

Public Notice

DEQ Requests Comments on Dynic USA's Proposed Air Quality Permit

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

Summary

DEQ received an application for the renewal of Dynic's existing Simple ACDP on Feb. 3, 2012. The facility replaced its thermal oxidizer in 2017. There were no changes to the facility since the last permit action that caused an increase in any regulated pollutant emissions. Actual emissions of nitrogen dioxide and carbon monoxide decreased due to less natural gas combustion resulting from the increased efficiency of the new thermal oxidizer. DEQ updated the permit to include monitoring requirements and is requiring source testing to verify the capture and control efficiencies of the coating line and thermal oxidizer, respectively.

How do I participate?

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

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

Fax: 503-229-6945

Email: NWRAQPermits@deq.state.or.us

Written comments are due by 5 p.m. Saturday Nov. 14, 2020.

About the facility

Dynic USA is located at 4750 NE Dawson Creek Drive in Hillsboro. DEQ last issued the permit on Nov. 16, 2007.

Dynic USA operates a thermal transfer ribbon manufacturing facility. Various organic solvents are used in the manufacturing process. The facility includes a coating line and a natural gas fired boiler. Volatile organic compound and hazardous air pollutant emissions from the coating line are routed to a thermal oxidizer for control.

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. The permittee would also be required to report instances of excess emissions of a nature that could endanger public health, and submit annual reports, including operating parameters for demonstrating compliance with permit conditions. DEQ also conducts facility inspections and reviews annual reports for actual emissions generated by the facility's overall operations.

What happens after the public comment period ends?

DEQ considers and responds to all comments received during the public comment period and may modify the proposed permit based on comments. 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 <https://go.usa.gov/xEJf2> or contact:

Northwest Region AQ Permit Coordinator

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

Fax: 503-229-6945

Email: NWRAQPermits@deq.state.or.us

View the application and related documents in person at the DEQ office in Portland. For a review appointment, call 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.



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Northwest Region
Air Quality Program
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Fax: 503-229-6945

Contact: Josh Alexander

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)
Nitrogen oxides	39	39
Carbon monoxide	99	99
Volatile organic compounds	39	39

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

Hazardous air pollutants:

Dynic USA Corporation is not a major source of hazardous air pollutants because the permit requires controls that maintain emissions below major source levels. EPA has determined that these types of businesses do not warrant such regulation. In the past calendar year, Dynic USA Corporation estimated total hazardous air pollutants emissions of 1.76 tons per year and 1.75 tons per year of Toluene.

Table 2

Hazardous Air Pollutants	Potential Emissions (tons/yr)	Actual Emissions (tons/yr)
Toluene	2.5	1.75

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:

Dynic USA Corp.
4750 NE Dawson Creek Drive
Hillsboro, OR 97124

INFORMATION RELIED UPON:

Application No.: 026728
Date Received: 02/03/2012

PLANT SITE LOCATION:

4750 NE Dawson Creek Drive
Hillsboro, OR 97124

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Hillsboro
Approval Date: 06/04/1996

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Matt Hoffman, Northwest Region Air Quality Manager

Date

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

Table 1 Code	Source Description	SIC/NAICS
Part B, 60	Paper or other substrate coating subject to RACT	3861/325992

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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	Device ID	Pollution Control Device Description	PCD ID
6.2 MMBtu/hr Clayton boiler	Boiler 1	NA	NA
Polyester ribbon coating line	Coating Line 1	CPI Triton-15.95 regenerative thermal oxidizer	RTO 2

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must ensure that emissions from any air contaminant source does not equal or exceed 20% opacity. EPA Method 9 will be used for compliance.

2.2. Fugitive Emissions

- a. In no case may the permittee allow fugitive dust emissions to 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 by EPA method 22 with the minimum observation time of six minutes.
- b. At least quarterly, the permittee must conduct a six (6) minute visible emission survey of the property boundary downwind from the fugitive emissions sources using EPA Method 22. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be trained and knowledgeable with respect to the general procedures for determining the presence of visible emissions. For purposes of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. No monitoring is required if the entire facility is shut down. [OAR 340-208-0210]
- c. If requested by DEQ, the permittee must:
 - i. Prepare and submit a fugitive emission control plan within 60 days of the request;
 - ii. Implement the DEQ approved plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period; and
 - iii. Keep the plan on site and make the plan available upon request. [OAR 340-208-0210]

2.3. Particulate Matter Emissions

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

- a. Particulate matter emissions from Boiler 1 must not exceed 0.14 grains per dry standard cubic foot. [OAR 340-228-0210(2)(b)(B)]
- b. 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 50% excess air. [OAR 340-228-0210(2)(c)]
- c. Particulate matter emissions from any device or process (other than fugitive emissions sources and 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 the emission of odorous or other fugitive emissions so as to create nuisance conditions off the permittee's property. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300]

2.6. 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, odor, or nuisance concerns associated with the permitted facility. Documentation must include: [OAR 340-214-0114]

- a. The date the complaint was received;
- b. The date and time the complaint states the condition was present;
- c. A description of the pollution or odor condition;
- d. The location of the complainant/receptor relative to the plant site;
- e. The status of plant operation or activities during the complaint's stated time of pollution or odor condition; and
- f. A record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

2.7. Fuels and Fuel Sulfur Content

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

3.0 SPECIFIC PERFORMANCE AND EMISSION STANDARDS

3.1. Reasonably Achievable Control Technology (RACT) – Surface Coating in Manufacturing, Paper Coating

The permittee must ensure that VOC emissions from its ribbon coating line (Coating Line 1) do not exceed 2.9 pounds per gallon, excluding water and exempt solvents, and based on a daily weighted average of VOC content. Compliance is demonstrated through the continuous operation of RTO 2 at or above 1400 degrees F when Coating Line 1 is in operation. Ribbon coating activities include the mixing area, application area, flashoff area, air and forced air dryer, and oven used in the surface coating. [OAR 340-232-0160]

3.2. Operation of Pollution Control Devices and Processes

The permittee must operate and ensure proper functioning of all air pollution control devices and components at all times when the associated emission source is operating, including the following: the temperature in the combustion chamber of RTO 2 must be continuously monitored and maintained at or above 1400 degrees F. [OAR 340-226-0120]

- a. RTO 2 must be in operation whenever Coating Line is in operation;
- b. A temperature monitoring system must be installed to continuously monitor the temperature of the RTO 2 combustion chamber and record the average RTO 2 combustion chamber temperature at least once every 5 minutes, during all periods of operation;
- c. The permittee must operate RTO 2, including scheduled maintenance, in accordance with the manufacturer's instructions and performance specifications; and
- d. The permittee must maintain the RTO 2 average chamber temperature as follows:
 - i. The RTO 2 average chamber temperature must be maintained at a minimum temperature of 1400° F during all periods of operation; and
 - ii. The RTO average chamber temperature above is based on a three-hour rolling average.

3.3. 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 as provided below. [OAR 340-226-0100]

- a. The permittee must install audible and visual alarms, if not already installed, that notify the permittee when the temperature of the RTO 2 combustion chamber falls below 1400 degrees F.
- b. The permittee must take corrective action within 30 minutes to return to highest and best practicable treatment and control upon the RTO 2 combustion chamber falling below 1400 degrees F, or Coating Line 1 must be shut down until repairs are made and the temperature of the RTO 2 combustion chamber can be maintained at or above 1400 degrees F; and

- c. The exceedance of an action level is not a violation of an emission limit or condition in this permit, but failure to take corrective action is a violation. [OAR 340-226-0120(2)(d)]

4.0 PLANT SITE EMISSION LIMITS

4.1. 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
NO _x	39	Tons per year
CO	99	
VOC	39	

4.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [OAR 340-222-0035]

5.0 COMPLIANCE DEMONSTRATION

5.1. 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. Total facility operating time (hours/year);
- b. Quantity of natural gas combusted at the facility, monthly, in MMft³;
- c. Type, quantity and VOC content of coating materials (inks and solvents) used, daily;
- d. Type, quantity and VOC content of cleaning solvents used, monthly;
- e. Quantity and VOC content of coating materials and cleaning solvents shipped offsite, monthly;
- f. RTO 2 average chamber temperature at least once every 5 minutes. Monitored data must be reduced to three-hour rolling average RTO 2 chamber temperature;
- g. Dates, times, durations and corrective actions taken for each shutdown of Coating Line 1 resulting from the combustion chamber temperature of RTO 2 dropping below 1400 degrees F; and
- h. Any other parameters or processes required for the annual report.

5.2. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the emissions for each 12-consecutive calendar month period based on the following calculation for each pollutant: [OAR 340-222-0080]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

- E = pollutant emissions (tons/year);
- Σ = symbol representing “summation of”;
- EF = pollutant emission factor (see Condition 12.0);
- P = process production (natural gas combusted in MMft³)

5.3. Emission Factors

The permittee must use the default emission factors provided in Condition 12.0 for calculating pollutant emissions, unless alternative emission factors are approved in writing by DEQ. The permittee may request or DEQ may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by DEQ. [OAR 340-222-0080]

5.4. Greenhouse Gas Emissions

The permittee must calculate greenhouse gas emissions in metric tons and short tons for each 12-consecutive calendar month period to determine compliance with the GHG PSEL by using the following: [OAR 340-215-0040]

- a. DEQ Fuel Combustion Greenhouse Gas Calculator
<https://www.oregon.gov/deq/FilterDocs/ghgCalculatorFuelCombust.xlsx>; and
- b. EPA emission quantification methodologies as prescribed in 40 CFR Part 98 subparts E through UU
- c. <https://ccdsupport.com/confluence/display/help/Optional+Calculation+Spreadsheet+Instructions>.

5.5. Mass Balance with controls

The permittee must calculate the VOC emissions from the coating line for each 12 consecutive calendar month period based on the following formula: [OAR 340-222-0080]

$$E_{\text{VOC-A}} = [\Sigma(C_x \times D_x \times K_x) - W_x](1 - (CE \times DE)) \times (1 \text{ ton}/2,000 \text{ pounds})$$

where:

- $E_{\text{VOC-A}}$ = Annual VOC emissions in tons
- C = Material usage for the period in gallons
- D = Material density in pounds per gallon

- K = VOC concentration in pounds of VOC per pound of material, expressed as a decimal
- x = Subscript x represents a specific material
- CE = VOC capture efficiency expressed as a decimal (equal to or less than the capture efficiency demonstrated by source testing required by Condition 6.0; 1.00 until source testing has been completed)
- DE = Destruction efficiency expressed as a decimal (equal to or less than the destruction efficiency demonstrated by source testing required by Condition 6.0; 0.98 until source testing has been completed)
- W = Weight of VOC shipped offsite in pounds

5.6. PSEL Compliance Monitoring

The permittee must demonstrate compliance with the PSEL by totaling the emissions from all point sources calculated under Conditions 5.2 and 5.5. [OAR 340-222-0080]

6.0 SOURCE TESTING

6.1. Source Testing Requirements

The permittee must perform the following source tests within 120 days of permit issuance unless an extension is approved by DEQ: [OAR 340-212-0120]

- a. The permittee must conduct a source test to determine the VOC capture and destruction efficiency of Coating Line 1 and RTO 2, respectively. During the source test, the following parameters must be monitored and recorded:
 - i. Visible emissions as measured by EPA Method 9 for a period of at least six minutes during or within 30 minutes of each test run;
 - ii. Temperature in each RTO chamber;
 - iii. RTO average chamber temperature;
 - iv. RTO bed cycle frequency;
 - v. Exhaust gas flow rates at the inlet and outlet of the RTO;
 - vi. VOC concentration and mass emissions at the inlet and outlet of the RTO, measured as propane;
 - vii. Production information from the coating lines: material being coated, coating type, solvent composition, solvent usage and VOC concentration;
 - viii. RTO natural gas usage; and
 - ix. Other data agreed upon by DEQ, the permittee and the tester.
- b. The EPA Methods listed in the table below must be used to measure the volumetric flow rates and VOC concentrations at inlet and outlet of RTO 2. Results must be reported as concentration (ppmvd) and emission rate (lb/hr), measured as propane;

- i. Three one-hour minimum test runs must be conducted;
 - ii. The capture efficiency of Coating Line 1 shall be confirmed by EPA Method 204; and
 - iii. At the option of the permittee, methane and ethane emissions may be measured by EPA Method 18, concurrently with the Method 25A test, and the concentrations be subtracted from the total hydrocarbon emissions.
- c. The inlet and exhaust stacks of the RTO must be configured to comply with EPA Test Method 1 and appropriately equipped with sample ports for collecting samples and velocity traverse data;
 - d. Production through the coating lines and drying ovens at the time of testing must be representative of normal maximum operating conditions;
 - e. The test report should include:
 - i. The measured DE observed during each test run as well as the overall three test run average DE;

The RTO destruction efficiency will be determined for each test run as follows:

$$DE = [(VOC_{in} - VOC_{out}) / VOC_{in}] * 100$$

Where:

DE = Destruction efficiency, (%);

VOC_{in} = VOC at the inlet to the RTO (lb/hr);

VOC_{out} = VOC at the outlet of the RTO (lb/hr)

- ii. VOC emissions at the inlet and outlet, expressed as ppmvd and lb/hr, measured as propane; and
 - iii. RTO 2 average chamber temperature observed during each test run and the three run test average temperature.
- f. All tests must be conducted in accordance with DEQ's Source Sampling Manual and the approved source test plan. The source test plan must be submitted at least 30 days in advance and approved by the Regional Source Test Coordinator. The source test report must be submitted to the Regional Source Test Coordinator within 60 days of the test unless otherwise approved in the source test plan; and

Tested Pollutant	Reference Test Method*
VOC	EPA Methods 1, 2, 3, 4 and 25A
Permanent Total Enclosure	EPA Method 204
Opacity	EPA Method 9

*Substitution of alternative test methods must be pre-approved by the DEQ.

- g. Only regular operating staff may adjust the combustion system or production processes and emission control parameters during the source test and within two hours prior to the source test. Any operating adjustments made during the source test, which are a result of consultation with source testing personnel, equipment vendors or consultants, may render the source test invalid.

7.0 RECORDKEEPING REQUIREMENTS

7.1. 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. Total facility operating time (hours/year);
- b. Quantity of natural gas combusted at the facility, monthly, in MMft³;
- c. Type and quantity of coating materials (inks and solvents) used, in gallons, daily;
- d. VOC content of coating materials used, in lb/gal, daily;
- e. Type and quantity of cleaning solvents used, in gallons, monthly;
- f. VOC content of cleaning solvents used, in lb/gal, monthly;
- g. Type and quantity of coating materials and cleaning solvents purchased, monthly;
- h. Quantity and VOC content of coating materials and cleaning solvents shipped offsite, in pounds, monthly;
- i. RTO 2 average chamber temperature at least once every 5 minutes. Monitored data must be reduced to three-hour rolling average RTO 2 chamber temperature;
- j. Dates, times, durations and corrective actions taken for each shutdown of Coating Line 1 resulting from the combustion chamber temperature of RTO 2 dropping below 1400 degrees F;
- k. Fugitive emissions (EPA Method 22) observation log (at least quarterly); and
- l. Any other parameters or processes required for the annual report.

7.2. 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, recorded on occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity as a six-minute block average.
 - 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. If startups or shutdowns may result in excess emissions, the permittee must submit startup/shutdown procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 340-214-0310. 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.
 - e. If permittee anticipates that scheduled maintenance may result in excess emissions, the permittee must submit scheduled maintenance procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 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.
 - f. The permittee must maintain a log of all excess emissions in accordance with OAR 340-214-0340(3).

7.3. Complaints

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means according to Condition 2.6. Documentation must include all information identified in Condition 2.6. [OAR 340-214-0114]

7.4. 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]

8.0 REPORTING REQUIREMENTS

8.1. 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. Initial 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 10.0 by email, telephone, facsimile, or in person.
- b. When required by DEQ, the permittee must also submit follow-up reports summarizing records of excess emissions as required in Condition 7.1.a within 15 days of the date of the event.

8.2. 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. If February 15 falls on a weekend or Monday holiday, the permittee must submit their annual report on the next business day.

- a. Total facility operating time (hours/year);
- b. Quantity of natural gas combusted at the facility, monthly and 12-month rolling total, in MMft³;
- c. Type and quantity of coating materials (inks and solvents) used, in gallons, monthly and 12-month rolling total;
- d. VOC content of coating materials used, in lb/gal;
- e. Type and quantity of cleaning solvents used, in gallons, monthly and 12-month rolling total;
- f. VOC content of cleaning solvents used, in lb/gal;
- g. Quantity and VOC content of coating materials and cleaning solvents shipped offsite, in pounds, monthly and 12-month rolling total;
- h. Dates and times of any periods of time during which the three-hour rolling average RTO temperature was less than 1400 degrees F;
- i. Dates, times and durations for each shutdown of Coating Line 1 resulting from the combustion chamber temperature of RTO 2 dropping below 1400 degrees F;
- j. Calculations of annual pollutant emissions determined each month in accordance with Condition 5.2 and 5.5.
- k. A brief summary listing the date, time, and the affected device/process for each excess emission that occurred during the reporting period.
- l. Summary of complaints relating to air quality received by permittee during the year in accordance with Condition 7.3.
- m. List permanent changes made in facility process, production levels, and pollution control equipment which affected air contaminant emissions.
- n. List major maintenance performed on pollution control equipment.

8.3. 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.

8.4. 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.

8.5. 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.

9.0 ADMINISTRATIVE REQUIREMENTS

9.1. 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 10.2. [OAR 340-216-0040]

9.2. Permit Modifications

Application for a modification of this permit must be submitted at least 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.

9.3. 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 by **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.**

9.4. 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.

9.5. 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.

10.0 DEQ CONTACTS / ADDRESSES

10.1. 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

10.2. Permit Coordinator

The permittee must submit all notices and applications that do not include payment to the Permit Coordinator.

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

10.3. 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

10.4. Web Site

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

11.0 GENERAL CONDITIONS AND DISCLAIMERS

11.1. 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.

11.2. 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.

11.3. 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]

11.4. 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]

11.5. 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.

11.6. Permit Availability

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

11.7. Open Burning

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

11.8. 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.

11.9. 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.

11.10. 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.

11.11. Permit Termination, Revocation, or Modification

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

12.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Natural Gas Combustion	NO _x	100	lb/MMcf ³	AP-42, Table 1.4-1
	CO	84	lb/MMcf ³	AP-42, Table 1.4-1
	VOC	5.5	lb/MMcf ³	AP-42, Table 1.4-2

13.0 PROCESS/PRODUCTION RECORDS

Emissions device or activity	Process or production parameter	Frequency
Natural gas combustion	MMcf ³	Monthly and annually
Process coating materials (inks and solvents)	Gallons, VOC content (lb/gal)	Daily, monthly and annually
Cleaning solvents	Gallons, VOC content (lb/gal)	Monthly and annually
Coating materials and cleaning solvents shipped off site	Gallons, VOC content (lb/gal)	Monthly and annually

14.0 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



State of Oregon
Department of
Environmental
Quality

SIMPLE AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Dynic USA Corp.
4750 NE Dawson Creek Drive
Hillsboro, OR 97124-5799

Source Information:

SIC	3861
NAICS	325992
EPA ICIS-Air ID	OR0000004106700017

Source Categories (Table 1 Part, code)	Part B, 60
Public Notice Category	II

Compliance and Emissions Monitoring Requirements:

FCE	
Compliance schedule	
Unassigned emissions	
Emission credits	
Special Conditions	

Source test	Yes 120 days after issuance
COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	2/15
Quarterly report (due dates)	

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

Air Programs

Synthetic Minor (SM)	Yes
SM -80	
NSPS (list subparts)	
NESHAP (list subparts)	
CAO	
NSR	

PSD	
GHG	
RACT	Yes
TACT	
Other (specify)	

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PERMITTING

PERMITTEE IDENTIFICATION

1. Dync USA Corp.
4750 NE Dawson Creek Drive
Hillsboro, OR 97124

PERMITTING ACTION

2. The proposed permit is a renewal of an existing Simple Air Contaminant Discharge Permit (ACDP) that was issued on November 16, 2007 and was originally scheduled to expire on October 1, 2012. The permittee is on a Simple ACDP because there is no General ACDP for which the source qualifies to be assigned. The existing ACDP remains in effect until final action is been taken on the renewal application because the permittee submitted a timely and complete application for renewal.
3. Dync USA has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because the air quality permit application was submitted and deemed complete, or 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. Dync USA has not been called in and therefore, has not performed a risk assessment.

OTHER PERMITS

4. Other permits issued or required by the DEQ for this source include: Large Quantity Hazardous Waste Generator, ID# ORQ000002592.

ATTAINMENT STATUS

5. The source is located in a maintenance area for CO and ozone [NO_x and VOC are precursors to ozone]. The area is in attainment for all other criteria pollutants.
6. The source not located within 10 kilometers of any Class I Air Quality Protection Areas.

SOURCE DESCRIPTION

OVERVIEW

7. The permittee operates a thermal transfer ribbon manufacturing facility. Thermal transfer ribbon is a high speed printing polyester film used to print a wide variety of products that require labeling. Various organic solvents are used in the process both as a delivery mechanism for the ink and a backcoating for the ribbon. After applying the backcoating, the film passes through a dryer, evaporating the solvents which are ducted to a regenerative thermal oxidizer. The facility was built in 1996.
8. The following change has been made to the facility since the last permit renewal: the thermal oxidizer was replaced in 2017 due to the age of the equipment.

PROCESS AND CONTROL DEVICES

9. Existing air contaminant sources at the facility consist of the following:
 - a. One (1) – 6.2 MMBtu/hr Clayton boiler, natural gas fired, without emission controls, installed 1996.
 - b. One (1) – polyester ribbon coating line, with emission controls – see paragraph 10 below.
10. Existing control devices at the facility consist of the following: one (1) – Catalytic Products International TRITON-15.95 regenerative thermal oxidizer, installed 2017.

CONTINUOUS MONITORING DEVICES

11. The temperature in the combustion zone of the oxidizer is continuously monitored. The combustion chamber temperature must be maintained at or above 1400 degrees F.

COMPLIANCE HISTORY

12. The facility was inspected on July 27, 2010 and March 25, 2015 and found to be in compliance with all permit conditions.
13. During the prior permit period there were no complaints recorded for this facility.
14. No enforcement actions have been taken against this source since the last permit renewal.

EMISSIONS

15. 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)
NO _x	0	NA	0	39	39	0
CO	0	NA	0	99	99	0
VOC	0	NA	0	39	39	0

- a. The baseline emission rate was established in previous permitting actions and there is no new information that effects the previous determination.
- b. The netting basis is zero for Simple ACDPs in accordance with OAR 340-222-0046(2).
- c. The previous PSEL is the PSEL in the last permit.
- d. For Simple ACDPs, the proposed PSELs for all pollutants are equal to the Generic PSELs in accordance with OAR 340-216-0064(3)(b).
- e. The potential to emit for this facility is 1.33 tons NO_x and 1.18 tons CO based on the operation of the boiler at 4,380 hours per year. Actual emissions in 2019 were 0.90 tons of NO_x and 0.76 tons of CO. Actual emissions have gone down significantly since 2017 when the new CPI TRITON regenerative thermal oxidizer (RTO) was installed. This is attributed to the new RTO operating more efficiently than the previous model, resulting in less natural gas combusted.
- f. Actual emissions of VOCs were between 6.10 and 8.88 tons each year between 2017 and 2019. This includes a 98% destruction efficiency provided by the (RTO) for VOCs routed from the manufacturing process. VOCs from the operation of the boiler are not routed to the RTO, but only account for a small fraction (1/10th of one ton) of overall VOC emissions.
- g. The permit does not include PSELs for PM/PM₁₀/PM_{2.5} and SO₂ because the potential emissions are less than the de minimis level of 1 ton per year for each pollutant, per OAR 340-200-0020(39).
- h. Actual emissions of Toluene, the single highest emitted Hazardous Air Pollutant (HAP), was 1.75 tons in 2019. This includes a 98% destruction efficiency provided by the RTO and was an increase from 1.36 tons in 2018 and 1.02 tons in 2017. Potential emissions of Toluene are estimated to be 2.5 tons per year.

- i. The permit does not include PSELs for Single HAP or Combined HAP because the potential emissions are less than 10 and 25 tons per year, respectively. See Paragraph 23 for more information.
- j. The PSEL is a federally enforceable limit on the potential to emit.

SIGNIFICANT EMISSION RATE ANALYSIS

16. 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

17. 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.
18. 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).
19. 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).
20. A source that has the potential to emit less than major source thresholds is called a true minor.
21. 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.

CRITERIA POLLUTANTS

22. This facility is a synthetic minor source of criteria pollutant emissions. The basis for this determination can be found in paragraph 15 of this Review Report.

HAZARDOUS AIR POLLUTANTS

23. This source is an area source and not a major source of hazardous air pollutants because the permit requires controls that maintain emissions below major source levels. The following table shows potential emissions and 2019 actual emissions for hazardous air pollutants with actual emissions greater than 1 pound:

Hazardous Air Pollutants	Potential to Emit (pounds/year)	2019 Actual Emissions (pounds/year)
Toluene	5,000	3,492
Xylene	120	60
Total HAP emissions	5,120	3,552

CLEANER AIR OREGON

- 24. The Cleaner Air Oregon Toxic Air Contaminant emissions inventory for this source can be found on this website: https://www.deq.state.or.us/AQPermitonline/34-0017-SI-01_ATEI_2016.PDF
- 25. Dynic USA has not been called in and therefore, has not performed a risk assessment.

TOXICS RELEASE INVENTORY

- 26. 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:
 - a. Cancer or other chronic human health effects;
 - b. Significant adverse acute human health effects; or
 - c. Significant adverse environmental effects.
- 27. 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.
- 28. Dynic USA reported the release of following TRI-listed chemicals for the year 2018:

ON SITE RELEASES BY CHEMICAL

	Quantity Reported			Health Effects	
	Air	Water	Land	Cancer	Other
TOLUENE	1,610				✓

NR - No on-site releases reported for this chemical

29. DEQ has copied this information from EPA's TRI website and does not guarantee the accuracy of this information.

NEW SOURCE PERFORMANCE STANDARDS APPLICABILITY

30. There are no devices/processes at this facility for which a New Source Performance Standard has been promulgated. NSPS that appear applicable but do not apply to devices/processes at this facility are discussed below.
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 one (1) 6.2 MMBtu/hr natural gas fired boiler (Boiler 1) that does not meet the applicability criteria of this federal regulation. Subpart Dc applies to boilers for which construction, modification, or reconstruction commenced after June 9, 1989 and have a maximum design input capacity of 100 MMBtu/hr or less, but greater than 10 MMBtu/hr. Boiler 1 constructed in 1996, but does not meet the design input capacity threshold of 10 MMBtu/hr.
32. 40 CFR Part 60, Subpart RR – “**Standards of Performance for Pressure Sensitive Tape and Label Surface Coating Operations**” is not applicable to the source because it does not manufacture pressure sensitive tape and label materials. The facility only produces thermal transfer ribbon which does not have pressure sensitive properties.

NATIONAL EMISSION STANDARDS FOR HAZARDOUS AIR POLLUTANTS APPLICABILITY

33. There are no sources at this facility for which a National Emission Standard for Hazardous Air Pollutant standard has been promulgated. NESHAP that appear applicable but do not apply to devices/processes at this facility are discussed below.
34. 40 CFR Part 63, Subpart JJJJ – “**Standards for Hazardous Air Pollutants for Paper and Other Web Coating**” is not applicable to the source because it is not a major source of hazardous air pollutants (HAPs). The source is an area source because the permit requires controls that maintain emissions below major source levels. These emission standards apply to facilities with web coating lines that are major sources of HAPs.

GREENHOUSE GAS REPORTING APPLICABILITY

35. 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. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

REASONABLY AVAILABLE CONTROL TECHNOLOGY APPLICABILITY

36. The facility is located in the Portland AQMA and is subject to Reasonably Available Control Technology (RACT) under OAR 340-232-0160(5)(d), surface coating in manufacturing, paper coating. Division 232 applies to coating operations subject to RACT Emission Standards for VOC Point Sources. The maximum allowable VOC content of coatings used is 2.9 pounds/gallon. Compliance with the limit is achieved through the operation of a regenerative thermal oxidizer. The permit previously included an alternative means of demonstrating compliance for coating solids. It was removed because the rule does not specify a pounds/gallon limit for solids.

TYPICALLY ACHIEVABLE CONTROL TECHNOLOGY APPLICABILITY

37. Typically Achievable Control Technology (TACT) for VOCs is not applicable for sources subject to RACT.

SOURCE TESTING**PRIOR TESTING RESULTS**

38. The results of the most recent source tests are listed below:

Emission Device	Test Date	Pollutant	Measured Value	Permit Requirement
RT01	4/19/06	VOC	98.97%	98%

39. Prior the de-listing of MEK as a HAP in 2005, the permittee undertook to prove “full enclosure” of the polyester film surface coating operation. The purpose was to prove 100% capture of the MEK emissions from the process. The permittee’s claim of full enclosure for the surface coating operation was accepted by DEQ on 6/24/07. A copy of the memo is archived in the facility’s file.

PROPOSED TESTING

40. The permittee must conduct a source test of the polyester ribbon coating line (Coating Line 1) and the regenerative thermal oxidizer (RTO 2) within 120 days of permit issuance using EPA Method 9 for Opacity and EPA Method 25A for VOCs.

PUBLIC NOTICE

- 41.** 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 October 15, 2020 and the comment period will end on November 14, 2020 at 5 p.m.**

ja:ltb