

Public Notice

DEQ Requests Comments on acpi Wood Products, LLC Proposed Air Quality Permit

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of acpi Wood Products LLC, known officially as Title V permit.

Summary

The existing Title V Permit was reopened by DEQ to revise mistakes related to establishing a carbon monoxide Plant Site Emission Limit.

How do I participate?

To submit your comments for the public record, send them by mail, fax or email:

Suzy Luttrell, Permit Coordinator
4026 Fairview Industrial Dr. SE
Salem, OR 97302

Fax: 503-378-4196

Email: luttrell.suzy@deq.state.or.us

Written comments were due by 5 p.m. July 17, 2018.

About the facility

acpi Wood Products LLC (previously known as Elkay Wood Products Company) manufactures kitchen cabinets and bathroom vanities. They currently are operating under Title V Permit No. 27-0005-TV-01. The permit covers activities at the facility located at 625 Hoffman Road in Independence, OR. The facility emits primarily volatile organic compounds from coating operations. The current permit was issued on Aug. 2, 2018 and is scheduled to expire on Aug. 1, 2023.

What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the table at the end of this document.

How does DEQ determine permit requirements?

DEQ evaluates types and amounts of pollutants and the facility's location, and determines permit requirements according to state and federal regulations.

How does DEQ monitor compliance with the permit requirements?

This permit would require the facility to monitor pollutants using federally approved monitoring practices and standards.

What happens after the public comment period ends?

DEQ will schedule a public hearing if one is requested by 10 or more people, or by an authorized person representing an organization of at least 10 people. An additional public notice would be published to advertise the public hearing.

If a public hearing is not requested, DEQ will consider and provide responses to all comments received at the close of the comment period. DEQ may modify provisions in the proposed permit, but the permit writers can only modify conditions of the permit in accordance with the rules and statutes under the authority of DEQ. Participation in the rulemaking or the legislative process is the only way to change the rules or statutes. Ultimately, if a facility meets all legal requirements, DEQ will issue the facility's air quality permit.

Where can I get more information?

Find out more and view the application at, or contact <http://www.oregon.gov/deq/Get-Involved/Pages/Public-Notices.aspx> or contact Yuki Puram at:

Phone: 503-378-8240 or 800-349-7677

Fax: 503-378-4196

Email: puram.yuki@deq.state.or.us

View the application and related documents in person at the DEQ office in Salem or at the Independence Public Library at 175 Monmouth St., Independence, Oregon. For a review appointment, call Suzy Luttrell at 503-378-5305.

Alternative Formats

DEQ can provide documents in an alternate format or in a language other than English upon request. Call DEQ at 800-452-4011 or email deqinfo@deq.state.or.us.



State of Oregon
Department of
Environmental
Quality

Western Region

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Contact: Yuki Puram

www.oregon.gov/DEQ

DEQ is a leader in restoring, maintaining and enhancing the quality of Oregon's air, land and water.

Notice issued: 05/23/18
By: Suzy Luttrell
Permit no. 27-0005

Emissions limits

Criteria Pollutants: Table 1 below presents maximum **allowable** emissions of criteria pollutants for the facility. The current emission limit reflects maximum emissions the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit.

Table 1

Criteria Pollutant	Current Limit (tons/year)	Proposed Limit (tons/year)
Particulate matter	NA	NA
Small particulate matter	NA	NA
Nitrogen oxides	39	39
Sulfur dioxide	NA	NA
Carbon monoxide	NA	99
Volatile organic compounds	249	249

For more information about criteria pollutants, go to: www.epa.gov/criteria-air-pollutants



State of Oregon
Department of
Environmental
Quality

OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY OREGON TITLE V OPERATING PERMIT

Western Region
4026 Fairview Industrial Dr. SE
Salem, OR 97302
503-378-8240

Issued in accordance with provisions of ORS 468A.040
and based on land use compatibility findings included in the permit record.

ISSUED TO:

acpi Wood Products, LLC
625 Hoffman Road
Independence, OR 97351

INFORMATION RELIED UPON:

Application Number: 30691 R-02
Received: 4/8/2019

PLANT SITE LOCATION:

625 Hoffman Road
Independence, OR 97351

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Independence
Dated: 10/26/00

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Claudia Davis, Western Region Air Quality Manager

Date

Nature of Business

Kitchen Cabinet Manufacturer

SIC

2434

NAICS

337110

RESPONSIBLE OFFICIAL

Title: Plant Manager

FACILITY CONTACT PERSON

Name: Al Mismas
Title: Supervisor, Maintenance
Phone: 503-751-0255

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LIST OF APPREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO _{2e}	Carbon Dioxide Equivalent
CPMS	Continuous Parameter Monitoring System
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission Factor
EPA	US Environmental Protection Agency
EU	Emissions Unit
FCAA	Federal Clean Air Act
FSA	Fuel sampling and analysis
GHG	Greenhouse gas
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040
HCFC	Halogenated Chloro-Fluoro-Carbons
ID	Identification number or label
I&M	Inspection and Maintenance
NA	Not applicable
NO _x	Nitrogen Oxides
O ₂	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate Matter
PM ₁₀	Particulate Matter less than 10 microns in size
PM _{2.5}	Particulate Matter less than 2.5 microns in size
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	Pounds per square inch, actual
SERP	Source Emissions Reduction Plan
SO ₂	Sulfur Dioxide
ST	Source Test
VE	Visible Emissions
VMT	Vehicle Miles Traveled
VOC	Volatile Organic Compounds

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(2)]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by DEQ, EPA, and citizens under the Clean Air Act, except Conditions 6, 7, 8, G5, and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [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)]:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Finishing Room 21 Spray booths for stains, sealers, glazes, topcoats and specialty coatings 15 Electric infrared/forced hot air ovens	EU-01	21 Spray booth filters NA	CD-01 through CD-21 NA
Space Heaters air make-up units	EU-02	NA	NA
Aggregate Insignificant VOC from space heaters	AI	NA	NA

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS

The following tables and conditions contain the applicable requirements along with testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

Facility wide emission limits and standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Testing Condition	Monitoring Condition
340-208-0210(2)	4	Fugitive emissions	minimize	NA	5
340-208-0300	6	Nuisance	no nuisance	NA	8
340-208-0450	7	PM >250 μ	no fallout	NA	8

4. **Applicable Requirement:** The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne.
 - 4.a. Such reasonable precautions must include, but not be limited to the following: [OAR 340-208-0210(1)]

- 4.a.i. 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.a.ii. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
 - 4.a.iii. Full or partial enclosure of materials stockpiles in cases where application of water or chemicals are not sufficient to prevent particulate matter from becoming airborne;
 - 4.a.iv. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - 4.a.v. Adequate containment during sandblasting or other similar operations;
 - 4.a.vi. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
 - 4.a.vii. Prompt removal from paved streets of earth or other material that does or may become airborne.
- 4.b. Upon request by DEQ, the permittee must develop a fugitive emission control plan for approval by DEQ 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 period.
5. **Monitoring Requirement:** The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is only enforceable by the state. [OAR 340-218-0050(3)(a)]

Nuisance Conditions

6. **Applicable Requirement:** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300] This condition is only enforceable by the State.
7. **Applicable Requirement:** The permittee must not cause or permit the deposition 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. [OAR 340-208-0450] This condition is only enforceable by the State.
8. **Monitoring Requirement:** The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is only enforceable by the State. [OAR 340-218-0050(3)(a)]

Emissions Unit EU-01 Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(4)	9	Visible emissions	20% opacity	6-minute block average	NA	11
340-226-0210(2)(b)	10	PM	0.14 gr/dscf, avg. of 3 test runs	ST periodic monitoring	NA	11
40 CFR 63.802(b)(1)	12.a	HAP	Stains-1.0 lb/lb solids; Other coatings-0.8 lb/lb solids	Recordkeeping	17	13.a
40 CFR 63.802(b)(1)	12.a	HAP	10% by weight	Recordkeeping	17	13.a
40 CFR 63.802(b)(1)	12.a	HAP	3% by weight	Recordkeeping	17	13.a
40 CFR 63.802(b)(2)	12.b	HAP	0.2 lb/lb solids	Recordkeeping	17	13.b
40 CFR 63.802(b)(3)	12.c	VOC	0.8 lb/lb solids	Recordkeeping	17	13.c
40 CFR 63.803	15	VOC/HAP	Work Practice Standards	Recordkeeping	17	16

VISIBLE EMISSIONS

9. The permittee must comply with the following visible emission limits: [OAR 340-208-0110(4)]
- 9.a. Any visible emissions may not equal or exceed an average of 20 percent opacity; and
- 9.b. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 9.b.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by:
- 9.b.i. EPA Method 9; or
- 9.b.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR Part 60; or
- 9.b.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.

PARTICULATE MATTER

10. The permittee may not emit particulate matter emissions in excess of 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)]
11. **Monitoring and Recordkeeping Requirement:** The permittee shall provide the Western Region-Salem Office of DEQ with written notification within five days of all visible emission or dust complaints received by the permittee during the operation of emissions unit EU-01, and shall maintain a log of each complaint. Documentation shall include date of contact, time of observed visible or dust emission, description of visible or dust emission, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative shall immediately investigate the condition following the receipt of the complaint and a plant representative shall provide a response to the complainant within 24 hours, if possible. [OAR 340-218-0050(3)(a)]

NESHAP Subpart JJ, VHAP EMISSIONS

12. **Applicable Requirement:** In accordance with 40 CFR 63.802, the permittee shall limit HAP emissions by meeting the following emission limitations:

- 12.a. The permittee shall limit HAP emissions from finishing operations by meeting the following emission limitations: [40 CFR 63.802(b)(1), 40 CFR Part 63 Subpart JJ Table 3]
- 12.a.i. Achieve a weighted average HAP content across all coatings of a maximum of 0.8 lb HAP/lb solids, as applied; or
- 12.a.ii. Use the following compliant finishing materials:
- 12.a.ii.A. Stains with HAP contents not to exceed 1.0 lb HAP/lb solids, as applied, and washcoats, sealers, topcoats, basecoats, and enamels with HAP contents not to exceed 0.8 lb HAP/lb solids, as applied; and
- 12.a.ii.B. Thinners with HAP contents not to exceed 10% by weight; or
- 12.a.ii.C. Thinners with HAP contents not to exceed 3% by weight when used to formulate washcoats, basecoats, and enamels on-site.
- 12.b. The permittee shall limit HAP emissions from contact adhesives, excluding aerosol adhesives and excluding contact adhesives applied to nonporous substrates, to a maximum of 0.2 lb HAP/lb solids, as applied. [40 CFR 63.802(b)(2)]
- 12.c. The permittee shall limit VOC emissions from strippable spray booth coatings by using coatings that contain no more than 0.8 lb VOC/lb solids, as applied. [40 CFR 63.802(b)(3)]
- 12.d. Limit formaldehyde emissions by complying with the provisions specified in either paragraph 12.d.i or 12.d.ii [40 CFR 63.802(b)(4)]
- 12.d.i. Limit total formaldehyde (F_{total}) use in coatings and contact adhesives to no more than 400 pounds per rolling 12 month period.
- 12.d.ii. Use coatings and contact adhesives only if they are low-formaldehyde coatings and adhesives, in any wood furniture manufacturing operations.
13. **Monitoring Requirement:** The permittee shall fulfill the following to demonstrate compliance with Condition 12:
- 13.a. In accordance with 40 CFR 63.804(d), the permittee shall demonstrate compliance with the provisions of Condition 12.a using either of the methods presented in Conditions 13.a.i or 13.a.ii
- 13.a.i. Calculate the average HAP content for all finishing materials used at the facility using the equation below, and maintain a value of E no greater than 0.8; or
- $$E = (M_{c1}C_{c1} + \dots + M_{cn}C_{cn} + S_1W_1 + \dots + S_nW_n)/(M_{c1} + \dots + M_{cn})$$
- Where:
- E = the emission limit achieved by an emission point or a set of emission points, in lb HAP/lb solids
- M_c = the mass of solids in finishing material (c), used monthly (lb solids/month)
- C_c = the HAP content of a finishing material (c), in pounds of volatile hazardous air pollutants per pound of coating solids (lb HAP/lb solids)
- S = the HAP content of a solvent, expressed as a weight fraction, added to the finishing materials

W = the amount of solvent, in pounds, added to the finishing materials during the monthly averaging period

- 13.a.ii. Use compliant finishing materials according to the following criteria:
- 13.a.ii.A. Demonstrate that each stain has a HAP content of no more than 1.0 lb HAP/lb solids, as applied, and that each sealer, basecoat, topcoat, and enamel has a HAP content of no more than 0.8 lb HAP/lb solids, as applied, and each thinner contains no more than 10.0 percent HAP by weight by maintaining certified product data sheets for each coating and thinner;
 - 13.a.ii.B. 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 HAP content of no more than 0.8 lb HAP/lb solids, as applied, and each thinner contains no more than 10 percent HAP by weight by maintaining certified product data sheets for each coating and thinner; and
 - 13.a.ii.C. Demonstrate by recordkeeping that each washcoat, basecoat, and enamel that is formulated at the source is formulated using a finishing material containing no more than 0.8 lb HAP/lb solids and a thinner containing no more than 3.0 percent HAP by weight. [40 CFR 63.804(d)]
- 13.b. The permittee shall monitor compliance with the provisions of Condition 12.b by demonstrating that each contact adhesive has a HAP content no greater than 0.2 lb HAP/lb solids, as applied. [40 CFR 63.804(e)]
- 13.c. The permittee shall monitor compliance with the provisions of Condition 12.c by demonstrating that each strippable spray booth coating has a VOC content of no more than 0.8 lb VOC/lb solids, as applied.
- 13.d. The permittee shall monitor compliance with the provisions of Condition 12.d by demonstrating that formaldehyde coatings and contact adhesives are in compliance with either 12.d.i or 12.d.ii.
14. **Recordkeeping Requirements:** In accordance with 40 CFR 63.806, the permittee shall fulfill the following recordkeeping requirements:
- 14.a. In complying with the emission limits in Condition 12, the permittee shall maintain records of the following [40CFR 63.806(b)]:
 - 14.a.i. A certified SDS or product data sheet for each finishing material, thinner, contact adhesive, and strippable spray booth coating subject to the emission limits in Condition 12;
 - 14.a.ii. The HAP content, in lb HAP/lb solids, as applied of each finishing material and contact adhesive subject to the emission limits in Conditions 12.a and 12.b; and
 - 14.a.iii. The VOC content, in lb VOC/lb solids, as applied, of each strippable booth coating subject to the emission limits in Condition 12.c.
 - 14.a.iv. The formaldehyde content, in lb/gal, as applied, of each finishing material and contact adhesive subject to the emission limits in Condition 12.d

- 14.b. If following the compliance method in Condition 13.a.i, the permittee shall maintain copies of the averaging calculation for each month as well as the data on the quantity of coatings and thinners used that is necessary to support the calculation of E in Equation 1, Condition 13.a.i. [40 CFR 63.806(c)]

NESHAP Subpart JJ, Work Practice Standards

15. **Applicable Requirement:** In accordance with 40 CFR 63.803, the permittee shall comply with the following work practice standards:
- 15.a. **Work practice implementation plan.** The permittee shall maintain a written work practice implementation plan that defines environmentally desirable work practices for each wood furniture manufacturing operation and addresses each of the work practice standards presented in this condition. The written work practice implementation plan shall be available for inspection by DEQ and the EPA Administrator upon request. If DEQ or the EPA Administrator determine that the work practice implementation plan does not adequately address each of the topics specified in this condition or that the plan does not include sufficient mechanisms for ensuring that the work practice standards are being implemented, DEQ or the EPA Administrator may require the permittee to modify the plan. [40 CFR 63.803(a)]
- 15.b. **Operator training course.** The permittee shall 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 Part 63 Subpart JJ. All new personnel shall be trained upon hiring. All personnel shall be given refresher training annually. The permittee shall maintain a copy of the training program with the work practice implementation plan. The training program shall include, at a minimum, the following:
- 15.b.i. A list of all current personnel by name and job description that are required to be trained;
- 15.b.ii. An outline of the subjects to be covered in the initial and refresher training for each position or group of personnel;
- 15.b.iii. Lesson plans for courses to be given at the initial and 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
- 15.b.iv. 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)]
- 15.c. **Inspection and maintenance plan.** The permittee shall maintain with the work practice implementation plan a written leak inspection and maintenance plan that specifies:
- 15.c.i. A minimum visual inspection frequency of once per month for all equipment used to transfer or apply coatings, adhesives, or organic HAP solvents;
- 15.c.ii. An inspection schedule;
- 15.c.iii. Methods for documenting the date and results of each inspection and any repairs that were made; and
- 15.c.iv. The time frame between identifying the leak and making the repair which adheres, at a minimum, to the following schedule;

- 15.c.iv.A. A first attempt at repair shall be made no later than five calendar days after the leak is detected; and
- 15.c.iv.B. Final repairs shall 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 shall be completed within three months. [40 CFR 63.803(c)]
- 15.d. **Cleaning and washoff solvent accounting system.** The permittee shall develop an organic HAP solvent accounting form to record:
 - 15.d.i. The quantity and type of organic HAP solvent used each month for washoff and cleaning, as defined in 40 CFR 63.801;
 - 15.d.ii. The number of pieces washed off, and the reason for the washoff; and
 - 15.d.iii. The quantity of spent organic HAP solvent generated from each washoff and cleaning operation each month, and whether it is recycled on-site or disposed off-site. [40 CFR 63.803(d)]
- 15.e. **Chemical composition of cleaning and washoff solvents.** The permittee shall not use cleaning or washoff solvents that contain any of the pollutants listed in Table 4 of 40 CFR 63 Subpart JJ, in concentrations subject to SDS reporting as required by OSHA. [40 CFR 63.803(e)]
- 15.f. **Spray booth cleaning.** The permittee shall 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 permittee shall 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. {40CFR 63.803(f)}
- 15.g. **Storage requirements.** The permittee shall use normally closed containers for storing finishing, gluing, cleaning, and washoff materials. [40 CFR 63.803(g)]
- 15.h. **Application equipment requirements.** The permittee shall use conventional air spray guns to apply finishing materials only under any of the following circumstances;
 - 15.h.i. To apply finishing materials that have a VOC content no greater than 1.0 lb VOC/lb solids, as applied;
 - 15.h.ii. For touch-up and repair under the following conditions:
 - 15.h.ii.A. The touch-up and repair occurs after completion of the finishing operation; or
 - 15.h.ii.B. The touch-up and repair occurs after the application of stain and before the application of any other type of finishing material, and the materials used for touch-up and repair are applied from a container that has a volume of no more than 2.0 gallons.
 - 15.h.iii. When spray is automated (that is, the spray gun is aimed and triggered automatically,

- not manually);
- 15.h.iv. When emissions from the finishing application station are directed to a control device;
- 15.h.v. The conventional air spray gun is used to apply finishing materials and the cumulative total usage of that finishing material is no more than 5.0 percent of the total gallons of finishing material used during that semiannual period; or
- 15.h.vi. The conventional air spray gun is used to apply stain on a part for which it is technically or economically infeasible to use any other spray application technology. The permittee shall demonstrate technical or economic infeasibility by submitting to DEQ and the EPA Administrator a videotape, a technical report, or other documentation that supports the permittee's claim of technical or economic infeasibility. The following criteria shall be used, either independently or in combination, to support the permittee's claim of technical or economic infeasibility:
- 15.h.vi.A. The production speed is too high or the part shape is too complex for one operator to coat the part and the application station is not large enough to accommodate an additional operator; or
- 15.h.vi.B. The excessively large vertical spray area of the part makes it difficult to avoid sagging or runs in the stain. [40 CFR 63.803(h)]
- 15.i. **Line cleaning.** The permittee shall pump or drain all organic HAP solvent used for line cleaning into a normally closed container. [40 CFR 63.803(i)]
- 15.j. **Gun cleaning.** The permittee shall collect all organic HAP solvent used to clean spray guns into a normally closed container. [40CFR 63.803(j)]
- 15.k. **Washoff operations.** The permittee shall control emissions from washoff operations by:
- 15.k.i. Using normally closed tanks for washoff; and
- 15.k.ii. Minimizing dripping by tilting or rotating the part to drain as much solvent as possible.[40 CFR 63.803(k)]
- 15.l. **Formulation assessment plan for finishing operations.** The permittee shall maintain with the work practice implementation plan a formulation assessment plan that:
- 15.l.i. Identifies HAPs from the list presented in Table 5 of Subpart JJ that are being used in the finishing operations at the facility;
- 15.l.ii. Establishes a baseline level of usage by the permittee for each HAP identified in Condition 15.l.i. 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 material, when it is applied, by a factor of 0.16;
- 15.l.iii. Tracks the annual usage of each HAP identified in Condition 15.l.i. by the permittee that is present in amounts subject to MSDS reporting as required by OSHA;
- 15.l.iv. If the annual usage of the HAP identified in Condition 15.l.i. exceeds its baseline level, then the permittee shall provide a written notification to DEQ 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 permittee is not in compliance with any State regulations or requirements for that HAP:

- 15.l.iv.A. The exceedance is not more than 15.0 percent above the baseline level;
 - 15.l.iv.B. Usage of the HAP is below the de minimis level presented in Table 5 of Subpart JJ for that HAP;
 - 15.l.iv.C. The facility is in compliance with the State's air toxic regulations or guidelines for the HAP; or
 - 15.l.iv.D. The source of the pollutant is a finishing material with a VOC content of no more than 1.0 lb VOC/lb solids, as applied.
 - 15.l.v. If none of the above explanations are the reason for the increase, the permittee shall confer with DEQ 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 shall 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 DEQ and the permittee. If there are no practical and reasonable solutions, the facility need take no further action. If there are solutions, the permittee shall develop a plan to reduce usage of the pollutant to the extent feasible. The plan shall address the approach to be used to reduce emissions, a timetable for implementing the plan, and a schedule for submitting notification of progress.
 - 15.l.vi. If the permittee uses a HAP of potential concern for which a baseline level has not been previously established, the baseline level shall be established as the de minimis level provided in the list of HAPs of potential concern in Table 6 of Subpart JJ. The affected source shall track the annual usage of each HAP of potential concern identified in this condition that is present in amounts subject to SDS reporting as required by OSHA. If usage of the HAP of potential concern exceeds the de minimis level listed in Table 6 of Subpart JJ for that chemical, then the permittee shall provide an explanation to DEQ that documents the reason for the exceedance of the de minimis level. If the explanation is not one of those listed in Condition 15.l.iv. above, the permittee shall follow the procedures established in Condition 15.l.v. [40 CFR 63.803(l)]
16. **Monitoring and Recordkeeping Requirement:** The permittee shall monitor compliance with Condition 15 using the recordkeeping requirements in below:
- 16.a. The permittee shall maintain on-site the work practice implementation plan required by Condition 15.a and all records associated with fulfilling the requirements of that plan, including:
 - 16.a.i. Records demonstrating that the operator training program required by Condition 15.b is in place;
 - 16.a.ii. Records collected in accordance with the inspection and maintenance plan required by Condition 15.c;
 - 16.a.iii. Records associated with the cleaning solvent accounting system required by Condition 15.d;
 - 16.a.iv. Records associated with the limitation on the use of conventional air spray guns

showing total finishing material usage and the percentage of finishing material applied with conventional air spray guns for each semiannual period as required by Condition 15.h.v;

- 16.a.v. Records associated with the formulation assessment plan required by Condition 15.115.l; and
 - 16.a.vi. 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)]
 - 16.a.vii. The permittee shall maintain records of the compliance certifications submitted in accordance with Condition 39 for each semiannual period. [40 CFR 63.806(h)]
 - 16.a.viii. The permittee shall maintain records of all other information submitted with the initial compliance report required by §63.9(h) and §63.807(b) and the semiannual reports required by Condition 39. [40 CFR 63.806(i)]
17. **Testing Requirement:** The permittee shall document the HAP content (or VOC content for strippable spray booth coatings) of wood furniture materials by either of the following methods:
- 17.a. The permittee may obtain a certified product data sheet from the supplier for each wood furniture material used at the facility. A certified product data sheet means documentation furnished by coating or adhesive suppliers or an outside laboratory that provides the HAP content of a finishing material, contact adhesive, or solvent, by percent weight, measured using the methods and procedures in Condition 17.b. The reportable HAP content should represent the maximum aggregate emissions potential of the finishing material, adhesive, or solvent in concentrations greater than or equal to 1.0 percent by weight or 0.1 percent for HAP that are carcinogens, as defined by the Occupational Safety and Health Administration Hazard Communication Standard (29 CFR 1910), as formulated.
 - 17.b. The permittee may perform, or have performed by an outside laboratory, the following test methods and procedures: [40 CFR 63.805(a)(1)]
 - 17.b.i. EPA Method 311 of Appendix A of 40 CFR Part 63 in conjunction with formulation data to determine the HAP content of the liquid coating. Formulation data shall be used to identify HAP present in the coating. EPA Method 311 shall then be used to quantify those HAP identified through formulation data. EPA Method 311 shall not be used to quantify HAPs such as styrene and formaldehyde that are emitted during the cure.
 - 17.b.ii. EPA Method 24 (40 CFR Part 60, Appendix A) shall be used to determine the solids content by weight and the density of coatings.
 - 17.b.iii. If it is demonstrated to the satisfaction of DEQ and the EPA Administrator that a coating does not release VOC or HAP byproducts during the cure (for example, all VOC and HAP present in the coating is solvent), then batch formulation information shall be accepted.
 - 17.b.iv. The permittee may request approval from DEQ and the EPA Administrator to use an alternative method for determining the HAP content of the coating. In the event of any inconsistency between EPA Method 24 or Method 311 test data and a facility's formulation data (that is, if EPA Method 24/311 value is higher), EPA Method 24/311 test shall govern unless after consultation, the permittee could demonstrate to the satisfaction of DEQ or EPA that the formulation data were correct.

- 17.b.v. Sampling procedures shall 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)
18. Appendix A attachment contains a cross reference for the applicability of the General Provisions of 40 CFR Part 63 to Subpart JJ which affects emissions unit EU-01 at this facility.

Emissions Unit EU-02 Requirements:

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(4)	19	Visible emissions	20% opacity	6-minute block average	NA	20
340-226-0210(2)(b)	21	PM	0.14 gr/dscf	Avg. of 3 test runs	NA	22

VISIBLE EMISSIONS

19. The permittee must comply with the following visible emission limits: [OAR 340-208-0110(4)]
- 19.a. Any visible emissions may not equal or exceed an average of 20 percent opacity; and
- 19.b. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 9.b.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by:
- 19.b.i. EPA Method 9; or
- 19.b.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
- 19.b.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.
20. **Monitoring and Recordkeeping Requirement:** The permittee shall provide the Western Region-Salem Office of DEQ with written notification within five days of all visible emission complaints received by the permittee during the operation of emissions unit EU-02, and shall maintain a log of each complaint. Documentation shall include date of contact, time of observed visible emission, description of visible emission, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative shall immediately investigate the condition following the receipt of the complaint and a plant representative shall provide a response to the complainant within 24 hours, if possible.

PARTICULATE MATTER

21. The permittee may not emit particulate matter emissions in excess of 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)]
22. **Monitoring and Recordkeeping Requirement:** The permittee shall provide the Western Region-Salem Office of DEQ with written notification within five days of all visible emission complaints received by the permittee during the operation of emissions unit EU-02, and shall maintain a log of each complaint. Documentation shall include date of contact, time of observed visible emission, description of visible emission, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative shall immediately investigate the condition following the receipt of the

complaint and a plant representative shall provide a response to the complainant within 24 hours, if possible.

Insignificant Activities Emission Limits and Standards

23. DEQ acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:

- 23.a. OAR 340-208-0110 (20% opacity)
 23.b. OAR 340-228-0210 (0.14 gr/dscf corrected to 12% CO₂ or 50% excess air for fuel burning equipment)
 23.c. OAR 340-226-0210 (0.14 gr/dscf for non-fugitive, non-fuel burning equipment)
 23.d. OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment)

Testing, Monitoring, and Recordkeeping Requirements: Unless otherwise specified in this permit or an applicable requirement, DEQ is not requiring 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 and perform the testing in accordance with DEQ's Source Sampling Manual.

PLANT SITE EMISSION LIMITS

24. The permittee must not cause or allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0035 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (Tons/year)
CO	99
NO _x	39
VOC	249

- 24.a. The PSEL is based on the predicted emissions for the current operating conditions at the facility. A permit modification is required before the PSEL may be increased.
- 24.b. The above PSELs are 12 consecutive month rolling totals.
25. **Monitoring Requirement:** The permittee shall determine compliance with the PSELs in Condition 24 in accordance with the following material balance recordkeeping procedures and calculations:
- 25.a. The permittee shall maintain monthly records of the amount of each coating and solvent used, the density of the coating or solvent, and the VOC content of the coating or solvent.

- 25.a.i. The VOC content of each coating or solvent shall be determined by certified product data sheets (mid-range value) or EPA Method 24.

- 25.a.ii. Compliance with the VOC PSEL in Condition 24 shall be calculated using the following equation:

$$E = [\sum(C_i \times d_i \times \text{VOC}_i) - \text{VOC}_h \times Q_h - \text{VOC}_{nh} \times Q_{nh}] \times 0.0005 + \text{AI}$$

Where:

E = volatile organic compound emissions (ton/mo and ton/yr)

C_i = amount of coating or solvent material i used in the process (gallons/mo and

gallons/yr)
 d_i = density of coating or solvent material i used in the process (lb/gallon)
 VOC_i = weight fraction VOC in coating or solvent material i (wt/wt)
 VOC_h = density of coatings or solvents shipped off-site as hazardous waste (lb VOC/gallon)
 Q_h = quantity of coatings or solvents shipped off-site as hazardous waste (gallons)
 VOC_{nh} = density of coatings or solvents shipped off-site as non-hazardous waste (lb VOC/gallon)
 Q_{nh} = quantity of coatings or solvents shipped off-site as non-hazardous waste (gallons)
 $AI = 1$ ton/year

- 25.b. The permittee shall maintain monthly records of the amount of natural gas used in EU-02 and calculate compliance with the CO and NO_x PSELs in Condition 23 using the following equation:

$$E = EF \times Q_{ng} \times 0.0005$$

Where:

E = emissions of NO_x or CO (tons/mo and ton/yr)
 EF = emission factor for NO_x is 100 lb/MM ft³ NG
 emission factor for CO is 84 lb/MM ft³ NG
 Q_{ng} = quantity of natural gas burned (MM ft³)

- 25.c. Unless otherwise stated, all emissions calculations shall be performed within 30 days following the end of each month.
- 25.d. Recordkeeping: The permittee shall maintain monthly and annual records of the following process parameters:

Process Parameter	Units
Coatings usage	Gallons/month and gallons/year
Solvent usage	Gallons/month and gallons/year
Densities of all coatings and solvents used	Pounds/gallon
VOC and HAP content of all coatings and solvents used	Weight percent or pounds/gallon
Amount of hazardous and non-hazardous waste coatings or solvents shipped off-site	Gallons/month and gallons/year
Densities of hazardous and non-hazardous waste coatings or solvents shipped off-site	Pounds/gallon
Certified product data sheets	N/A
Natural gas usage	Cubic feet/month and cubic feet/year

EMISSION FEES

26. Emission fees will be based on the Plant Site Emissions Limits, unless permittee elects to report actual emissions for one or more permitted processes/pollutants. [OAR 340-220-0090]

GENERAL TESTING REQUIREMENTS

27. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ’s Source Sampling Manual. [OAR 340-212-0120]
- 27.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to DEQ at least 30 days prior to the date of the test. The test plan must be prepared in

accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. Permittee should be aware, if significant variations are requested, it may require more than 30 days for DEQ to grant approval and may require EPA approval in addition to approval by DEQ.

- 27.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.
- 27.c. Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:
 - 27.c.i. At least 90% of the design capacity for new or modified equipment;
 - 27.c.ii. At least 90% of the maximum operating rate for existing equipment; or
 - 27.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as 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.
- 27.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, DEQ may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 27.e. Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to DEQ within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Title V Monitoring Requirements

- 28. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
- 29. The permittee must use the same methods 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)]
- 30. The permittee must comply with the monitoring requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

General Title V Recordkeeping Requirements

- 31. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
 - 31.a. The date, place as defined in the permit, and time of sampling or measurements;
 - 31.b. The date(s) analyses were performed;
 - 31.c. The company or entity that performed the analyses;
 - 31.d. The analytical techniques or methods used;
 - 31.e. The results of such analyses;

- 31.f. The operating conditions as existing at the time of sampling or measurement; and
 - 31.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
32. 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) will 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 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 will not be considered a missing record. [OAR 340-214-0110, 340-214-0114, and 340-218-0050(3)(b)]
33. The permittee must comply with the recordkeeping requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
34. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon 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(b)(B)]

REPORTING REQUIREMENTS

General Title V Reporting Requirements

35. **Excess Emissions Reporting:** The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]
- 35.a. Immediately (by 9:00 AM the next business day) notify DEQ of an excess emission event by phone, email, or facsimile; and
 - 35.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]
 - 35.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
 - 35.b.ii. The date and time the permittee notified DEQ of the event;
 - 35.b.iii. The equipment involved;
 - 35.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - 35.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - 35.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
 - 35.b.vii. The final resolution of the cause of the excess emissions; and
 - 35.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.
 - 35.c. 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 DEQ by calling the Oregon Accident Response System (OARs). The current number is 1-800-452-0311.

- 35.d. 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 DEQ for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by DEQ 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.
- 35.e. The permittee must notify DEQ of planned startup/shutdown or scheduled maintenance events.
- 35.f. The permittee must continue to maintain a log of all excess emissions in accordance with OAR 340-214-0340(3). 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)]
36. **Permit Deviations 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" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in OAR 340-214-0300 through 340-214-0360 must be reported in accordance with Condition 35.
37. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
38. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

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

DEQ – Western Region 4026 Fairview Industrial Dr. SE Salem, OR 97302 503-378-8240	DEQ – Air Quality Division 700 NE Multnomah St., Suite 600 Portland, OR 97232 503-229-5359	Air Operating Permits US Environmental Protection Agency Mail Stop OAQ-108 1200 Sixth Avenue Seattle, WA 98101
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Semi-annual and Annual Title V Reports

39. The permittee shall submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by DEQ. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report shall be submitted to the Air Quality Division, two copies to the regional office, and one copy to the EPA. All instances of deviations from permit requirements shall be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 39.a. The first semi-annual report shall be due on July 30 and shall include the following:
- 39.a.i. the first semi-annual compliance certification; [OAR 340-218-0080]
- 39.a.ii. total coated finished product (sqft). Square footage may be estimated using an average size cabinet as basis;
- 39.a.iii. type and amount of coatings and solvents used (gal) with the weight per gallon, percent VOC and HAP by weight, lbs VOC/lbs solids, and lbs HAP/lbs solids on an

- “as applied” basis;
- 39.a.iv. type and amount of coatings and solvents shipped off-site as hazardous or non-hazardous waste (gal) with the weight per gallon and the percent VOC by weight;
 - 39.a.v. maximum monthly amount and 12 month rolling total amount of VOC emitted, from monthly inventory and production records;
 - 39.a.vi. report the method of coating application for each coating type. Report the gallons of each type of coating which were applied with conventional air spray technology. For any solvent-based coating that was applied with a conventional air spray technology, explain why a higher transfer efficiency technology was not used;
 - 39.a.vii. a statement that high efficiency transfer technology, including new application methods introduced during the year, is being used throughout the plant. Identify any application enhancements implemented during the year;
 - 39.a.viii. semi-annual records of raw materials used (coating and solvent quantities, density, and VOC and HAP content); and
 - 39.a.ix. semi-annual VOC and HAPs emission report including the quantity and VOC and HAPs percent of each raw material used that contains VOC and HAPs.
- 39.b. The annual report shall be due on February 15 and shall consist of the following:
- 39.b.i. the emission fee report; [OAR 340-220-0100]
 - 39.b.ii. the excess emissions upset log; [OAR 340-214-0340]
 - 39.b.iii. the second semi-annual compliance certification; [OAR 340-218-0080]
 - 39.b.iv. type and amount of coatings and solvents used (gal) with the weight per gallon, percent VOC and HAP by weight, lbs VOC/lbs solids, and lbs HAP/lbs solids on an “as applied” basis;
 - 39.b.v. type and amount of coatings and solvents shipped off-site as hazardous or non-hazardous waste (gal) with the weight per gallon and the percent VOC by weight;
 - 39.b.vi. maximum monthly amount and 12 month rolling total amount of VOC emitted, from monthly inventory and production records;
 - 39.b.vii. report the method of coating application for each coating type. Report the gallons of each type of coating which were applied with conventional air spray technology. For any solvent-based coating that was applied with a conventional air spray technology, explain why a higher transfer efficiency technology was not used;
 - 39.b.viii. a list of all major maintenance performed on air pollution control equipment;
 - 39.b.ix. a statement that high efficiency transfer technology, including new application methods introduced during the year, is being used throughout the plant. Identify any application enhancements implemented during the year;
 - 39.b.x. annual records of raw materials used (coating and solvent quantities, density, and VOC and HAP content);

- 39.b.xi. annual VOC and HAPs emission report including the quantity and VOC and HAPs percent of each raw material used that contains VOC and HAPs;
 - 39.b.xii. nuisance complaint log regarding air quality and fugitive dust or visible emission complaints;
 - 39.b.xiii. The monthly and annual PSEL calculation (annual rolling totals for each month);
 - 39.b.xiv. annual natural gas usage (cubic feet); and
 - 39.b.xv. the annual emission inventory report for the prior calendar year (Form R1001).
40. The semi-annual compliance certification shall include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
- 40.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 40.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 into the permit. When certifying compliance with new applicable requirements that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the permittee 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;
 - 40.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 40.b of this rule. 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; and
 - 40.d. Such other facts as DEQ may require to determine the compliance status of the source.
41. Greenhouse Gas Registration and Reporting: If the calendar year emission rate of greenhouse gases (CO₂e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5).
42. Notwithstanding any other provision contained in any applicable requirement, the owner or operator 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)]

NESHAP Reporting Requirements

43. The permittee shall demonstrate continuous NESHAP compliance by submitting a semi-annual report covering the previous six months of wood furniture manufacturing operations:
- 43.a. Reports shall be submitted February 15 and July 30 covering the reporting periods of July 1

through December 31 and January 1 through June 30 respectively.

- 43.b. The semi-annual reports shall include a statement of whether the source was in compliance or noncompliance, and if the source was in noncompliance, the measures taken to bring the source into compliance, and the following information:
- 43.b.i. If complying with the provisions of Condition 12.a through the procedures established in Condition 13.a.i, the permittee shall demonstrate continuous compliance by submitting the results of the averaging calculation for each month within that semi-annual period and submitting a compliance certification with the semi-annual report. The compliance certification shall state that the value of (E), as calculated in Condition 13.a.i, is no greater than 0.8. The permittee is in violation of the standard if (E) is greater than 1.0 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 permittee can demonstrate through records that the violation of the monthly average can be attributed to a particular day or days during the period.
- 43.b.ii. If complying with the provisions of Condition 12.a. through the procedures established in Condition 13.a.ii., the permittee shall demonstrate continuous compliance by using compliant coatings and thinners, maintaining records that demonstrate the coatings and thinners are compliant, and submitting a compliance certification with the semi-annual report. The compliance certification shall 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 non-compliant coating, as demonstrated by records or by a sample of the coating, is used.
- 43.b.iii. If complying with the provisions of Condition 12.b. through the procedures established in Condition 13.b., the permittee shall submit a compliance certification with the semi-annual report. The compliance certification shall state that compliant contact and/or foam adhesives have been used each day in the semi-annual reporting period, or should otherwise identify each day non-compliant contact and/or foam adhesives were used. Each day a non-compliant contact or foam adhesive is used is a single violation.
- 43.b.iv. In complying with the provisions of Condition 12.c., the permittee shall submit a compliance certification with the semi-annual report. The compliance certification shall state that compliant strippable spray booth coatings have been used each day in the semi-annual reporting period, or should otherwise identify each day non-compliant materials were used. Each day a non-compliant strippable spray booth coating is used is a single violation.
- 43.b.v. In complying with the provisions of Condition 15, the permittee shall submit a compliance certification with the semi-annual report. The compliance certification shall state that the work practice standards required by Condition 15 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 CFR63.804(g)]
- 43.c. The frequency of the reports required by this condition shall not be reduced from semi-annually regardless of the history of the permittee's compliance status. [40 CFR 63.807(c)]

44. Any change in the information already provided under Condition 43 shall be provided to DEQ and the EPA Administrator in writing within 15 calendar days after the change. [40 CFR 63.9(j)]

Other Title V Reporting Requirements

45. All required reports shall be certified by a responsible official consistent with OAR 340-218-0040(5);[OAR 340-218-0050(3)(c)(D)]

46. Reporting requirements shall commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

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

Submit all Notices and applications that do not include payment to the Western Region’s Permit Coordinator.

Submit all reports (annual reports, source test plans and reports, etc.) to DEQ’s Western Region. If you know the name of the Air Quality staff member responsible for your permit, please include it.

DEQ – Western Region
4026 Fairview Industrial Dr. SE
Salem, OR 97302
(503) 378-8240

Submit payments for invoices, applications to modify the permit, and any other payments to DEQ’s Business Office:

DEQ – Air Quality Division
700 NE Multnomah St., Suite 600
Portland, OR 97232
503-229-5359

Submit all reports for EPA requirements to:

Air Operating Permits
US Environmental Protection Agency
Mail Stop OAQ-108
1200 Sixth Avenue
Seattle, WA 98101

NON-APPLICABLE REQUIREMENTS

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

Applicable Requirement	Reason Code	Applicable Requirement	Reason Code	Applicable Requirement	Reason Code	Applicable Requirement	Reason Code
OAR Chapter 340:		0130	h	All rules	b	40 CFR	
Division 202:		0160	f	Division 238:		Part 55	b
all rules	i	0170	h	All rules	e	Part 57	b
Division 206:		Division 222		Division 240:		Part 60, except subpart A and appendixes	b
0050	c	0060	h	All rules	c		
Division 208:		Division 226:		Division 242:		Part 61, except subparts A and M and appendixes	b
0500 through 0630	d	0400	h	All rules	c		
Division 210:		Division 228:		Division 244:		Part 63, except subparts A and JJ and appendixes	b
0100 through 0120	b	0100 through 0130	f	0110 through 0180	h		
Division 214:		0300	b	0210 through 0230	b		
0200 through 0220	c	Division 230:		Division 256:		Part 68	b
Division 218:		All rules	e	0130	b	Part 72 through 78	b
0050(4)	b	Division 232:		0200 through 0470	b	Part 82, except subpart F	b
0050(8)	h	All rules	c	Division 258:		Part 85 through 89	b
0090	b	Division 234:		All rules	b		
0100	b	All rules	b	Division 260:			
Division 220		Division 236:		0030 and 0040	b		

Reason code definitions:

a	this pollutant is not emitted by the facility
b	the facility is not in this source category
c	the facility is not in a special control/nonattainment area
d	the facility is not in this county
e	the facility does not have this emissions unit
f	the facility does not use this fuel type
g	the rule does not apply because no changes have been made at the facility that would trigger these procedural requirements
h	this method/procedure is not used by the facility
i	this rule applies only to DEQ and regional authorities
j	there are no emissions units with add-on control devices or the pre-controlled potential emissions are less than 100 tons per year or the emissions units with add-on control devices and pre-controlled emissions greater than 100 tons per year are subject to emissions standards promulgated after November of 1990

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 must comply with all conditions of this 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 is supplemental to, and does 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 must 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. [OAR 340-208-0400] This condition is enforceable only by the State.

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. [OAR 340-214-0120]

G7. **Certification** [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to DEQ 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 DEQ a material error or omission in these records, reports, plans, or other documents.

G8. **Open Burning** [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0200.

G9. **Asbestos** [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, 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. DEQ, 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 DEQ);
 - 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 DEQ 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 DEQ.

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

DEQ, 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 an Oregon 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 state 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 particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to DEQ, Financial Services, 700 NE Multnomah St., Suite 600, Portland, OR 97232, within 30 days of date DEQ 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 DEQ. Payment must be made regardless of the dispute. User-based fees will 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 OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to DEQ 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 does 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 DEQ and the EPA in accordance with OAR 340-218-0140(3)(b).

- c. The permit shield of Condition G11 does 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 DEQ prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

G21. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) from DEQ and having satisfied the requirements of OAR 340, Division 224.

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 OAR 340-214-0110]

The permittee must furnish to DEQ, within a reasonable time, any information that DEQ 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 DEQ copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to DEQ 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 DEQ.
- 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 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 DEQ requests an earlier submittal. If more than 12 months is required to process a permit renewal application, DEQ 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 will 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 340-200-0020 and 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 [OAR 340-200-0020 and 340-218-0120(2)]

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

ALL INQUIRIES SHOULD BE DIRECTED TO:

DEQ- Western Region
4026 Fairview Industrial Dr. SE
Salem, OR 97302
503-378-8240

Appendix A

40 CFR Part 63 Subpart JJ General Provision Cross Reference Table

Table 1 to Subpart JJ of Part 63—General Provisions Applicability to Subpart JJ

Reference	Applies to subpart JJ	Comment
63.1(a)	Yes	
63.1(b)(1)	No	Subpart JJ specifies applicability.
63.1(b)(2)	Yes	
63.1(b)(3)	Yes	
63.1(c)(1)	No	Subpart JJ specifies applicability.
63.1(c)(2)	No	Area sources are not subject to subpart JJ.
63.1(c)(4)	Yes	
63.1(c)(5)	Yes	
63.1(e)	Yes	
63.2	Yes	Additional terms are defined in 63.801(a) of subpart JJ. When overlap between subparts A and JJ occurs, subpart JJ takes precedence.
63.3	Yes	Other units used in subpart JJ are defined in 63.801(b).
63.4	Yes	
63.5	Yes	
63.6(a)	Yes	
63.6(b)(1)	Yes	
63.6(b)(2)	Yes	
63.6(b)(3)	Yes	
63.6(b)(4)	No	May apply when standards are proposed under Section 112(f) of the CAA.
63.6(b)(5)	Yes	
63.6(b)(7)	Yes	
63.6(c)(1)	Yes	
63.6(c)(2)	No	
63.6(c)(5)	Yes	
63.6(e)(1)(i)	No	See § 63.802(c) for general duty requirement.
63.6(e)(1)(ii)	No.	
63.6(e)(1)(iii)	Yes.	
63.6(e)(2)	No	Section reserved.
63.6(e)(3)	No.	
63.6(f)(1)	No	Affected sources complying through the procedures specified in 63.804 (a)(1), (a)(2), (b), (c)(1), (d)(1), (d)(2), (e)(1), and (e)(2) are subject to the emission standards at all times, including periods of startup, shutdown, and malfunction.
63.6(f)(2)	Yes	
63.6(f)(3)	Yes	
63.6(g)	Yes	
63.6(h)	No	
63.6 (i)(1)-(i)(3)	Yes	
63.6(i)(4)(i)	Yes	
63.6(i)(4)(ii)	No	
63.6 (i)(5)-(i)(14)	Yes	
63.6(i)(16)	Yes	
63.6(j)	Yes	
63.7(a)-(d)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.7(e)(1)	No	See § 63.805(a)(1).

63.7(e)(2)-(e)(4)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(a)-(b)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(c)(1)(i)	No.	
63.8(c)(1)(ii)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(c)(1)(iii)	No.	
63.8(c)(2)-(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.8(d)(3)	Yes, except for last sentence	Applies only to affected sources using a control device to comply with the rule.
63.8(e)-(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(a)	Yes	
63.9(b)	Yes	Existing sources are required to submit initial notification report within 270 days of the effective date.
63.9(c)	Yes	
63.9(d)	Yes	
63.9(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(f)	No	
63.9(g)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.9(h)	Yes	63.9(h)(2)(ii) applies only to affected sources using a control device to comply with the rule.
63.9(i)	Yes	
63.9(j)	Yes	
63.10(a)	Yes	
63.10(b)(1)	Yes	
63.10(b)(2)(i)	No.	
63.10(b)(2)(ii)	No	See § 63.806(k) for recordkeeping of occurrence and duration of malfunctions and recordkeeping of actions taken during malfunctions.
63.10(b)(2)(iii)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(2)(iv)-(b)(2)(v)	No.	
63.10(b)(2)(vi)-(b)(2)(xiv)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(b)(3)	Yes	
63.10(c)(1)-(9)	Yes.	
63.10(c)(10)-(11)	No	See § 63.806(k) for recordkeeping of malfunctions.
63.10(c)(12)-(14)	Yes.	
63.10(c)(15)	No.	
63.10(d)(1)	Yes	
63.10(d)(2)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(d)(3)	No	
63.10(d)(4)	Yes	
63.10(d)(5)	No	See § 63.807(c)(3) for reporting of malfunctions.
63.10(e)	Yes	Applies only to affected sources using a control device to comply with the rule.
63.10(f)	Yes	
63.11	No	
63.12-63.15	Yes	

[60 FR 62936, Dec. 7, 1995, as amended at 76 FR 72074, Nov. 21, 2011]



State of Oregon
Department of
Environmental
Quality

**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
OREGON TITLE V OPERATING PERMIT
REVIEW REPORT for apci Wood Products, LLC**

Western Region
4026 Fairview Industrial Dr. SE
Salem, OR 97302

Source Information:

SIC	2434
NAICS	337110

Source Categories (Part and code)	NA
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Compliance and Emissions Monitoring Requirements:

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

COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements:

Annual report (due date)	Feb 15
Emission fee report (due date)	Feb 15
SACC (due date)	Feb 15, July 30

Quarterly report (due dates)	
Monthly report (due dates)	
Excess emissions report	X
Other reports (type)	

Air Programs:

NSPS (list subparts)	
NESHAP (list subparts)	A, JJ
CAM	
Regional Haze (RH)	
Synthetic Minor (SM)	
Part 68 Risk Management	
CFC	
RACT	

TACT	
Title V	X
ACDP (SIP)	
Major HAP source	X
Federal major source	
NSR	
PSD	
Acid Rain	

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LIST OF ABBREVIATIONS USED IN THIS REVIEW REPORT

AQMA	Air Quality Management Area	N ₂ O	nitrous oxide (greenhouse gas)
ASTM	American Society of Testing and Materials	NA	not applicable
BDT	bone dry ton	NESHAP	National Emission Standard for Hazardous Air Pollutants
CEMS	continuous emissions monitoring system	NO _x	oxides of nitrogen
CFR	Code of Federal Regulations	NSPS	New Source Performance Standard
CH ₄	methane (greenhouse gas)	NSR	New Source Review
CMS	continuous monitoring system	O ₂	oxygen
CO	carbon monoxide	OAR	Oregon Administrative Rules
CO _{2e}	carbon dioxide equivalent	ORS	Oregon Revised Statutes
COMS	continuous opacity monitoring system	O&M	operation and maintenance
DEQ	Oregon Department of Environmental Quality	Pb	lead
dscf	dry standard cubic feet	PCD	pollution control device
EF	emission factor	PEMS	predictive emissions monitoring system
EPA	United State Environmental Protection Agency	PM	particulate matter
EU	emissions unit	PM ₁₀	particulate matter less than 10 microns in size
FCAA	Federal Clean Air Act	PM _{2.5}	particulate matter less than 2.5 microns in size
GHG	greenhouse gas	PSD	Prevention of Significant Deterioration
gr/dscf	grains per dry standard cubic feet	PSEL	Plant Site Emission Limit
HAP	hazardous air pollutant	SO ₂	sulfur dioxide
ID	identification code	ST	source test
I&M	inspection and maintenance	VE	visible emissions
MB	material balance	VMT	vehicle mile traveled
Mlb	1000 pounds	VOC	volatile organic compound
MM	million		

INTRODUCTION

1. The existing Title V Permit was reopened by DEQ to revise material mistakes related to establishing a carbon monoxide Plant Site Emission Limit that were discovered during annual report review. The current permit was issued on August 2, 2018, and is scheduled to expire on August 1, 2023. The permit will be reopened for cause per OAR 340-218-0200(1)(a)(D).
2. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION

3. acpi Wood Products, LLC (formally known as Elkay Wood Products) manufactures wood kitchen cabinets and bathroom vanities in Independence, Oregon. The facility was constructed in 2001 and began operation on October 5, 2001. The facility was bought out by acpi Wood Products, LLC, and submitted a request for an administrative amendment to change the facility's name on March 22, 2019. The new permit will be issued to acpi Wood Products, LLC.

EMISSION UNITS AND FACILITY DESCRIPTION

4. During the renewal, the facility's emission data for space heaters and process heaters were updated. There are 14 natural gas space heaters located throughout the facility with an aggregate rating of 1.3 MMBtu/hr. The facility also has five natural gas-fired process heat units rated at 1.1 MMBtu/hr each and one rated at 0.075 MMBtu/hr. These units are mainly used to sustain the temperature for the curing process.

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING

STATE REQUIREMENTS

5. **Division 222-0020** – Stationary Source Plant Site Emission Limits:
Plant Site Emission Limits (PSEL) are required for all pollutants above the de minimis level in accordance with DEQ rules. Based on the calculations, potential CO emissions from natural gas space heaters (EU-02) were 2.48 tpy, which exceeded de minimis level one tpy of for CO per OAR 340-200-0020(39).

Even though PSEL for CO should have been added during the last renewal, it was left off erroneously. Because potential emissions for CO is less than SER, a generic PSEL of 99 tons per year will be added per OAR 340-222-0040 for this modification.

PLANT SITE EMISSION LIMITS (PSEL)

6. The Plant Site Emission Limits are as follows:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			Capacity (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)	
PM	0	0	0	NA	NA	NA	NA
PM ₁₀	0	0	0	NA	NA	NA	NA
PM _{2.5}	0	0	0	NA	NA	NA	NA
CO	0	0	0	NA	99	99	2.48
NO _x	0	0	0	39	39	0	2.98

SO ₂	0	0	0	NA	NA	NA	NA
VOC	0	249	249	249	249	0	248
GHG (CO ₂ e)	1880	1880	1880	NA	NA	NA	NA

- 6.a. The PSELs for NO_x and CO have been set at the Department's Generic PSEL levels in accordance with Department rules since the projected emission levels are less than the Generic PSEL level.
- 6.b. After re-evaluating CO emissions from the natural gas-fired heaters, the CO emissions were above the de minimis level. Therefore, the PSEL for CO was added accordingly.

EMISSIONS DETAIL SHEETS

7. Emissions calculation details for individual devices and emissions units were provided at the last renewal. CO emissions in the detail sheets are correct and no changes are necessary.

REOPENING FOR CAUSE

8. For this modification, the permit was reprinted in its entirety because this modification was triggered by an error rather than facility's change in the equipment or operation. Because the current permit was renewed incorrectly, DEQ will reissue updated version of the permit.
9. In accordance with OAR 340-218-0200, Conditions 24, 25 b, and 39 b.xiii of Oregon Title V Operating Permit No. 27-0005-TV-01 are revised as follows:

24. The permittee must not cause or allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0035 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (Tons/year)
CO	99
NO _x	39
VOC	249

- 25 b. The permittee shall maintain monthly records of the amount of natural gas used in EU-02 and calculate compliance with the **CO and NO_x** PSELs in Condition 23 using the following equation:

$$E = EF \times Q_{ng} \times 0.0005$$

Where:

E = emissions of NO_x or CO (tons/mo and ton/yr)

EF = emission factor for NO_x is 100 lb/MM ft³ NG

emission factor for CO is 84 lb/MM ft³ NG

Q_{ng} = quantity of natural gas burned (MM ft³)

- 39.b. The annual report shall be due on February 15 and shall consist of the following:

...

39.b.xiii. The monthly and annual PSEL calculation (annual rolling totals for each month);

PUBLIC NOTICE

10. This permit will be put on public notice from May 3, 2019 to June 10, 2019. Comments may be submitted in writing during the comment period. DEQ will hold a public hearing if requested by 10 or more individuals or one person representing a group of 10 or more individuals. After the comment period and hearing, if requested, DEQ will review the comments and modify the permit as may be appropriate. A proposed permit will be sent to EPA for a 45 day review period. DEQ may request and EPA may agree to

an expedited review of 5 days if there were no substantive or adverse comments during the comment period.

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