

Public Notice

DEQ Requests Comments on RUSCO's Proposed Air Quality Permit

The Oregon Department of Environmental Quality invites the public to submit written comments on the conditions of RUSCO, Inc.'s proposed air quality permit, known officially as Simple Air Contaminant Discharge Permit.

Summary

DEQ received an application to renew the permit from RUSCO on June 14, 2019. This permit renewal includes federal emission standards for surface coating and plating and polishing operations.

How do I participate?

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

DEQ Northwest Region
Air Quality Permit Coordinator
700 NE Multnomah St., Ste 600
Portland, OR 97232

Fax: 503-229-6945

Email: NWRAQPermits@deq.state.or.us

Written comments are due by 5 p.m. Friday Oct. 30, 2020.

About the facility

RUSCO operates a metal finishing business providing spray and powder coating operations along with liquid painting of aluminum parts. The facility is located at 4466 NW Yeon Avenue in Portland. Operations include a chromate conversion line, which puts a coating on the aluminum to prevent corrosion and serves as a primer for paint and five combined paint booth/ovens.

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.

DEQ conducts periodic onsite inspections of the facility, and reviews annual reports to ensure compliance with permit conditions.

What happens after the public comment period ends?

Once the comment period closes, DEQ will respond to any comments received and may make revisions to the permit in response to the comments received. If DEQ receives no comments, or once DEQ addresses comments and makes required changes to the permit, the permit will be issued for a period of five years.

Where can I get more information?

Find out more and view the application at <https://go.usa.gov/xEJf2>, or contact the Northwest Region Air Quality Permit Coordinator at:

Phone: 503-229-5582 or 800-452-4011

Fax: 503-229-6945

Email: nwraqpermits@deq.state.or.us

You can also view the application and related documents in person at the DEQ office in Portland. For a review appointment, call the Northwest Region Air Quality Permit Coordinator at 503-229-5582.

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

Northwest Region
Air Quality Program
700 NE Multnomah St.
Suite 600
Portland, OR 97232

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Fax: 503-229-6945

Contact: Owen Rudloff,
Permit Writer

www.oregon.gov/DEQ

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

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/yr)	Proposed Limit (tons/yr)
Volatile organic compounds	39	39

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

Hazardous air pollutants:

RUSCO is not a major source of hazardous air pollutants, however EPA has determined businesses similar to this facility, as a group, emit enough hazardous air pollutants to warrant regulation. Therefore, this source is subject to the following National Emission Standard for Hazardous Air Pollutants: subpart HHHHHH for Surface Coating and Paint Stripping, and subpart WWWWWW for Plating and Polishing operations. More detailed information can be found in the review report.

For more information about hazardous air pollutants, go to: <https://www.epa.gov/haps/health-effects-notebook-hazardous-air-pollutants>

**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY****SIMPLE****AIR CONTAMINANT DISCHARGE PERMIT**

Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

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

ISSUED TO:

RUSCO, Inc.
abn Dura Industries
PO Box 10762
Portland, Oregon 97296

INFORMATION RELIED UPON:

Application No.: 030789
Date Received: 06/14/2019

PLANT SITE LOCATION:

4466 NW Yeon Avenue
Portland, Oregon 97210

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Portland
Approval Date: 11/14/1998

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Steven A. Dietrich, Northwest Region Air Quality Manager

Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-8010):

Table 1 Code	Source Description	SIC/NAICS
Part B, 65	Plating and polishing operations subject to an area source NESHAP under OAR 340 division 244	Primary 3471 Secondary 3479 /332812

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1.0 DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

The devices, processes, and pollution control devices regulated by this permit are the following:

Devices and Processes Description	Pollution Control Device Description
(4) Spray painting booths with (3) natural gas-fired drying ovens	Paint booth filters
(1) Powder booth with (1) natural gas-fired drying ovens	NA
Categorically Insignificant Activities	
Solvent recycler	NA
Chromate conversion pretreatment tank	NA
Wastewater evaporator	NA

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must not allow emissions from any devices or processes, including the natural gas-fired ovens and spray paint booths, to equal or exceed 20% opacity. This limit does not apply to fugitive emission sources. Opacity must be measured as a six-minute block average using EPA Method 9 or an alternative monitoring method approved by DEQ that is equivalent to EPA Method 9. [OAR 340-208-0110(3)(b), and (4)]

2.2. Fugitive Emissions

- a. The permittee must take reasonable precautions to prevent fugitive dust emissions from leaving the property of a source. Reasonable precautions include, but are not limited to: [OAR 340-208-0210]
 - i. Installing and using hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - ii. Installing adequate containment during sanding or other similar operations;
 - iii. Promptly removing earth or other material that does or may become airborne from paved streets; and

- iv. Developing a DEQ approved fugitive emission control plan upon request by DEQ if the above precautions are not adequate and implementing the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
- b. In no case may fugitive dust emissions leave the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured monthly by EPA method 22 with the minimum observation time of six minutes.

2.3. Particulate Matter Emissions

The permittee must comply with the following particulate matter emission limits. For fuel burning equipment, emission results are corrected to 50% excess air.

- a. Particulate matter emissions from the natural gas-fired ovens installed before April 16, 2015, must not exceed 0.14 grains per dry standard cubic foot. [OAR 340-228-0210(2)(b)(B)]
- b. Particulate matter emissions from the spray paint booths installed before April 16, 2015, must not exceed 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)(B)]
- c. Non-fugitive particulate matter emissions from processes listed in OAR 340-226-0300 must not exceed the process weight emission standards shown in Table 1 of OAR 340-226-0310.
- d. Particulate matter emissions from any fuel burning equipment that is installed, constructed or modified on or after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot, corrected to 12% CO₂ or 50% excess air. [OAR 340-228-0210(2)(c)]
- e. Particulate matter emissions from any non-fuel burning equipment that is installed, constructed or modified after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2)(c)]

2.4. Particulate Matter Fallout

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]

2.5. Nuisance and Odors

The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. The permittee must maintain a log of each nuisance complaint received by the permittee. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and provide a response to the complainant within 24 hours, if possible. [OAR 340-208-0300]

2.6. Fuels

The permittee must not use any fuels other than natural gas.

3.0 SPECIAL CONDITIONS

The permittee must submit a permit modification application as required by Condition 10.2 and receive DEQ approval before any mixture containing hexavalent chromium can be used in the chromate conversion pretreatment tank.

4.0 SPECIFIC PERFORMANCE AND EMISSION STANDARDS

4.1. Reasonably Available Control Technology (RACT) Synthetic Minor

The permittee must ensure that VOC emissions from the surface coating of metal parts and products do not exceed a rate of 9 tons in any consecutive 12-month period. The permittee must inform DEQ, in writing, within 7 days of the discovery of any exceedance of this limit. [OAR 340-232-0160]

5.0 OPERATION AND MAINTENANCE REQUIREMENTS

5.1. General Work Practices

The permittee must ensure the following work practices are met: [OAR 340-226-0120]

- a. Spent or fresh VOC containing materials not in use, must be stored in closed containers;
- b. All used rags containing solvent must be stored in closed containers; and
- c. All chemical conversion coatings used in the chromate conversion pretreatment tank must be hexavalent chromium-free.

5.2. 40 CFR Part 63 Subpart HHHHHH National Emission Standards for Hazardous Air Pollutants: Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources

- a. The permittee must achieve compliance with this permit condition for each of the following existing affected sources it operates (as applicable): [40 CFR 63.11171 and 40 CFR 63.11180]
 - i. Mixing rooms and equipment;
 - ii. Spray booths, ventilated prep stations, curing ovens, and associated equipment;

- iii. Spray guns and associated equipment;
 - iv. Spray gun cleaning equipment; and
 - v. Equipment used for storage, handling, recovery, or recycling of cleaning solvent or waste paint;
- b. If the permittee installs a new affected source, as listed above, the affected source must be in compliance with this permit condition upon startup.
- c. For the purpose of this permit, the following definitions apply, in addition to the definitions in 40 CFR 63.11180:
- i. “Target HAP” means compounds of chromium (Cr), lead (Pb), manganese (Mn), nickel (Ni), or cadmium (Cd);
 - ii. “Target HAP containing coating” means a spray-applied coating that contains any target HAP that is an OSHA - defined carcinogen [29 CFR 1910.1200(d)(4)] at a concentration greater than 0.1 percent by mass, or greater than 1.0 percent by mass for any other individual target HAP compound;
- d. The permittee may rely upon formulation data provided by the manufacturer or supplier, such as the Safety Data Sheet, provided it represents each target HAP compound in the material that is present at 0.1 percent by mass or more for OSHA defined carcinogens and at 1.0 percent by mass or more for other target HAP compounds, for the purpose of determining whether materials in use contain the target HAP compounds;
- e. The permittee must meet the following requirements: [40 CFR 63.11173(e)]
- i. All painters must be certified to have completed training in the proper spray application of surface coatings and the proper setup and maintenance of spray equipment;
 - ii. All spray-applied coatings must be applied in a spray booth, preparation station, or mobile enclosure that meets the requirements of Condition 5.2.e.ii.A and either 5.2.e.ii.B or 5.2.e.ii.C below:
 - A. All spray booths, preparation stations, and mobile enclosures must be fitted with a type of filter technology that is demonstrated to achieve at least 98-percent capture of particulate matter from paint overspray. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement. This condition does not apply to waterwash spray booths that are operated and maintained according to the manufacturer's specifications; and
 - B. Spray booths and preparation stations used to refinish mobile equipment must be fully enclosed with a full roof, and four complete walls or complete side curtains, and must be ventilated at negative pressure so that air is drawn into any openings in the booth walls or preparation station curtains. However, if a spray booth is fully enclosed and has seals on all doors and other openings and has an automatic pressure balancing system, it may be operated at up to, but not more than, 0.05 inches water gauge positive pressure; OR
 - C. Spray booths and preparation stations that are used to coat miscellaneous parts and products or vehicle subassemblies must have a full roof, at least three complete walls or complete side curtains, and must be ventilated so that air is drawn into the booth.

The walls and roof of a booth may have openings, if needed, to allow for conveyors and parts to pass through the booth during the coating process.

- iii. All spray-applied coatings must be applied with a HVLP spray gun, electrostatic application, airless spray gun, air-assisted airless spray gun, or an equivalent technology that is demonstrated by the spray gun manufacturer to achieve transfer efficiency comparable to one of the spray gun technologies listed, and for which written approval has been obtained from the EPA Administrator;
 - iv. All paint spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and paint residue is not created outside of a container that collects used gun cleaning solvent. Spray gun cleaning may be done with, for example, hand cleaning of parts of the disassembled gun in a container of solvent, by flushing solvent through the gun without atomizing the solvent and paint residue, or by using a fully enclosed spray gun washer. A combination of non-atomizing methods may also be used;
- f. The permittee must ensure and certify that all new and existing personnel, including contract personnel, who spray apply surface coatings are trained in the proper application of surface coatings. The training program must include the following items: [40 CFR 63.11173(f)]
- i. A list of all current personnel by name and job description who are required to be trained;
 - ii. Hands-on and classroom instruction that addresses, at a minimum, initial and refresher training in the topics listed below:
 - A. Spray gun equipment selection, set up, and operation, including measuring coating viscosity, selecting the proper fluid tip or nozzle, and achieving the proper spray pattern, air pressure and volume, and fluid delivery rate;
 - B. Spray technique for different types of coatings to improve transfer efficiency and minimize coating usage and overspray, including maintaining the correct spray gun distance and angle to the part, using proper banding and overlap, and reducing lead and lag spraying at the beginning and end of each stroke;
 - C. Routine spray booth and filter maintenance, including filter selection and installation;
 - D. Environmental compliance with the requirements of this condition;
 - iii. A description of the methods to be used at the completion of initial or refresher training to demonstrate, document, and provide certification of successful completion of the required training. If the permittee can show by documentation or certification that a painter's work experience and/or training has resulted in training equivalent to the training required above, it is not required to provide the initial required training;
 - iv. All personnel must be trained and certified no later than 180 days after hiring. Painter training that was completed within five years prior to the date training is required and that meets the requirements above, satisfies this requirement and is valid for a period not to exceed five years after the date the training was completed;

- v. Training and certification will be valid for a period not to exceed five years after the date the training is completed, and all personnel must receive refresher training that meets the requirements of this section and be re-certified every five years.

5.3. 40 CFR Part 63 Subpart WWWW Plating and Polishing Work Practices

For the chromate conversion pretreatment tank that contains, applies or emits one or more of the plating and polishing metal HAP, the permittee must implement the following applicable management practices, as practicable. [40 CFR 63.11507(g)]

- a. Minimize bath agitation when removing any parts processed in the tank, except when necessary to meet part quality requirements;
- b. Maximize the draining of bath solution back into the tank, by extending drip time when removing parts from the tank; using drain boards (also known as drip shields); or withdrawing parts slowly from the tank, as practicable;
- c. Optimize the design of barrels, racks and parts to minimize dragout of bath solution (such as by using slotted barrels and tilted racks, or by designing parts with flow-through holes to allow the tank solution to drip back into the tank);
- d. Use tank covers, if already owned and available at the facility;
- e. Minimize or reduce heating of process tanks, when doing so would not interrupt production or adversely affect part quality;
- f. Perform regular repair, maintenance, and preventive maintenance of racks, barrels, and other equipment associated with affected source;
- g. Minimize bath contamination, such as through the prevention or quick recovery of dropped parts, use of distilled/de-ionized water, water filtration, pre-cleaning of parts to be plated, and thorough rinsing of pretreated parts to be plated;
- h. Maintain quality control of chemicals, and chemical and other bath ingredient concentrations in the tanks;
- i. Perform general good housekeeping, such as regular sweeping or vacuuming, if needed, and periodic washdowns;
- j. Minimize spills and overflow of tanks;
- k. Use squeegee rolls in continuous or reel-to-reel plating tanks; and
- l. Perform regular inspections to identify leaks and other opportunities for pollution prevention.

5.4. General Provisions

The permittee must comply with the applicable General Provisions as noted in Table 1 and Table 2 at the end of this permit. [40 CFR 60.4218 and 40 CFR 63.11174]

5.5. Highest and Best Practicable Treatment and Control

The permittee must provide the highest and best practicable treatment and control of air contaminant emissions in every case so as to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling, and other deleterious factors at the lowest possible levels. The permittee must take corrective action to return to highest and best practicable treatment and control by checking the manometer on the side of each paint booth daily. If there is a red arrow on the gauge, the filter must be replaced on the same day that the red arrow was detected. [OAR 340-226-0100]

6.0 PLANT SITE EMISSION LIMITS**6.1. Plant Site Emission Limits (PSEL)**

The permittee must not cause or allow plant site emissions to exceed the following: [OAR 340-222-0040]

Pollutant	Limit	Units
VOC	39	tons/year
Single HAP	9	
Combined HAPs	24	

6.2. Annual Period

The annual Plant Site Emissions Limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

7.0 COMPLIANCE DEMONSTRATION**7.1. Monitoring Requirements**

The permittee must monitor the operation and maintenance of the facility and associated air contaminant control devices as follows: [OAR 340-226-0120]

- a. Conduct a monthly walk-through inspection to ensure that all used rags containing solvent are in covered containers; and
- b. Conduct a monthly walk-through inspection of the work areas to ensure that all VOC containers are closed when not in use.

7.2. 40 CFR Part 63 Subpart WWWW - Continuous Compliance Demonstration

For the chromate conversion pretreatment tank that is subject to the management practices specified in Condition 5.3, the permittee must demonstrate continuous compliance according to the following requirements: [40 CFR 63.11508(d)(8)]

- a. The permittee must implement the applicable management practices specified in Condition 5.3, during all times that the affected tank or process is in operation; and
- b. The permittee must prepare an annual compliance certification according to the requirements specified in Condition 9.2 and keep it in a readily-accessible location for inspector review.

7.3. PSEL Compliance Monitoring by Mass Balance Without Controls

The permittee must demonstrate compliance with the PSEL in Condition 6.1 and the RACT synthetic minor limit in Condition 4.1 by calculating the VOC emissions for each 12 consecutive calendar month period based on the following formula: [OAR 340-222-0080]

$$E_{\text{VOC-A}} = [\sum(C_x \times K_x) - W] \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

$E_{\text{VOC-A}}$	=	VOC emissions in tons/year
Σ	=	symbol representing “summation of”
C	=	Material usage for the period in gallons
K	=	VOC content in pounds of VOC per gallon of material
x	=	Subscript x represents a specific material
W	=	Weight of VOC shipped offsite in pounds

8.0 RECORDKEEPING REQUIREMENTS

8.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the facility and associated air contaminant control devices: [OAR 340-214-0114]

- a. A summary of visual inspections as required in Condition 7.1;
- b. Monthly/daily records to show compliance with the work practices in Condition 5.2 and the compliance requirements in Condition 7.2;
- c. Monthly purchase records of paint booth filters;
- d. Monthly purchase records of surface coatings, thinners, and cleaning solvents, by type, with VOC content in pounds per gallon, excluding water;
- e. Monthly purchase records of chemicals used in the chromate conversion pretreatment tank;

- a. Safety Data Sheets or product information sheets for coatings and solvents used in preparation, application, clean-up of metal parts, and clean-up of spray guns.
- b. Monthly/daily records of the amount of surface coatings and thinners used, in gallons or pounds, and type;
- c. Monthly/daily records of the amount of cleaning solvents used, in gallons;
- d. Monthly calculations of VOC emissions using the calculation method in Condition 7.3 to demonstrate compliance with Condition 4.1 and the PSEL in Condition 6.1;
- e. Monthly records of natural gas usage;
- f. Training program records; and
- g. Any other monthly records required to determine compliance.

8.2. NESHAP – Subpart HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations Recordkeeping

The permittee must maintain the following records for a minimum of 5 years. Records must be maintained onsite for at least 2 years and may be kept offsite for the remaining 3 years: [40 CFR 63.11175(b), 63.11177, and 63.11178]

- a. Certification that each painter has completed the training specified in Condition 5.2.f, with the date the initial training and the most recent refresher training was completed;
- b. Documentation of the filter efficiency of any spray booth exhaust filter material;
- c. Documentation from the spray gun manufacturer that a spray gun with a cup capacity \geq 3.0 fluid ounces that does not meet the definition of an HVLP spray gun, electrostatic application, airless spray gun, or air assisted airless spray gun, has been determined by the EPA Administrator to achieve a transfer efficiency equivalent to that of an HVLP spray gun;
- d. Copies of any notification submitted (Initial Notification / Compliance Status Notification) and copies of any Annual Notification of Changes Report submitted;
- e. Records of any deviation from the applicable requirements. These records must include the date and time period of the deviation, a description of the nature of the deviation and the actions taken to correct the deviation;
- f. Records of any assessments of source compliance performed in support of the Initial Notification, Compliance Status Notification or Annual Notification of Changes Report.

8.3. 40 CFR Part 63 Subpart WWWW Recordkeeping Requirements

The permittee must keep the records required to show continuous compliance with each management practice specified in Condition 5.2 and the compliance demonstration requirements in Condition 7.2.

8.4. Excess Emissions

- a. The permittee must maintain the records of excess emissions listed below and as defined in OAR 340-214-0300 through 340-214-0340 and 40 CFR 63.10(b)(2), recorded on occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance.
 - 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;
 - ii. The date and time the permittee notified DEQ of the event;
 - iii. The equipment involved;
 - iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - 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;
 - 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); and
 - vii. The final resolution of the cause of the excess emissions;
- b. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).
- 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 Emergency Response System (OERS). The current number is 1-800-452-0311.
- d. The permittee must maintain a log of all excess emissions in accordance with OAR 340-214-0340(3).

8.5. Complaint Log

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution concerns associated to the permitted facility. Documentation must include date of contact, date and time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and date and time of response to complainant. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. [OAR 340-214-0114]

8.6. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to DEQ upon request. The permittee must maintain the two (2) most recent years of records onsite. [OAR 340-214-0114 and 40 CFR 63.11509(f)]

9.0 REPORTING REQUIREMENTS

9.1. RACT Synthetic Minor

The permittee must notify DEQ within 7 days of discovery of any exceedance of the RACT synthetic minor limit in Condition 4.1.

9.2. NESHAP –Subpart HHHHHH – Paint Stripping and Miscellaneous Surface Coating Operations Notifications

The permittee must submit the following notifications as indicated below: [40 CFR 63.11175]

- a. The permittee must prepare and submit an Annual Notification of Changes Report in each calendar year in which information previously submitted in either the Initial Notification, Notification of Compliance Status, or a previous annual notification of changes report submitted under this condition, has changed. Deviations from the relevant requirements in Conditions 5.2.e through 5.2.f on the date of the report will be deemed to be a change; [40 CFR 63.11176]
- b. The Annual Notification of Changes Report must be submitted by February 15 of each calendar year when reportable changes have occurred and must include the following information:
 - i. The company's name, DEQ permit number, and the address of the affected source;
 - ii. The name, title, address, telephone, e-mail address (if available) and signature of the certifying company official, certifying the truth, accuracy, and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of Condition 5.2 or an explanation of any noncompliance and a description of corrective actions being taken to achieve compliance;
 - iii. A description of the change triggering the submittal of the Annual Notification of Changes Report.

9.3. 40 CFR Part 63 WWWWWW-Annual Certification of Compliance Report

The permittee must prepare an annual certification of compliance report that includes the following: [40 CFR 63.11509(c)]

- a. For each tank that is subject to the management practices specified in Condition 5.2, the permittee must state in the annual compliance certification whether the applicable management practices have been implemented, as practicable.
- b. Each annual compliance report must be prepared no later than January 31 of the year immediately following the reporting period and kept in a readily accessible location for inspector review. If a deviation has occurred during the year, each annual compliance report must be submitted along with the deviation report, and postmarked or delivered no later than February 15th of the year immediately following the reporting period.

9.4. 40 CFR Part 63 Subpart WWWW - Deviation Report

If any deviations from the compliance requirements specified in this permit occurred during the year, the permittee must report the deviations, along with the corrective action taken, and submit this report to DEQ in the annual report required by Condition 9.6. [40 CFR 63.11509(d)]

9.5. 40 CFR Part 63 Subpart WWWW Reporting Requirements

If the permittee makes a change to any items below that does not result in a deviation, an amended Notification of Compliance Status should be submitted within 30 days of the change. [40 CFR 63.11509(b)(3)]

- a. List of affected sources and the plating and polishing metal HAP used in, or emitted by, those sources.
- b. Description of the capture and emission control systems used to comply with the applicable equipment standards.
- c. Statement by permittee as to whether the source is in compliance with the applicable standards or other requirements.

9.6. Annual Report

For each year this permit is in effect, the permittee must submit to DEQ by **February 15** two (2) paper copies and one (1) electronic copy of the following information for the previous calendar year:

- a. Operating parameters:
 - i. A summary of visual inspections as required in Condition 7.1;
 - ii. A copy of the Annual Notification of Changes Report as required by Condition 9.2 (if applicable); and
 - iii. A copy of the annual certification of compliance report for 40 CFR Part 63 Subpart WWWW as required by Conditions 9.2 and 9.4;
- b. Calculations of annual pollutant emissions determined each month in accordance with in Condition 7.3;
- c. Summary of complaints relating to air quality received by permittee during the year in accordance with Condition 8.5;

- d. List permanent changes made in facility process, production levels, and pollution control equipment which affected air contaminant emissions;
- e. List major maintenance performed on pollution control equipment; and
- f. Any other monthly records required to determine compliance.

9.7. Excess Emissions

- a. The permittee must notify DEQ of excess emissions events if the excess emission is of a nature that could endanger public health.
- b. The permittee must also submit follow-up reports summarizing records of excess emissions required in Condition 8.4 when required by DEQ. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 11.0 by email, telephone, facsimile, or in person.
- c. If the excess emissions occur during non-business hours, the permittee must notify DEQ by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.

9.8. Greenhouse Gas Registration and Reporting

- a. If the calendar year greenhouse gas emissions (CO₂e) are ever greater than or equal to 2,756 tons (2,500 metric tons), the permittee must annually register and report its greenhouse gas emissions with DEQ in accordance with OAR 340 division 215.
- b. If the calendar year greenhouse gas emissions (CO₂e) are less than 2,756 tons (2,500 metric tons) for three consecutive years, the permittee may stop reporting greenhouse gas emissions but must retain all records used to calculate greenhouse gas emissions for the five years following the last year that they were required to report. The permittee must resume reporting its greenhouse gas emissions if the calendar year greenhouse gas emissions (CO₂e) are greater than or equal to 2,756 tons (2,500 metric tons) in any subsequent calendar year.

9.9. Notice of Change of Ownership or Company Name

The permittee must notify DEQ in writing using a DEQ "Transfer Application Form" within 60 days after the following:

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

9.10. Construction or Modification Notices

The permittee must notify DEQ in writing using a DEQ "Notice of Intent to Construct Form," or other permit application form and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:

- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
- b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. Constructing or modifying any air pollution control equipment.

10.0 ADMINISTRATIVE REQUIREMENTS

10.1. Permit Renewal Application

The permittee must submit the completed application package for renewal of this permit **120 days prior to the expiration date**. Two (2) paper copies and one (1) electronic copy of the application must be submitted to the DEQ Permit Coordinator listed in Condition 11.2. [OAR 340-216-0040]

10.2. Permit Modifications

Application for a modification of this permit must be submitted within 60 days prior to the source modification. When preparing an application, the applicant should also consider submitting the application 120 days prior to allow DEQ adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the DEQ Business Office.

10.3. Annual Compliance Fee

The permittee must pay the annual fees specified in OAR 340-216-8020, Table 2, Part 2 and 3 for a Standard ACDP on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by DEQ regulations will be mailed prior to the above date. **Late fees in accordance with Part 5 of the table will be assessed as appropriate.**

10.4. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in OAR 340-216-8020, Table 2, Part 4 with an application for changing the ownership or the name of the company.

10.5. Special Activity Fees

The permittee must pay the special activity fees specified in OAR 340-216-8020, Table 2, Part 4 with an application to modify the permit.

11.0 DEQ CONTACTS / ADDRESSES

11.1. Business Office

The permittee must submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

Oregon Dept. of Environmental Quality
Financial Services – Revenue Section
700 NE Multnomah St., Suite 600
Portland, Oregon 97232-4100

11.2. Permit Coordinator

The permittee must submit all notices, reports (annual reports, source test plans and reports, etc.), and applications that do not include payment to the Permit Coordinator.

Oregon Dept. of Environmental Quality
Northwest Region
Air Quality Permit Coordinator
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100
nwraqpermits@deq.state.or.us

11.3. Report Submittals

Unless otherwise notified, the permittee must submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Region. If you know the name of the Air Quality staff member responsible for your permit, please include it:

Oregon Dept. of Environmental Quality
Northwest Region Air Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232-4100

11.4. Web Site

Information about air quality permits and DEQ's regulations may be obtained from the DEQ web page at www.oregon.gov/deq/.

12.0 GENERAL CONDITIONS AND DISCLAIMERS

12.1. Permitted Activities

- a. Until this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from the following:
 - i. Processes and activities directly related to or associated with the devices/processes listed in Condition 1.0 of this permit;
 - i. Any categorically insignificant activities, as defined in OAR 340-200-0020, at the source; and
 - ii. Construction or modification changes that are Type 1 or Type 2 changes under OAR 340-210-0225 that are approved by DEQ in accordance with OAR 340-210-0215 through 0250, if the permittee complies with all of the conditions of DEQ's approval to construct and all of the conditions of this permit.
- b. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit.

12.2. Other Regulations

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

12.3. Conflicting Conditions

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. [OAR 340-200-0010]

12.4. Masking of Emissions

The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400]

12.5. DEQ Access

The permittee must allow DEQ's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.

12.6. Permit Availability

The permittee must have a copy of the permit available at the facility at all times. [OAR 340-216-0020(3)]

12.7. Open Burning

The permittee may not conduct any open burning except as allowed by OAR 340, division 264.

12.8. Asbestos

The permittee must comply with the asbestos abatement requirements in OAR 340, division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance.

12.9. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

12.10. Permit Expiration

- a. A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit: [OAR 340-216-0082]
 - i. A timely and complete application for renewal of this permit or for a different ACDP has been submitted; or
 - ii. A timely and complete application for renewal or for an Oregon Title V Operating Permit has been submitted, or
 - iii. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.
- b. For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially.

12.11. Permit Termination, Revocation, or Modification

DEQ may terminate, revoke, or modify this permit pursuant to OAR chapter 340 division 216. [OAR 340-216-0082].

13.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	O ₂	oxygen
ASTM	American Society for Testing and Materials	OAR	Oregon Administrative Rules
AQMA	Air Quality Maintenance Area	ORS	Oregon Revised Statutes
calendar year	The 12-month period beginning January 1st and ending December 31 st	O&M	operation and maintenance
CAO	Cleaner Air Oregon	Pb	lead
CFR	Code of Federal Regulations	PCD	pollution control device
CO	carbon monoxide	PEMS	Predictive emission monitoring system
CO _{2e}	carbon dioxide equivalent	PM	Particulate matter
DEQ	Oregon Department of Environmental Quality	PM ₁₀	particulate matter less than 10 microns in size
dscf	dry standard cubic foot	PM _{2.5}	particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppm	part per million
FCAA	Federal Clean Air Act	PSD	Prevention of Significant Deterioration
Gal	gallon(s)	PSEL	Plant Site Emission Limit
GHG	greenhouse gas	PTE	Potential to Emit
gr/dscf	grains per dry standard cubic foot	RACT	Reasonably Available Control Technology
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	scf	standard cubic foot
I&M	inspection and maintenance	SER	Significant Emission Rate
lb	pound(s)	SIC	Standard Industrial Code
MMBtu	million British thermal units	SIP	State Implementation Plan
NA	not applicable	SO ₂	sulfur dioxide
NESHAP	National Emissions Standards for Hazardous Air Pollutants	Special Control Area	as defined in OAR 340-204-0070
NO _x	nitrogen oxides	TACT	Typically Achievable Control Technology
NSPS	New Source Performance Standard	VE	visible emissions
NSR	New Source Review	VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

Table 1 to Subpart WWWW of Part 63—Applicability of General Provisions to Plating and Polishing Area Sources

As required in §63.11510, “What General Provisions apply to this subpart?” you must meet each requirement in the following table that applies to you.

Citation	Subject
63.1 ¹	Applicability.
63.2	Definitions.
63.3	Units and abbreviations.
63.4	Prohibited activities.
63.6(a), (b)(1)-(b)(5), (c)(1), (c)(2), (c)(5), and (j)	Compliance with standards and maintenance requirements.
63.10(a), (b)(1), (b)(2)(i)-(iii), (xiv), (b)(3), (d)(1), (f)	Recordkeeping and reporting.
63.12	State authority and delegations.
63.13	Addresses of State air pollution control agencies and EPA regional offices.
63.14	Incorporation by reference.
63.15	Availability of information and confidentiality.

Table 2 to Subpart HHHHHH of Part 63—Applicability of General Provisions to Subpart HHHHHH of Part 63 [40 CFR 63.11174]

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(a)(1)-(12)	General Applicability	Yes	
§63.1(b)(1)-(3)	Initial Applicability Determination	Yes	Applicability of subpart HHHHHH is also specified in §63.11170.
§63.1(c)(1)	Applicability After Standard Established	Yes	
§63.1(c)(2)	Applicability of Permit Program for Area Sources	Yes	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.1(c)(5)	Notifications	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.1(e)	Applicability of Permit Program to Major Sources Before Relevant Standard is Set	No	(63.11174(b) of Subpart HHHHHH exempts area sources from the obligation to obtain Title V operating permits.
§63.2	Definitions	Yes	Additional definitions are specified in §63.11180.
§63.3(a)-(c)	Units and Abbreviations	Yes	
§63.4(a)(1)-(5)	Prohibited Activities	Yes	
§63.4(b)-(c)	Circumvention/Fragmentation	Yes	
§63.5	Construction/Reconstruction of major sources	No	Subpart HHHHHH applies only to area sources.
§63.6(a)	Compliance With Standards and Maintenance Requirements— Applicability	Yes	
§63.6(b)(1)-(7)	Compliance Dates for New and Reconstructed Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(c)(1)-(5)	Compliance Dates for Existing Sources	Yes	§63.11172 specifies the compliance dates.
§63.6(e)(1)-(2)	Operation and Maintenance	Yes	
§63.6(e)(3)	Startup, Shutdown, and Malfunction Plan	No	No startup, shutdown, and malfunction plan is required by subpart HHHHHH.
§63.6(f)(1)	Compliance Except During Startup, Shutdown, and Malfunction	Yes	
§63.6(f)(2)-(3)	Methods for Determining Compliance	Yes	
§63.6(g)(1)-(3)	Use of an Alternative Standard	Yes	
§63.6(h)	Compliance With Opacity/Visible Emission Standards	No	Subpart HHHHHH does not establish opacity or visible emission standards.
§63.6(i)(1)-(16)	Extension of Compliance	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.6(j)	Presidential Compliance Exemption	Yes	
§63.7	Performance Testing Requirements	No	No performance testing is required by subpart HHHHHH.
§63.8	Monitoring Requirements	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(a)-(d)	Notification Requirements	Yes	§63.11175 specifies notification requirements.
§63.9(e)	Notification of Performance Test	No	Subpart HHHHHH does not require performance tests.
§63.9(f)	Notification of Visible Emissions/Opacity Test	No	Subpart HHHHHH does not have opacity or visible emission standards.
§63.9(g)	Additional Notifications When Using CMS	No	Subpart HHHHHH does not require the use of continuous monitoring systems.
§63.9(h)	Notification of Compliance Status	No	§63.11175 specifies the dates and required content for submitting the notification of compliance status.
§63.9(i)	Adjustment of Submittal Deadlines	Yes	
§63.9(j)	Change in Previous Information	Yes	§63.11176(a) specifies the dates for submitting the notification of changes report.
§63.10(a)	Recordkeeping/Reporting— Applicability and General Information	Yes	
§63.10(b)(1)	General Recordkeeping Requirements	Yes	Additional requirements are specified in §63.11177.
§63.10(b)(2)(i)-(xi)	Recordkeeping Relevant to Startup, Shutdown, and Malfunction Periods and CMS	No	Subpart HHHHHH does not require startup, shutdown, and malfunction plans, or CMS.
§63.10(b)(2)(xii)	Waiver of recordkeeping requirements	Yes	

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.10(b)(2)(xiii)	Alternatives to the relative accuracy test	No	Subpart HHHHHH does not require the use of CEMS.
§63.10(b)(2)(xiv)	Records supporting notifications	Yes	
§63.10(b)(3)	Recordkeeping Requirements for Applicability Determinations	Yes	
§63.10(c)	Additional Recordkeeping Requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(d)(1)	General Reporting Requirements	Yes	Additional requirements are specified in §63.11176.
§63.10(d)(2)-(3)	Report of Performance Test Results, and Opacity or Visible Emissions Observations	No	Subpart HHHHHH does not require performance tests, or opacity or visible emissions observations.
§63.10(d)(4)	Progress Reports for Sources With Compliance Extensions	Yes	
§63.10(d)(5)	Startup, Shutdown, and Malfunction Reports	No	Subpart HHHHHH does not require startup, shutdown, and malfunction reports.
§63.10(e)	Additional Reporting requirements for Sources with CMS	No	Subpart HHHHHH does not require the use of CMS.
§63.10(f)	Recordkeeping/Reporting Waiver	Yes	
§63.11	Control Device Requirements/Flares	No	Subpart HHHHHH does not require the use of flares.
§63.12	State Authority and Delegations	Yes	
§63.13	Addresses of State Air Pollution Control Agencies and EPA Regional Offices	Yes	
§63.14	Incorporation by Reference	Yes	Test methods for measuring paint booth filter efficiency and spray gun transfer efficiency in §63.11173(e)(2) and (3) are incorporated and included in §63.14.

Citation	Subject	Applicable to subpart HHHHHH	Explanation
§63.15	Availability of Information/Confidentiality	Yes	
§63.16(a)	Performance Track Provisions— reduced reporting	Yes	
§63.16(b)-(c)	Performance Track Provisions— reduced reporting	No	Subpart HHHHHH does not establish numerical emission limits.



State of Oregon
Department of
Environmental
Quality

SIMPLE AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

RUSCO, Inc.
abn Dura Industries
4466 NW Yeon Avenue
Portland, OR 97210

Source Information:

SIC	3471/3479
NAICS	332812
EPA ICIS-Air ID	OR0000004105103112

Source Categories (Table 1 Part, code)	Part B, 65
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

FCE	NA
Compliance schedule	NA
Unassigned emissions	NA
Emission credits	NA
Special Conditions	X

Source test	NA
COMS	NA
CEMS	NA
PEMS	NA
Ambient monitoring	NA

Reporting Requirements

Annual report (due date)	February 15
Quarterly report (due dates)	NA

Monthly report (due dates)	NA
Excess emissions report	NA
Other (specify)	NA

Air Programs

Synthetic Minor (SM)	X
SM -80	NA
NSPS (list subparts)	NA
NESHAP (list subparts)	Part 63, HHHHHH, WWWWWW
CAO	NA

NSR	NA
PSD	NA
GHG	NA
RACT	NA
TACT	NA
Other (specify)	NA

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PERMITTING

PERMITTEE IDENTIFICATION

1. RUSCO, Inc. dba Dura Industries
4466 NW Yeon Avenue
Portland, Oregon 97210

PERMITTING ACTION

2. The proposed permit is a renewal of an existing Simple Air Contaminant Discharge Permit (ACDP) that was issued on 09/04/14 to RUSCO, Inc. dba Dura Industries (RUSCO) and was originally scheduled to expire on 08/01/19. The permittee is on a Simple ACDP because the facility:
 - Has less than four (4) different kinds of devices/processes;
 - Has no control devices that need operation and maintenance conditions; and
 - Has had little past public interest.

Most synthetic minor sources are permitted through a Standard ACDP. RUSCO is not required to be on a Standard ACDP because it is not a complicated source and compliance with permit conditions is straightforward.

3. The existing ACDP remains in effect until final action is taken on the renewal application because the permittee submitted a complete application for renewal.
4. RUSCO has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because construction had commenced on this facility prior to November 16, 2018. As an existing source the permittee is required to perform a risk assessment in accordance with OAR 340-245-0050, and demonstrate compliance with the Risk Action Levels for an "Existing Source" in OAR 340-245-8010 Table 1 when called in by DEQ. RUSCO has not been called in and therefore, has not performed a risk assessment but is required to report toxic air contaminant emissions triennially.

OTHER PERMITS

5. Other permits issued or required by the DEQ is registration as a small quantity hazardous waste generator (EPA ID: ORD083647347). RUSCO is authorized to discharge industrial wastewater to the city's sewer system in compliance with the rules of RUSCO's permit number 433.038.
6. A Land Use Compatibility Statement was signed by the City of Portland on 11/14/1998 granted unconditional approval.

ATTAINMENT STATUS

7. RUSCO is located in a maintenance area for CO and ozone. NO_x, and VOC are precursors to ozone. The facility is not a significant source of CO, NO_x and VOC. The area is in attainment for all other criteria pollutants.
8. RUSCO is not located within 10 kilometers of any Class I area.

SOURCE DESCRIPTION

9. Dura Industries is a metal finishing business providing powder coating and liquid painting of aluminum parts, including a 7-stage pretreatment process. The pretreatment process includes an alkaline cleaner, an acid deoxidizer, and chromate conversions on aluminum. Dura Industries is an approved applicator of high-performance thermally cured organic architectural coatings (PVDF) and certified applicator for PACCAR truck parts. Services include Kynar 500™ coatings (Duranar, Fluropon) for extrusions, curtain wall panels, storefront, entrance systems and architectural components. This also includes baked enamels powder coatings and other durable finishes that meet industry specifications for truck parts and a variety of manufactured goods as well as electronic components and military parts. A conveyor system with the ability to do either paint or powder coatings gives them the versatility to meet the needs of many types of customers.

Pretreatment

Paint and powder coating systems are designed to be applied over clean metal that has been properly pretreated. All materials that come into the shop are counted and inspected before they go into the pretreatment system. Aluminum goes through a 7 stage chromate conversion process meeting the rigid requirements necessary to meet coating specifications for industry standards for aluminum coatings for architecture. The process begins with loading the aluminum into a stainless steel basket and then hoisting it into the pretreatment tanks in this order:

- a. Inproclean 2500 tank filled with Gardobond Additive H for 5-10 minutes at 140° with a concentration of 5% ammonium hydroxide;
- b. The basket is then moved into the next tank which is a fresh water rinse tank;
- c. After the rinse tank, it is moved into the deoxidizer tank filled with Deoxidizer® SS for 5 minutes. This tank has an ambient temperature and a concentration of 25% nitric acid and 5% hydrofluoric acid;
- d. After the deoxidizer tank, it is moved into another fresh water rinse tank;
- e. After the rinse tank it is moved into the L25 chromate conversion pretreatment tank filled with 7204 filled with CHEMEON TCP-HF for 5 minutes at 110° with a concentration of 30% trivalent chromium;

- f. After the chromate tank the basket is moved into the a fresh water rinse; and
- g. Finally a second stage or final fresh water rinse.

The basket is then lowered onto a rolling dolly and moved into a natural gas fired oven at 140° where the parts are dried before handling. When the parts are dry, they are racked onto hangers and carts then moved into the paint area for processing.

The pretreatment tanks are checked daily and maintained regularly to assure that the solutions and temperatures are at optimum conditions. In 2006, Dura Industries installed equipment to evaporate wastewater that, for many years, was being discharged into the local sewage system. All waste water is evaporated and the volume of water usage has dropped to less than one quarter of previous usage. Hazardous waste that is hauled to designated landfills has also dropped by more than 60%.

In 2020, RUSCO converted chemical used in the chromate conversion pretreatment tank from one using hexavalent chromium, which is highly toxic, to one using trivalent chromium, which is not toxic. This conversion will also further reduce the hazardous waste from the pretreatment process.

Coating

The facility uses both liquid and powder coating applied using electrostatic, high-volume, low-pressure (HVLP) and conventional hand spray guns. In the paint process, Dura Industries is given small metal color samples from customers to match. This becomes the color standard for each individual job. After the color match is achieved, the paint is reduced with xylene to a viscosity that makes it sprayable out of a paint gun.. The paint is then filtered into the 2 or 5 gallon paint pot. Dura Industries applies a polyvinylidene difluoride (PVDF) primer and then the color coat to the customer's metal. The solvents flash off for 5 minutes, then the parts are baked at 450° for 10-20 minutes. After the parts are baked and cooled, the metal can be packaged and shipped back to the customer.

Powder Coating

Powder coating is a type of dry coating, which is applied as a free-flowing, dry powder. The main difference between a conventional liquid paint and a powder coating is that the powder coating does not require a solvent to keep the binder and filler parts in a liquid suspension form. The coating is typically applied electrostatically and is then cured under heat to allow it to flow and form a "skin." It is usually used to create a hard finish that is tougher than conventional paint. Powder coated surfaces are more resistant to chipping, scratching and wearing than other finishes. Powder coating is mainly used for coating of metals, such as "white goods", architectural aluminum extrusions, automobile, truck and motorcycle parts. A conveyerized system handles large volume jobs and a batch booth is used for the day to day small jobs.

- 10. The facility began operations 11/21/1983.
- 11. The facility operates approximately 14 hours per day, 5 days per week and 52 weeks per year for approximately 3,900 to 4,100 hours/year.

12. Estimated annual fuel consumption consists of 21,000 therms (approximately 19 million cubic feet) of natural gas.
13. The following changes have been made to the facility since the last permit renewal:
- a. In 2020, RUSCO converted the chemical used in the chromate conversion pretreatment tank from one using hexavalent chromium to one using trivalent chromium, thus eliminating hexavalent chromium emissions. This conversion will reduce risk from toxic air contaminants and was done in anticipation of Cleaner Air Oregon.
 - b. In 2005, RUSCO installed a wastewater evaporator for the pretreatment tanks. RUSCO has submitted a Notice of Intent to Construct as a result of the 2020 compliance inspection. Investigation of the wastewater evaporator prompted an inquiry into regulatory requirements concerning evaporators. The investigation revealed that while there are no air quality regulations concerning evaporators, the use of evaporators to treat wastewater is subject to RCRA regulations, and DEQ's hazardous waste division was notified and consulted to determine whether RUSCO's usage constituted improper use according to hazardous waste regulations. Representatives of DEQ's hazardous waste division considered the question and indicated that wastewater can be treated, but that process solutions do not meet the definition of wastewater, citing EPA guidance memos RO11020 and RO14472, both of which concern the definition of wastewater. These memos state that wastewater is "substantially water with contaminants amounting to a few percent at most". Rusco has been using its evaporator to evaporate rinse water and process solution. Based on the EPA definition, only the rinse water qualifies as wastewater, and therefore they may only use the evaporator to evaporate their rinse water, and not their process solution. RUSCO indicated that they evaporate the contents of their alkaline and acid tanks on an annual basis, and that they evaporate the contents of their chromate coating tank on an as-needed basis, estimated to be slightly less frequently than once per year according to the owner. They affirmed that they did evaporate the contents of their final batch of hexavalent chromium-containing chromate coating tank after switching to a trivalent chromium coating solution in February 2020. The hazardous waste division has been informed of this practice and determined that it is in violation of their regulations, and may result in future enforcement action.
14. Existing air contaminant sources at the facility consist of the following:

Device/Process Description	Construction / Installation Date	Pollution Control Device Description	Construction / Installation Date	Control Efficiency
(4) Spray painting booths	Early 1990s	Paint booth filters	Early 1990s	90% ¹

¹ 90% removal efficiency pertains to particulate matter.

Device/Process Description	Construction / Installation Date	Pollution Control Device Description	Construction / Installation Date	Control Efficiency
with (3) natural gas-fired drying ovens				
(1) Powder booth with (1) natural gas-fired drying ovens	Early 1990s	NA	NA	NA
Categorically Insignificant Activities				
Solvent recycler		NA	NA	NA
Chromate conversion pretreatment tank	Late 1980s	NA	NA	NA
Wastewater evaporator	2005	NA	NA	NA

- a. Four (4) spray booths and three (3) natural gas heated ovens. Both the powder and solvent based coating are sprayed in these booths;
- b. One (1) continuous conveyor system consists of a powder coating booth with the powder recycle system, drying oven and the conveyor line. The conveyor system also accommodates a liquid spray paint booth;
- c. Six (6) dip tanks for cleaning and one (1) chromate conversion pretreatment tank of aluminum extrusion parts in preparation for the architectural coating standards;
- d. Wastewater evaporator; and
- e. Solvent recycler.

The paint booths are each equipped with a manometer that reads the velocity of air before the filter and static pressure behind the filter and is monitored daily. The filter change-out schedule is based on the manometer readings and occurs approximately every two weeks. Filters are kept onsite to maintain the paint booth schedule.

Electrostatic guns are used 90% of the time while and conventional guns are used 10% of the time. The paint guns are cleaned by spraying the excess paint from the gun into a bucket, and then the solids are collected and recycled. The facility maintenance plan includes cleaning of the baking ovens annually to operate more efficiently for heating temperatures.

COMPLIANCE HISTORY

15. DEQ inspected the facility on 02/04/20 and found them to be in compliance with all conditions.
16. During the prior permit period there were no complaints recorded for this facility.
17. No enforcement actions have been taken against this source since the last permit renewal was issued on 09/04/14.

EMISSIONS

18. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limits (PSEL)		
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase (tons/yr)
VOC	0	0	0	39	39	0

- a. The baseline emission rate and netting basis is zero because RUSCO was not in operation during the baseline period of 1977/1978 in accordance with OAR 340-222-0048(1) and OAR 340-222-0040(2).
- b. For Simple ACDPs, the proposed PSEL for VOC is equal to the Generic PSEL in accordance with OAR 340-216-0064(3)(b).
- c. PM and gaseous emissions from natural gas combustion in the bake ovens are all less than one ton per year for each pollutant. The combustion of 200,000 therms/year or 19 MMCF/year results in approximately 1,150 tons/year of greenhouse gas emissions. Since all of these emissions are less than de minimis levels in OAR 340-200-0020(39), they are not included in the PSELs in the permit.

Natural Gas Combustion Emissions						
Combustor Type	PM ² /PM10/PM _{2.5}	SO ₂ ³	NO _x	CO	VOC	GHG
Drying Ovens emission factor (lb/MM cubic feet)	2.5	1.7	100	84	5.5	121,189
Emissions (tons/year)	0.02	0.02	0.95	0.8	0.05	1144

¹ All emission factors are from DEQ and AP-42, Tables 1.4-1 and 1.4-2, except the PM/PM₁₀/PM_{2.5} and SO₂ factors.

² The PM/PM₁₀/PM_{2.5} emissions factor is a DEQ factor based on local testing.

³ The SO₂ emissions factor is a DEQ factor based on local sulfur content of natural gas (long term average = 6,000 grains/million cubic feet x 1 pound/7,000 grains x 2 pounds SO₂/pound of S = 1.7 lb/million cubic of natural gas

- d. Actual VOC emissions reported for past years are included in the table below:

year	tons/year
2014	8.8
2015	7.0
2016	6.4
2017	5.9
2018	5.2

- e. The PSEL is a federally enforceable limit on the potential to emit.
- f. RUSCO previously used a mixture containing hexavalent chromium (Oakite Chromicoat T3) in the chromate conversion pretreatment tank and now uses a mixture that contains trivalent chromium (CHEMEON TCP-HF), thus eliminating hexavalent chromium emissions. This process change was made in anticipation of permitting toxic air contaminants under Cleaner Air Oregon.

SIGNIFICANT EMISSION RATE ANALYSIS

19. For each pollutant, the proposed Plant Site Emission Limit is less than the sum of the Netting Basis and the significant emission rate, thus no further air quality analysis is required at this time.

TITLE V MAJOR SOURCE APPLICABILITY

20. A major source is a facility that has the potential to emit 100 tons/year or more of any criteria pollutant or 10 tons/year or more of any single HAP or 25 tons/year or more of combined HAPs.
21. A source that has potential to emit at the major source levels but accepts a PSEL below major source levels is called a synthetic minor (SM).
22. A source that has the potential to emit above the Title V major source thresholds but is willing to take a limit that is 80% or greater of the major source thresholds (e.g., 80 tons per year or greater for criteria pollutants) is called a synthetic minor 80 (SM-80).
23. A source that has the potential to emit less than major source thresholds is called a true minor.

24. A source that has the potential to emit less than major source thresholds but is required by rule to obtain a Title V permit is called a Title V minor source.
25. 40 CFR 63.11505(e) exempts the permittee from the obligation to obtain title V operating permits.

CRITERIA POLLUTANTS

26. This source has the potential to emit VOCs at major source levels but has accepted a federally enforceable operational limit of 39 tons/year. Therefore, this source is a synthetic minor of criteria pollutants. The basis for this determination can be found above in Paragraph 18 of this Review Report.

HAZARDOUS AIR POLLUTANTS

27. This source is not a major source of hazardous air pollutants. The basis for this determination can be found in the table below.

Component	CAS Number	LB HAP
2-Methoxypropyl-1-acetate	70657-70-4	0.003
Benzene	71-43-2	0.1
C.I. Pigment Blue 28	1345-16-0	24.9
C.I. Pigment Blue 36	68187-11-1	76.7
C.I. Pigment Brown 24	68186-90-3	37.7
C.I. Pigment Green 50	68186-85-6	9.3
C.I. Pigment Yellow 53	8007-18-9	1.4
Chromium hydroxide (Cr(OH) ₃)	1308-14-1	0.4
Chromium iron oxide	12737-27-8	0.002
Chromium oxide (Cr ₂ O ₃)	1308-38-9	18.2
Cumene	98-82-8	17.4
Diethylene glycol monobutyl ether	112-34-5	1650
Diethylene glycol monobutyl ether acetate	124-17-4	5.4
Dimethyl phthalate	131-11-3	1944
Ethyl acrylate	140-88-5	0.03
Ethylbenzene	100-41-4	295
Ethylene glycol monobutyl ether acetate	112-07-2	373
Formaldehyde	50-00-0	0.6
Hematite, chromium green black	68909-79-5	2.6
Isophorone	78-59-1	0.5
Methyl alcohol	67-56-1	7.3
Methyl methacrylate	80-62-6	0.0
Naphthalene	91-20-3	2.5

Sodium chromate		0.1
Solvent naphtha, petroleum, medium aliphatic	64742-88-7	0.0
Spinels, chromium copper black	68186-91-4	432
Strontium chromate		51
Toluene	108-88-3	2992
Xylenes	1330-20-7	1505
	TOTALS (lb/yr)	9447
Totals are based on 4,100 hours operation/year	TOTALS (tons/yr)	4.7
PTE based on 8,760 hours operation/year	PTE (tons/year)	10.1

TOXICS RELEASE INVENTORY

28. The Toxics Release Inventory (TRI) is federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which DEQ has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, [chemicals covered by the TRI Program](#) are those that cause:
- Cancer or other chronic human health effects;
 - Significant adverse acute human health effects; or
 - Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical.

29. RUSCO is not covered by the TRI program because it does not manufacture, process or use TRI-listed chemicals in quantities above threshold levels in a given year:
- Manufactured (including imported) more than 25,000 pounds of the chemical in the reporting year, or
 - Processed more than 25,000 pounds of the chemical in the reporting year, or
 - Otherwise used more than 10,000 pounds of the chemical in the reporting year.

RUSCO uses two chemicals on the Section 313 chemical list (xylene and toluene) but does not use more than 10,000 pounds of either of these chemicals.

CLEANER AIR OREGON

30. RUSCO has not been called in and therefore, has not performed a risk assessment.

ADDITIONAL REQUIREMENTS

NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

31. 40 CFR Part 60, Subpart Dc - "Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units" is not applicable to the source because it operates four natural gas fired ovens that are not steam generating units and do not meet the applicability criteria of this federal regulation.
32. 40 CFR Part 60, Subpart IIII - "Standards of Performance for Stationary Compression Ignition Internal Combustion Engines" is not applicable to the source because it does not have any stationary internal combustion engines.
33. 40 CFR Part 60, Subpart JJJJ - "Standards of Performance for Stationary Spark Ignition Internal Combustion Engines" is not applicable to the source because it does not have any stationary internal combustion engines.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS APPLICABILITY

34. 40 CFR Part 63, Subpart HHHHHH - National Emission Standards for Paint Stripping and Miscellaneous Surface Coating Operations at Area Sources" is applicable to the facility because it performs associated activities subject to this federal regulation: Spray application of coatings that contain the target HAP, as defined in §63.11180, to a plastic and/or metal substrate on a part or product, except spray coating applications that meet the definition of facility maintenance or space vehicle in §63.11180.
35. 40 CFR Part 63, Subpart WWWWWW National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations is applicable to the source because the facility is a plating and polishing facility that is an area source of hazardous air pollutant (HAP) emissions and has emissions of chromium from the conversion coating process. The facility does electroless plating, also called non-electrolytic plating using chromate conversion coating. Therefore, the management practice requirements of 40 CFR 63.11507(g) apply. [40 CFR 63.11504(a)(3)]

RUSCO was required to be in compliance with 40 CFR Part 63, Subpart WWWWWW no later than July 1, 2010 because it is an existing affected source.
36. 40 CFR Part 61 is not applicable to the source because RUSCO is not a stationary source for which a standard is prescribed under Part 61.

37. 40 CFR Part 63, Subpart N - "National Emission Standards for Chromium Emissions from Hard Chromium Electroplating" is not applicable to the facility because it does not operate a hard chrome electroplating operation.
38. 40 CFR Part 63, Subpart T - "National Emission Standards for Halogenated Solvent Cleaning" is not applicable to the source because it does not do any degreasing of parts before coating but uses the pretreatment process instead.
39. 40 CFR Part 63, Subpart ZZZZ - "National Emission Standards for Reciprocating Internal Combustion Engines" is not applicable to the source because it does not have any stationary internal combustion engines.
40. 40 CFR Part 63, Subpart XXXXXX - National Emission Standards for Hazardous Air Pollutants Area Source Standards for Nine Metal Fabrication and Finishing Source Categories is not applicable to the source as because the source is not included under any of the nine source categories subject to the rule. In addition, this source does not perform any dry abrasive blasting operations which use materials that contain cadmium, chromium, lead, or nickel or have the potential to emit cadmium, chromium, lead, or nickel.

GREENHOUSE GAS REPORTING APPLICABILITY

41. The source is not subject to greenhouse gas reporting under division 215 because actual greenhouse gas emissions are less than 2,500 metric tons (2,756 short tons) of CO₂ equivalents per year. GHG emissions from the combustion of 200,000 therms/year or 19 MMCF/year results in in approximately 1,150 tons/year of greenhouse gas emissions.
42. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

REASONABLY AVAILABLE CONTROL TECHNOLOGY APPLICABILITY

43. The facility is located in the Portland AQMA where RACT requirements for surface coating in manufacturing apply. RUSCO is not subject to the Emission Standards for VOC Point Sources in OAR 340 division 232 because it has taken a synthetic minor limit of 9 tons/year limit on its potential to emit VOCs from the spray painting booths. OAR 340-232-0160(2)(b)(A) states:

“(b) This rule does not apply to:

(A) Sources whose VOC potential to emit before add on controls from activities identified in section (5) are less than 10 tons per year (or 3 pounds VOC/hour or 15 pounds actual VOC/day);”

Even though RUSCO had the VOC potential to emit over 3 pounds/hour and actual VOC emissions are over 15 pounds/day, because RUSCO has taken a 9 tons/year limit on its potential to emit, OAR 340 division 232 is not applicable.

The permit issued on 03/02/94 contained a source-specific State Implementation Plan alternative RACT determination to exempt RUSCO from meeting the high performance architectural coatings standard in then numbered rule OAR 340-22-0170(5)(j)(E) [now numbered OAR 340-232-0160(5)(j)(E)]. The exception to the High Performance Architectural Coatings RACT standard of 3.5 pounds/gallon of coatings, less water, was proposed because high performance architectural coatings were not available at that time, and the cost of control was considered to be excessive for this source. The source-specific State Implementation Plan alternative RACT determination was approved by EPA on 03/31/98 in the Federal Register 63 FR 15293. Because RUSCO has taken a 9 tons/year limit on their VOC emissions, the source-specific State Implementation Plan alternative RACT limit is no longer applicable. DEQ will do a rulemaking in the future in order to remove the RUSCO source-specific State Implementation Plan alternative RACT limit from the Oregon SIP.

TYPICALLY ACHIEVABLE CONTROL TECHNOLOGY APPLICABILITY

44. The source is likely meeting OAR 340-226-0130 Highest and Best Practicable Treatment and Control: Typically Achievable Control Technology (TACT) by:
- a. Taking an enforceable limit of 9 tons/year of VOC emissions to avoid RACT requirements;
 - b. Complying with 40 CFR Part 63, Subpart WWWW - "National Emission Standards for Hazardous Air Pollutants: Area Source Standards for Plating and Polishing Operations; and
 - c. Operation and maintenance of paint booth filters.

PUBLIC NOTICE

45. Pursuant to OAR 340-216-0064(4)(a), issuance of Simple Air Contaminant Discharge Permits require public notice in accordance with OAR 340-209-0030(3)(b), which requires DEQ to provide notice of the proposed permit action and a minimum of 30 days for interested persons to submit written comments. **The public notice was emailed/mailed on September 30, 2020 and the comment period will end on October 30, 2020 at 5 p.m.**

jj:or:dpk

External Combustion (Boiler, Oven, Dryer, Heater, Afterburner) EF in [lb/MMSCF]

200000 therms/year natural gas

19.05 mm cubic feet/year natural gas

	POLLUTANT ¹	CAS or DEQ ID	<10 MMBTU/hr	Emissions lbs/year	Emissions tons/year
	PM ² /PM ₁₀ /PM _{2.5}		2.5	48	0.02
	SO ₂ ³		1.7	32	0.02
	NO _x		100	1905	0.95
	CO		84	1600	0.80
	VOC		5.5	105	0.05
	GHG ⁴		120143	2288431	1144
HAP	Benzene	71-43-2	0.008	0.15	
HAP	Formaldehyde	50-00-0	0.017	0.32	
HAP	PAHs (excluding Naphthalene)*	401	0.0001	0.002	
HAP	Benzo[a]pyrene*	50-32-8	0.0000012	0.00002	
HAP	Naphthalene	91-20-3	0.0003	0.006	
HAP	Acetaldehyde	75-07-0	0.0043	0.08	
HAP	Acrolein	107-02-8	0.0027	0.05	
DEQ AT	Ammonia	7664-41-7	3.2	61	
HAP	Arsenic and compounds	7440-38-2	0.0002	0.004	
DEQ AT	Barium and compounds	7440-39-3	0.0044	0.08	
HAP	Beryllium and compounds	7440-41-7	0.000012	0.0002	
HAP	Cadmium and compounds	7440-43-9	0.0011	0.02	
HAP	Chromium VI	18540-29-9	0.0014	0.03	
HAP	Cobalt and compounds	7440-48-4	0.000084	0.002	
DEQ AT	Copper and compounds	7440-50-8	0.00085	0.02	
HAP	Ethylbenzene	100-41-4	0.0095	0.18	
HAP	Hexane	110-54-3	0.0063	0.12	
Criteria	Lead and compounds	7439-92-1	0.0005	0.01	
HAP	Manganese and compounds	7439-96-5	0.00038	0.007	
HAP	Mercury and compounds	7439-97-6	0.00026	0.005	
DEQ AT	Molybdenum trioxide	1313-27-5	0.00165	0.031	
HAP	Nickel and compounds	7440-02-0	0.0021	0.040	
HAP	Selenium and compounds	7782-49-2	0.000024	0.0005	
HAP	Toluene	108-88-3	0.0366	0.70	
DEQ AT	Vanadium (fume or dust)	7440-62-2	0.0023	0.044	
HAP	Xylene (mixture), including m-xylene, o-xylene, p-xylene	1330-20-7	0.0272	0.52	
DEQ AT	Zinc and compounds	7440-66-6	0.029	0.55	

¹ All criteria pollutant emission factors are from AP-42, Tables 1.4-1 and 1.4-2, except the PM/PM₁₀/PM_{2.5} and SO₂ factors.

² The PM/PM₁₀/PM_{2.5} emissions factor is a DEQ factor based on local testing.

³ The SO₂ emissions factor is a DEQ factor based on local sulfur content of natural gas (long term average = 6,000 grains/million cubic feet). Long term emissions factor = 6,000 grains S/million cubic feet x 1 pound/7,000 grains x 2 pounds SO₂/pound of S = 1.7 lb/million cubic of natural gas

⁴ GHG emission factor from DEQ's Fuel Combustion GHG Calculator

*PAHs (except naphthlene): this value from SCAQMD AB2588 reporting is used for calculating cancer risk; benzo[a]pyrene AP-42 value is used for calculating noncancer risk

Component	CAS Number	LB HAP
2-Methoxypropyl-1-acetate	70657-70-4	0.0
Benzene	71-43-2	0.1
C.I. Pigment Blue 28	1345-16-0	24.9
C.I. Pigment Blue 36	68187-11-1	76.7
C.I. Pigment Brown 24	68186-90-3	37.7
C.I. Pigment Green 50	68186-85-6	9.3
C.I. Pigment Yellow 53	8007-18-9	1.4
Chromium hydroxide (Cr(OH)3)	1308-14-1	0.4
Chromium iron oxide	12737-27-8	0.0
Chromium oxide (Cr2O3)	1308-38-9	18.2
Cumene	98-82-8	17.4
Diethylene glycol monobutyl ether	112-34-5	1650.2
Diethylene glycol monobutyl ether acetate	124-17-4	5.4
Dimethyl phthalate	131-11-3	1944.1
Ethyl acrylate	140-88-5	0.0
Ethylbenzene	100-41-4	294.5
Ethylene glycol monobutyl ether acetate	112-07-2	373.2
Formaldehyde	50-00-0	0.6
Hematite, chromium green black	68909-79-5	2.6
Isophorone	78-59-1	0.5
Methyl alcohol	67-56-1	7.3
Methyl methacrylate	80-62-6	0.0
Naphthalene	91-20-3	2.5
Sodium chromate		0.1
Solvent naphtha, petroleum, medium aliphatic	64742-88-7	0.0
Spinels, chromium copper black	68186-91-4	431.5
Strontium chromate		51.1
Toluene	108-88-3	2992.4
Xylenes	1330-20-7	1504.5
	TOTALS (lb/yr)	9447
Totals are based on 4,100 hours operation/year	TOTALS (tons/yr)	4.7
PTE based on 8,760 hours operation/year	PTE (tons/year)	10.1