

STANDARD
AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
Northwest Region
1515 NW Eastman Parkway, Suite 290
Gresham, Oregon 97030
(503) 667-8414

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:

Allied Systems
21433 SW Oregon Street
Sherwood, OR 97140

INFORMATION RELIED UPON:

Application No.: 021341
Date Received: 2/07/05

PLANT SITE LOCATION:

21433 SW Oregon Street
21555 SW Oregon Street
Sherwood, OR 97140

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Sherwood
Approval Date: 05/16/97

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Ed Druback, Northwest Region Air Quality Manager

Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-0020):

Table 1 Code	Source Description	SIC
Part C, 4	Facility subject to RACT for Surface Coating in Manufacturing > 10 tons/year VOC	3536

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1.0 GENERAL EMISSION STANDARDS AND LIMITS

- 1.1. Visible Emissions** The permittee must ensure that emissions from any air contaminant source does not equal or exceed 20% opacity for a period aggregating more than 30 seconds in any one hour.
- 1.2. Particulate Matter Emissions** The permittee must ensure that particulate matter emissions from any air contaminant source other than fugitive emission sources must not exceed 0.1 grains per standard cubic foot.
- 1.3. Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions by:
- a. Treating vehicular traffic areas of the plant site under the control of the permittee.
 - b. Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
- 1.4. Particulate Matter Fallout** The permittee must not cause or permit the emission 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. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 1.5. 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 Department personnel.

2.0 REASONABLY AVAILABLE CONTROL TECHNOLOGY (RACT)

- 2.1. RACT Surface Coating Limits** The permittee must ensure that VOC emitted from the coating lines does not exceed the following limit, on a daily averaging basis:
- a. 3.5 pounds of VOC per gallon, as applied, less water and exempt solvents, for coatings and thinners used as forced air/air dried coating.

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 3.1. Work practices** The permittee must adhere to the following work practices:
- a. Spray application equipment must be cleaned in enclosed gun cleaners, except for nozzle cleaning during color changes.
 - b. Solvents and solvent soaked rags must be stored in closed containers at all times.
 - c. The plant manager or other responsible party must conduct a monthly visual inspection of all containers to ensure that containers of VOC materials are covered when not in use.

4.0 PLANT SITE EMISSION LIMITS

4.1. Plant Site Emission Limits (PSEL) Plant site emissions must not exceed the following:

Pollutant	Limit	Units
VOC	39	Tons per year

4.2. Annual Period The annual plant site emissions limits apply to any 12-consecutive calendar month period.

5.0 COMPLIANCE DEMONSTRATION

5.1. VOC Emission Compliance Monitoring The permittee must monitor the operation and maintenance of the plant and associated air contaminant devices as follows.

VOC emissions for each 12 consecutive calendar month period are calculated by the following formulas:

Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E_{VOC-A} = \Sigma(12 \text{ consecutive } E_{VOC-Monthly} \text{ rates}) * \{1\text{ton}/2000\text{lb}\}$$

$$E_{VOC-Monthly} = \Sigma\{(C_x * D_x * K_x) - W_x\}$$

Where:

E_{VOC-A} = Plant site VOC emission rate in tons/yr for a respective 12-month monitoring period.

$E_{VOC-Monthly}$ = VOC mass balance emission calculation {see Conditions 6.1.b and 6.1.c} for a respective calendar month period (in pounds).

and:

C = Material usage for the period in gallons
 D = Material density in pounds per gallon
 K = VOC concentration expressed as a decimal
 X = Subscript X represents a specific VOC containing material

W = Mass of pollutant not emitted (disposal of, shipped offsite, polymerized etc.). "W" may be based upon the prior year's percentage, but must be reconciled to actual by the December calculations; or may be represented as zero for conservative monthly reporting

Note: D*K may be replaced by a material's known VOC lb/gal.

5.2. RACT Compliance Monitoring

The permittee must demonstrate compliance with the RACT VOC limitation of Condition 2.1 for each 24-hour calendar day that surface coatings are applied. Compliance is demonstrated by the following methods as applicable:

- a. The permittee is exempt from the calculation requirements of Condition 5.2.b below when RACT compliance is achieved by applying exclusively RACT compliant coatings. For any such operation day the permittee must demonstrate compliance with the RACT VOC limitation of Condition 2.1 by complying with the monitoring requirements of Conditions 6.1.
- b. For each 24-hour calendar day when surface coating operations are performed in which RACT non-compliant coatings are applied, the permittee must demonstrate compliance with the RACT VOC limitation of Condition 2.1 using the following formulas:

$E_{\text{-RACT}}$ = The average surface coating emission rate for Surface coatings applied in a respective Calendar day, expressed as pounds per gallon of surface coating applied.

SC = The total VOCs emitted from surface coating Operations in a respective calendar day, expressed in pounds (lb):

$$SC = \sum\{(C_x * D_x * K_x)\}$$

and:

C = Coating usage for the period in gallons
D = Coating density in pounds per gallon
K = VOC concentration expressed as a decimal

Q X = Subscript X represents a specific material
= The total gallons of surface coatings (less Any contained water and/or exempt solvents) applied in a respective calendar day.

6.0 MONITORING/RECORDKEEPING REQUIREMENTS

6.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices:

- a. Records of surface coatings, thinners, and organic cleaning solvents purchased, showing type of product and VOC content in pounds per gallon, excluding water;
- b. Monthly, record the amount of surface coatings and thinners used in gallons, type (RACT or exempt), and VOC emissions;
- c. Monthly, record of the amount of organic cleaning solvents used in gallons, for preparing surfaces prior to paint application, and VOC emissions;
- d. Monthly, record the hours of operation of the shot-blast baghouse;
- e. Perform a 12-month emission rate calculation in accordance with Condition 5.0
- f. Record the date, time and results of the monthly visual inspection required under Condition 3.1.c.

6.2. RACT Monitoring

- a. The permittee must monitor and maintain records of the as-applied VOC content of all surface coatings used (lb/gal excluding water and exempt solvents), updated upon each occurrence of product formulation change.
- b. The permittee must perform daily monitoring/recordkeeping for each 24-hour operating day during which surface coatings are applied. On each operating day the permittee must identify the name and quantity of each surface coating, as applied, is compliant with the RACT limitation of Condition 2.1.
- c. On each 24-hour day in which exclusively RACT compliant coatings are applied, no additional monitoring requirements are necessary.

- d. On each 24-hour day in which one or more coatings that are non-compliant for RACT are applied, the permittee must perform a RACT compliance calculation in accordance with Condition 5.2.

6.3. Complaint Log The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

6.4. Retention of Records Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to the Department upon request.

7.0 REPORTING REQUIREMENTS

7.1. Excess Emissions The permittee must notify the Department of excess emissions events if the excess emission is of a nature that could endanger public health.

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

7.2. Annual Report For each year this permit is in effect, the permittee must submit to the Department by **February 15** two (2) copies of the following information for the previous calendar year:

- a. Operating parameters:
 - i. Summary of each 12-month VOC emission rate calculation performed in accordance with Condition 5.1 for each month of the preceding calendar year.
 - ii. A summary of compliance with the RACT VOC limit of Condition 2.1 for the previous calendar

year. The summary must identify all operating days of the previous calendar year on which a RACT compliance calculation was required to be performed by Condition 5.2 and for which an exceedance of the allowable RACT limit of Condition 2.1 occurred.

- iii. Hours of operation for the shot-blast baghouse for the preceding calendar year;
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by permittee during the year.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - e. List major maintenance performed on pollution control equipment.
- 7.3. Notice of Change of Ownership or Company Name** The permittee must notify the Department in writing using a Departmental “Permit Application Form” within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 7.4. Construction or Modification Notices** The permittee must notify the Department in writing using a Departmental “Notice of Construction Form,” or “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.
- 7.5. Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the DEQ’s Northwest Region office where the source is located as identified in

Condition 8.3.

8.0 ADMINISTRATIVE REQUIREMENTS

- 8.1. Permit Renewal Application** The completed application package for renewal of this permit is due on 07/01/11. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in condition 8.3
- 8.2. Permit Modifications** Application for a modification of this permit must be submitted not less than **60** days prior to the source modification. 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 Business Office of the Department.
- 8.3. Permit Coordinator Addresses** All reports, notices, and applications should be directed to the Permit Coordinator at the DEQ Northwest Regional office. The Permit Coordinator addresses are as follows:

Counties	Permit Coordinator Address and Telephone
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Northwest Region 2020 SW 4th Avenue, Suite 400 Portland, OR 97201-4987 Telephone: (503) 229-5582

- 8.4. Department Contacts** Information about air quality permits and the Department's regulations may be obtained from the DEQ web page at www.deq.state.or.us. All inquiries about this permit should be directed to the DEQ's Northwest Regional office for the area where the source is located.

Counties	Office Address and Telephone
Clackamas, Clatsop, Columbia, Multnomah, Tillamook, and Washington	Department of Environmental Quality Portland Office 2020 SW 4th Avenue, Suite 400 Portland, OR 97201-4987 Telephone: (503) 229-5554

9.0 FEES

- 9.1. Annual Compliance Fee** The Annual Fee specified in OAR 340-216-0020, Table 2, Part 2 for a Standard ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by Department regulations, will be mailed prior to the above date.
- 9.2. Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company.
- 9.3. Special Activity Fees** The special activity fees specified in OAR 340-216-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit.
- 9.4. Where to Submit Fees** Fees must be submitted to:
Department of Environmental Quality
Business Office
811 SW Sixth Avenue
Portland, Oregon 97204-1390

10.0 GENERAL CONDITIONS AND DISCLAIMERS

- 10.1. Permitted Activities** This permit allows the permittee to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, or is revoked.
- 10.2. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by the Department.
- 10.3. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 10.4. 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.
- 10.5. Department Access** The permittee must allow the Department'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.

- 10.6. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 10.7. Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340 Division 264.
- 10.8. 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 limit to, demolition, renovation, repair, construction, and maintenance.
- 10.9. 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.
- 10.10. Termination, Revocation, or Modification** The Department may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

11.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

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

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