gr/dscf	Grains per dry standard cubic foot	PTE	Potential to Emit
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RACT	Reasonably Available Control Technology
ID	Identification number	scf	Standard cubic foot
I&M	Inspection and maintenance	SDS	Safety Data Sheet
lb	Pound(s)	SER	Significant Emission Rate
MMBtu	Million British thermal units	SIC	Standard Industrial Code
NA	Not applicable	SIP	State Implementation Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SO ₂	Sulfur dioxide
NO _x	Nitrogen oxides	Special Control Area	As defined in LRAPA Title 29
NSPS	New Source Performance Standard	VE	Visible emissions
		VOC	Volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Carothers & Son, LTD
 71/75 S. Bertelsen Road
 Eugene, Oregon 97402
 541-484-4270

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
Feb 15	NA	X	NA	NA	I

1. The proposed permit is a renewal for an existing facility located at 71/75 S. Bertelsen Road in Eugene, Oregon. The permit renewal is for an existing Basic Air Contaminant Discharge Permit (ACDP) that was issued on October 25, 2010 and was originally scheduled to expire on October 25, 2020.
2. The permittee primarily manufactures dust collection systems and components. The facility also manufactures pneumatic, mechanical, and gravity conveyance equipment. The facility uses a number of paint booths equipped with dry filters to apply surface coatings to metal parts in the course of manufacturing their products. The facility also performs welding operations on both stainless and carbon steel.
3. This facility qualifies for a Basic ACDP because the actual usage of coating materials in the surface coating operations are greater than 250 gallons per year, but less than 250 gallons per month, excluding sources that exclusively use non-VOC and non-HAP containing coatings.
4. The previous Basic ACDP stated that this facility was subject to 40 CFR 63 subpart XXXXXX (6X) - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories. However, in order to be subject to 6X the facility must be "primarily engaged" in the activities described by the NAICS and SIC code combinations explicitly subject to this rule. This facility is primarily engaged in activities described by SIC code 3564 and NAICS code 333413 which is not a combination that is covered by 6X. The renewal of the Basic ACDP will remove any reference to the applicability of 6X to this facility.
5. The facility is not subject to 40 CFR 63 subpart HHHHHH (6H) - National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources. According to their exemption request submitted on August 10, 2020 the facility does not use methylene chloride for paint stripping and the surface coatings they apply do not contain the target metals of cadmium, chromium, lead, manganese, and nickel, in reportable quantities that are subject to this regulation.

6. The facility is located in an area that has been designated an attainment area for PM_{2.5}, ozone (VOC), NO₂, SO₂, Pb and a maintenance area for CO and PM₁₀.
7. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases, the emissions will not exceed 5 tons of PM or PM₁₀ or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
8. Pursuant to subsection 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with paragraph 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

JJW:rr
08/21/2020