



State of Oregon
 Department of
 Environmental
 Quality

**GENERAL
 AIR CONTAMINANT DISCHARGE PERMIT
 ATTACHMENT**

Department of Environmental Quality
 Air Quality Division
 811 SW Sixth Avenue
 Portland, OR 97204-1390
 Telephone: (503) 229-5359

This attachment is issued in accordance with ORS 468A.040 and OAR 340-216-0062

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Signed copy on file at DEQ Headquarters Office

Uri Papish, Air Quality Program Operations Manager

Dated

Table 1 Code	Source Description	SIC	NAICS
Part B, 58	Paint and Allied Products Manufacturing subject to an Area Source NESHAP	2819, 2851, 2869, 2891, 2893, 2899	325510, 325520, 325910, 325998

TABLE OF CONTENTS

1.0 ATTACHMENT ASSIGNMENT2

2.0 OPERATION AND MAINTENANCE REQUIREMENTS3

3.0 COMPLIANCE DEMONSTRATION5

4.0 RECORDKEEPING REQUIREMENTS8

5.0 REPORTING REQUIREMENTS10

6.0 ADMINISTRATIVE REQUIREMENTS11

7.0 EMISSION FACTORS.....11

8.0 CONTROL EFFICIENCIES12

9.0 PROCESS/PRODUCTION RECORDS.....12

10.0 FEES12

11.0 GENERAL CONDITIONS AND DISCLAIMERS12

12.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS13

1.0 ATTACHMENT ASSIGNMENT

- 1.1 Qualifications** The following conditions must be met in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP) Attachment:
- a. The source is performing paint and allied product manufacturing, is an area source of hazardous air pollutant emissions, and is processing, using, or generating materials containing benzene, methylene chloride, or compounds of cadmium, chromium, lead, and/or nickel, in amounts greater than or equal to 0.1 percent by weight.
 - b. A Simple or Standard ACDP is not required for the source.
 - c. The source is not having ongoing, recurring or serious compliance problems.
- 1.2 Assignment** DEQ will assign qualifying permittees to this attachment that have and maintain a good record of compliance with DEQ's Air Quality regulations and that DEQ determines would be appropriately regulated by a General ACDP. DEQ may rescind assignment if the permittee no longer meets the requirements of OAR 340-216-0060 and the conditions of this attachment.
- 1.3 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source(s) listed on the first page of this attachment until this attachment expires, is modified, revoked or rescinded as long as conditions of this attachment are complied with. If there are other emissions activities occurring at the site besides those listed on the cover page of this attachment, the permittee may be required to obtain a Simple or Standard ACDP or General ACDP Attachment(s), if applicable.
- 1.4 Relation to Local Land Use Laws** This attachment is not valid in Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would be in violation of any local land use or zoning laws. For operations within Lane County, contact the Lane Regional Air Pollution Authority for obtaining any necessary permits at (541) 736-1056. It is the permittee's sole responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location.

2.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 2.1 General Duty Clause** At all times, including periods of startup, shutdown, and malfunction, the permittee must operate and maintain any affected source, including associated air pollution control equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. During a period of startup, shutdown, or malfunction, this general duty to minimize emissions requires that the permittee reduce emissions from the affected source to the greatest extent which is consistent with safety and good air pollution control practices. The general duty to minimize emissions during a period of startup, shutdown, or malfunction does not require the permittee to achieve emission levels that would be required by the applicable standard at other times if this is not consistent with safety and good air pollution control practices, nor does it require the permittee to make any further efforts to reduce emissions if levels required by the applicable standard have been achieved.
- 2.2 Minimizing Fugitive Emissions** The permittee must operate a capture system that minimizes fugitive particulate emissions during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling process.
- 2.3 Adding Pigments and Solids to Process Vessels** The permittee must:
- a. Capture particulate emissions and route them to a particulate control device meeting the requirements of Condition 2.6 during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to a process vessel; or
 - b. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel only in paste, slurry, or liquid form.
- 2.4 Adding Pigments and Solids to Grinding and Milling Process** The permittee must:
- a. Capture particulate emissions and route them to a particulate control device meeting the requirements of Condition 2.6 during the addition of dry pigments and solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process; or
 - b. Add pigments and other solids that contain compounds of cadmium, chromium, lead, or nickel to the grinding and milling process only in paste, slurry, or liquid form.

- 2.5 Grinding and Milling** The permittee must:
- Capture particulate emissions and route them to a particulate control device meeting the requirements of Condition 2.6 during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel;
 - Fully enclose the grinding and milling equipment during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel; or
 - Ensure that the pigments and solids are in the solution during the grinding and milling of materials containing compounds of cadmium, chromium, lead, or nickel.
- 2.6 Particulate Control Device** The visible emissions from the particulate control device exhaust must not exceed 10-percent opacity for particulate control devices that vent to the atmosphere (see Condition 3.2c). This requirement does not apply to particulate control devices that do not vent to the atmosphere.
- 2.7 Process and Storage Vessels** Process and storage vessels that store or process materials containing benzene or methylene chloride, except for process vessels which are mixing vessels, must be equipped with covers or lids meeting the following requirements:
- The covers or lids can be of solid or flexible construction, provided they do not warp or move around during the manufacturing process.
 - The covers or lids must maintain contact along at least 90-percent of the vessel rim. The 90-percent contact requirement is calculated by subtracting the length of any visible gaps from the circumference of the process vessel, and dividing this number by the circumference of the process vessel. The resulting ratio must not exceed 90-percent.
 - The covers or lids must be maintained in good condition.
- 2.8 Mixing Vessels** Mixing vessels that store or process materials containing benzene or methylene chloride must be equipped with covers that completely cover the vessel, except as necessary to allow for safe clearance of the mixer shaft.
- 2.9 All Vessels** All vessels that store or process materials containing benzene or methylene chloride must be kept covered at all times, except for quality control testing and product sampling, addition of materials, material removal, or when the vessel is empty. The vessel is empty if:

- a. All materials containing benzene or methylene chloride have been removed that can be removed using the practices commonly employed to remove materials from that type of vessel, e.g., pouring, pumping, and aspirating; and
- b. No more than 2.5 centimeters (one inch) depth of residue remains on the bottom of the vessel, or no more than 3 percent by weight of the total capacity of the vessel remains in the vessel.

2.10 Leaks and Spills Leaks and spills of materials containing benzene or methylene chloride must be minimized and cleaned up as soon as practical, but no longer than 1 hour from the time of detection.

2.11 Rags and Other Materials Rags or other materials that use a solvent containing benzene or methylene chloride for cleaning must be kept in a closed container. The closed container may contain a device that allows pressure relief, but does not allow liquid solvent to drain from the container.

3.0 COMPLIANCE DEMONSTRATION

3.1 Initial Compliance Demonstration Initial particulate control device inspections and tests. The permittee must conduct an initial inspection of each particulate control device according to the requirements in Conditions 3.1a through 3.1c and perform a visible emissions test according to the requirements of Condition 3.1d. The permittee must record the results of each inspection and test according to Condition 4.1 and perform corrective action where necessary. The permittee must conduct each inspection no later than June 1, 2013 or 180 days after startup of the affected source, whichever is later, for each control device which has been operated prior to February 1, 2013 or within 60 days following startup of the affected source. For a control device which has not been installed or operated prior to February 1, 2013 or within 60 days following startup of the affected source, the permittee must conduct an initial inspection prior to startup of the control device.

- a. For each wet particulate control system, the permittee must verify the presence of water flow to the control equipment. The permittee must also visually inspect the system ductwork and control equipment for leaks and inspect the interior of the control equipment (if applicable) for structural integrity and the condition of the control system.

- b. For each dry particulate control system, the permittee must visually inspect the system ductwork and dry particulate control unit for leaks. The permittee must also inspect the inside of each dry particulate control unit for structural integrity and condition.
- c. An initial inspection of the internal components of a wet or dry particulate control system is not required if there is a record that an inspection meeting the requirements of this Condition has been performed within the past 12 months and any maintenance actions have been resolved.
- d. For each particulate control device, the permittee must conduct a visible emission test consisting of three 1-minute test runs using Method 203C (40 CFR part 51, appendix M). The visible emission test runs must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If the average test results of the visible emissions test runs indicate an opacity greater than the applicable limitation in Condition 2.6, the permittee must take corrective action and retest within 15 days.

**3.2 Ongoing
Compliance
Demonstration**

Following the initial inspections, the permittee must perform periodic inspections of each PM control device according to the requirements in Conditions 3.2a or 3.2b. The permittee must record the results of each inspection according to Condition 4.1 and perform corrective action where necessary. The permittee must also conduct tests according to the requirements in Condition 3.2c and record the results according to Condition 4.1.

- a. The permittee must inspect and maintain each wet particulate control system according to the following requirements:
 - i. The permittee must conduct a daily inspection to verify the presence of water flow to the wet particulate control system.
 - ii. The permittee must conduct weekly visual inspections of any flexible ductwork for leaks.
 - iii. The permittee must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the wet control system (if applicable) to determine the structural integrity and condition of the control equipment every 12 months.

- b. The permittee must inspect and maintain each dry particulate control unit according to the following requirements:
 - i. The permittee must conduct weekly visual inspections of any flexible ductwork for leaks.
 - ii. The permittee must conduct inspections of the rigid, stationary ductwork for leaks, and the interior of the dry particulate control unit for structural integrity and to determine the condition of the fabric filter (if applicable) every 12 months.
- c. For each particulate control device, the permittee must conduct a 5-minute visual determination of emissions from the particulate control device every 3 months using Method 22 (40 CFR part 60, appendix A-7). The visible emission test must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. If visible emissions are observed for two minutes of the required 5-minute observation period, the permittee must conduct a Method 203C (40 CFR part 51, appendix M) test within 15 days of the time when visible emissions were observed. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel HAP to a process vessel or to the grinding and milling equipment. If the Method 203C test runs indicate an opacity greater than the limitation in Condition 2.6, the permittee must comply with the following requirements:
 - i. The permittee must take corrective action and retest using Method 203C within 15 days. The Method 203C test will consist of three 1-minute test runs and must be performed during the addition of dry pigments and solids containing compounds of cadmium, chromium, lead, or nickel to a process vessel or to the grinding and milling equipment. The permittee must continue to take corrective action and retest each 15 days until a Method 203C test indicates an opacity equal to or less than the limitation in Condition 2.6.

- ii. The permittee must prepare a deviation report in accordance with Condition 5.3d for each instance in which the Method 203C opacity results were greater than the limitation in Condition 2.6.
- iii. The permittee must resume the visible determinations of emissions from the particulate control device in accordance with Condition 3.2c 3 months after the previous visible determination.
- 3.3 Emissions Monitoring**
- a. The permittee must monitor the emissions from the activities covered by this attachment using the following calculation for each pollutant for each 12-consecutive calendar month period:
- $$E = \Sigma(EF \times P \times (1-CE/100))/2000 \text{ lbs}$$
- where,
- E = pollutant emissions (ton/yr);
- EF = pollutant emission factor (see Condition 7.0);
- CE = control efficiency, percent (see Condition 8.0);
- P = process throughput (see Condition 9.0)
- b. The emissions determined above must be included in the total emissions calculation for determining compliance with the PSEL(s) in the “parent” permit.
- 3.4 Emission Factors**
- The permittee must use the default emission factors and control efficiencies provided in Conditions 7.0 and 8.0 of this permit for calculating pollutant emissions, unless alternative emission factors are approved by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ.

4.0 RECORDKEEPING REQUIREMENTS

- 4.1 Inspection and Testing Requirements**
- The permittee must record the following information for each inspection and testing activity:
- The date, place, and time;
 - Person conducting the activity;
 - Technique or method used;
 - Operating conditions during the activity;
 - Results; and
 - Description of correction actions taken.

4.2 General

The permittee must maintain the following records, for five years after the date of each recorded action, in a form suitable and readily available for expeditious review:

- a. The permittee must keep a copy of each notification that was submitted in accordance with Conditions 5.1 and 5.2, and all documentation supporting any Notification of Applicability and Notification of Compliance Status that was submitted.
- b. The permittee must keep a copy of each Annual Compliance Certification Report prepared in accordance with Condition 5.3.
- c. The permittee must keep records of all inspections and tests as required by Condition 4.1.
- d. If no longer processing, using, or generating materials containing hazardous air pollutants, the permittee must submit a Notification, which must include the following information:
 - i. The company's name and address;
 - ii. A statement by a responsible official indicating that the facility no longer processes, uses, or generates materials containing HAP, as defined in 40 CFR 63.11607, and that there are no plans to process, use or generate such materials in the future. This statement should also include the date by which the company ceased using materials containing HAP, as defined in 40 CFR 63.11607, and the responsible official's name, title, phone number, e-mail address and signature.

4.3 Retention of Records

The permittee must maintain files of all information (including all reports and notifications) in a form suitable and readily available for expeditious inspection and review. The files must be retained for at least 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. At a minimum, the most recent 2 years of data must be retained on site. The remaining 3 years of data may be retained off site. Such files may be maintained on microfilm, on a computer, on computer floppy disks, on magnetic tape disks, or on microfiche.

5.0 REPORTING REQUIREMENTS

- 5.1 Initial Notification of Applicability** For a new affected source, the permittee must submit an initial notification of applicability no later than 180 days after initial start-up of the operations. The notification of applicability must include the following information:
- a. The name and address of the owner or operator;
 - b. The address (i.e., physical location) of the affected source; and
 - c. An identification of the relevant standard, or other requirement, that is the basis of the notification and the source's compliance date.
- 5.2 Notification of Compliance Status** For an existing affected source, the permittee must submit a Notification of Compliance Status. For a new affected source, the permittee must submit a Notification of Compliance Status within 180 days after initial start-up. For an affected source that becomes an affected source after the applicable compliance date, the permittee must submit a Notification of Compliance Status within 180 days of the date processing, using, or generating materials containing HAP commences, as defined in 40 CFR 63.11607. This Notification of Compliance Status must include the following information:
- a. The company's name and address;
 - b. A statement by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification, a description of the method of compliance (i.e., compliance with management practices, installation of a wet or dry scrubber) and a statement of whether the source has complied with all the relevant standards and other requirements of the NESHAP.
- 5.3 Annual Compliance Certification Report** The permittee must prepare and submit to DEQ by **February 15** of each year this attachment is in effect, (2) copies of the following information for the preceding calendar year:
- a. Company name and address;
 - b. A statement that is signed by a responsible official with that official's name, title, phone number, e-mail address and signature, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of the NESHAP; and

- c. Date of report and beginning and ending dates of the reporting period. The reporting period is the 12-month period beginning on January 1 and ending on December 31.
- d. If a deviation has occurred during the reporting period, a description of deviations from the applicable requirements, the time periods during which the deviations occurred, and the corrective actions taken.

6.0 ADMINISTRATIVE REQUIREMENTS

6.1 Reattachment

A complete application for reattachment is due within 60 days after the attachment is reissued. DEQ will notify the permittee when the attachment is reissued. The application must be sent to the appropriate regional office.

- a. If DEQ is delinquent in renewing the attachment, the existing attachment will remain in effect and the permittee must comply with the conditions of the attachment until such time that the attachment is reissued and the source is reassigned to the attachment.
- b. The permittee may submit an application for either a Simple or Standard ACDP at any time, but the permittee must continue to comply with the General ACDP Attachment until DEQ takes final action on the Simple or Standard ACDP application.
- c. If a complete application for reassignment to the General ACDP Attachment or Simple or Standard ACDP is filed with DEQ in a timely manner, the attachment will not be deemed to expire until final action has been taken on the application.

7.0 EMISSION FACTORS

The following emission factors are for activities covered by this attachment.

Source	Pollutant	Device or Activity	Emission Factor	EF Units	EF Reference
Paint Production	PM/PM10/PM2.5	Pigment Handling	0.010	lb/lb pigment used	AP-42
	VOC	Paint Production	0.034	lb/lb solvent used	EIIP Ch. 8
	Volatile HAPs	(volatile HAP use/total volatile use) x total VOC emissions			
	Metal HAPs	(metal HAP use/ total solid use) x total PM emissions			
Ink Production	PM/PM10/PM2.5	Pigment Mixing	0.001	lb/lb pigment used	AP-42
	VOC	General Ink	0.060	lb/lb produced	AP-42
		Oil Ink	0.020	lb/lb produced	AP-42
		Oleoresinous Ink	0.075	lb/lb produced	AP-42
		Alkyd Ink	0.080	lb/lb produced	AP-42
	Volatile HAPs	(volatile HAP use/total volatile use) x total VOC emissions			
Metal HAPs	(metal HAP use/ total solid use) x total PM emissions				

8.0 CONTROL EFFICIENCIES

The following control efficiencies are for control device used to control emissions from activities covered by this attachment.

Pollutant	Control Device	Control Efficiency	Control Efficiency Reference
PM/PM10/PM2.5/Metal HAPs	Baghouse, ESP, Scrubber	95%	EIIP Ch. 8

9.0 PROCESS/PRODUCTION RECORDS

The following process/production records must be maintained onsite as required in Condition 4.3.

Emissions Device or Activity	Process or Production Parameter	Frequency
Production	Pounds Solvent Used	Monthly, Annually
	Pounds of Each Volatile HAP Solvent Used	Monthly, Annually
	Pounds Pigment Used	Monthly, Annually
	Pounds of Each Metal HAP Pigment Used	Monthly, Annually
	Pounds of Paint Produced	Monthly, Annually
	Pounds of Ink Produced	Monthly, Annually

10.0 FEES

- 10.1 Annual Compliance Fee** The Annual Compliance Determination Fee specified in OAR 340-216-0062 for a General ACDP Attachment is due on **December 1** of each year this attachment is in effect. An invoice indicating the amount, as determined by DEQ regulations, will be mailed prior to the above date.

11.0 GENERAL CONDITIONS AND DISCLAIMERS

- 11.1 Other Regulations** In addition to the specific requirements listed in this attachment, the permittee must comply with all other legal requirements enforceable by DEQ.
- 11.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this attachment, the most stringent conditions apply.
- 11.3 Permit Availability** The permittee must have a copy of the attachment available at the facility at all times.
- 11.4 Modification or Revocation** The Commission may modify or revoke this attachment pursuant to OAR 340-216-0060(3) and (4).

12.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit		principal business function, or any other person who performs similar policy or decision-making functions for the corporation, or a duly authorized representative of such person if the representative is responsible for the overall operation of one or more manufacturing, production, or operating facilities and either:
Calendar year	The 12-month period beginning January 1st and ending December 31st		(a) The facilities employ more than 250 persons or have gross annual sales or expenditures exceeding \$25 million (in second quarter 1980 dollars); or
CFR	Code of Federal Regulations		(b) The delegation of authority to such representative is approved in advance by DEQ
DEQ	Oregon Department of Environmental Quality		(2) For a partnership or sole proprietorship: A general partner or the proprietor, respectively
EF	Emission Factor		
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040		
Lb	Pound		
NESHAP	National Emissions Standards for Hazardous Air Pollutants		
OAR	Oregon Administrative Rules		
ORS	Oregon Revised Statutes		
Parent permit	The General ACDP the permittee is assigned to		
PM	Particulate matter	SIC	Standard Industrial Code
PM ₁₀	Particulate matter less than 10 microns in size	VOC	Volatile organic compound
PM _{2.5}	Particulate matter less than 2.5 microns in size	Year	A period consisting of any 12-consecutive calendar months
Responsible Official	(1) For a corporation: A president, secretary, treasurer, or vice president of the corporation in charge of a		