

**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY
OREGON TITLE-V OPERATING PERMIT**

**Northwest Region
2020 S.W. 4th Avenue, #400
Portland, OR 97201-4987
Telephone: (503) 229-5263**

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:

Gunderson, LLC
4350 NW Front Avenue
Portland, OR 97210

INFORMATION RELIED UPON:

Application No.: 021328
Received: 02/17/2005

PLANT SITE LOCATION:

Gunderson, LLC
4350 NW Front Avenue
Portland, OR 97210

LAND USE COMPATIBILITY STATEMENT:

From: The City of Portland
Date: 07/14/95

ISSUED BY DEPARTMENT OF ENVIRONMENTAL QUALITY

Cory Ann Wind, Northwest Region Air Quality Manager

Date

Nature of Business: Manufacturing of Railcars and Marine Barges

Primary SIC: 3743

RESPONSIBLE OFFICIAL:

Name: Howard Werth
Title: Senior Vice President, Finance

FACILITY CONTACT PERSON

Name: Robert A. Bridgers
Title: Environmental Specialist, Emergency
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LIST OF ACRONYMS USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit
CFR	Code of Federal Regulations
CO	Carbon monoxide
DEQ	Oregon Department of Environmental Quality
dscf	dry standard cubic foot
EF	emission factor
EPA	US Environmental Protection Agency
EU	Emissions unit
FCAA	Federal Clean Air Act
gr/dscf	grains per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by OAR 340-032-0130
HCFC	Halogenated Chloro-Fluoro-Carbons
MACT	Maximum Achievable Control Technology
MMBtu	Million British thermal units
MMCF	Million cubic feet
NO _x	Oxides of nitrogen
O ₂	Oxygen
OAR	Oregon Administrative Rule
ORS	Oregon Revised Statute
Pb	Lead
PCD	Pollution control device
POTW	Publicly Owned Treatment Works
PM	Particulate matter
PM ₁₀	Particulate matter less than 10 microns in size
ppm	Parts per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
scf	Standard cubic foot
SER	Significant Emission Rate
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
ST	Source test
TSP	Total Suspended Particulate
VE	Visible emissions
VOC	Volatile organic compound

Modified EPA Method 9: As used in this permit “Modified EPA Method 9” is defined as follows:

Opacity must be measured in accordance with EPA Method 9. For all standards, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. [See also the definition of “Opacity” in OAR 340-208-0010]

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]
2. All conditions in this permit are federally enforceable except conditions 4, 5, 9, 15, 22, 25, and 32, which are enforceable by the state only: [OAR 340-218-0060].

EMISSION UNIT (EU) AND POLLUTION CONTROL DEVICE IDENTIFICATION

3. Emissions units regulated by this permit are the following: [OAR 340-218-0040(3)]

Emissions Unit	EU ID
Shot and grit blasting (Fugitive)	2-BLF
Shot and grit blasting, (Baghouses 1, 2, 3)	2-BLB123
Shot and grit blasting, (Baghouses 4 and 5)	2-BLB45
Plasma/Oxy-fuel metal cutting devices	3-TC
Natural gas combustion devices	4-NG
Welding	5-WLD
RACT Coatings	6-COAT
Shipbuilding and Repair MACT Coatings	7-SMCT
Uncontrolled Painting Overspray - fugitive particulate matter	8-OSPRYM
Paint Overspray -controlled particulate matter	8-OSPRY
Facility wide VOCs (for PSELs)	9-VOC
Surface Coating of Miscellaneous Metal Parts and Products	10-SCMP
Fictional emission unit used to account for the difference between actual emissions and the rule requirement to set minimum PSELs at the Generic PSEL level [OAR 340-222-0041(1)]	11-PSEL _{diff}

- 2-BLF This emissions unit includes fugitive particulate emissions from sand, shot and grit blasting activities, which are uncontrolled.
- 2-BLB123 This emissions unit includes particulate emissions from sand, shot and grit blasting activities, which are controlled by baghouses BGHS1, BGHS2, and BGHS3, installed before 1971. These emissions are point source emissions.

2-BLB45	This emissions unit includes particulate emissions from sand, shot and grit blasting activities, which are controlled by baghouse BGHS4, installed in 1990 and future baghouse BGHS5. These emissions are point source emissions.
3-TC	This emissions unit includes fugitive particulate emissions from metal cutting and fabrication operations.
4-NG	This emissions unit includes gaseous and particulate emissions from all natural gas combustion devices, which are not insignificant (aggregate or categorical). These emissions are point source emissions.
5-WLD	Fugitive gaseous and particulate emissions are included in this emissions unit.
6-COAT	This emissions unit includes all coatings, which are not included in one or more of the following: <ol style="list-style-type: none">1) Coatings included in 7-SMCT;2) Markings by stencil for railroad cars;3) High performance inorganic zinc coatings, air dried, applied to fabricated steel; or4) Insignificant activities.
7-SMCT	This emissions unit includes VOC emissions from all coatings covered by the Shipbuilding and Repair coating MACT (NESHAP).
8-OSPRYM	This emissions unit includes fugitive particulate matter emissions resulting from painting performed outside of spray booths. This is primarily marine vessel coating, but may include touch-up of railcar coatings performed outside spray booths.
8-OSPRY	This emissions unit regulates particulate matter emissions resulting from painting overspray, which is controlled by spray booth filters.
9-VOC	This emissions unit includes VOC emissions from all painting and other VOC emitting activities facility-wide, for purposes of complying with the daily VOC PSEL.
10-SCMP	This emissions unit pertains to all coatings that contain hazardous air pollutants in the surface coating of all miscellaneous metal parts and products, which is covered by the Surface Coating of Miscellaneous Metal Parts and Products, Subpart MMMM NESHAP.
11-PSEL _{diff}	This fictitious emission unit is included in the permit solely to account for the difference between actual emissions and the rule requirement to set minimum PSELs at the Generic PSEL level as set out in OAR 340-222-0041(1).

The following tables contain summaries of applicable requirements, other than the Plant Site Emission Limit (PSEL), along with the monitoring methods for the emissions units to which those requirements apply.

FACILITY WIDE EMISSION LIMITS AND STANDARDS

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Monitoring	Condition
Particulate Matter Size Standard OAR 340-208-0450,	4	PM >250 microns	N/A	Complaint Log	32
Fugitive Odor Nuisance Conditions OAR 340-208-0300	5	Fugitive Odor	Odor strength #0 Odor strength #2	Complaint Log	32
Fugitive Particulate Nuisance Conditions OAR 340-208-0210(2)	6	Fugitive Particulate	N/A	Visible Emission Survey	35
Source Emission Reduction Plan OAR 340-206-0050	7	N/A	N/A	Recordkeeping	36
Accidental Release Prevention 40CFR 68	8	Accidental Releases	N/A	Recordkeeping	See CFR

4. The permittee shall not cause, or permit the emission of any particulate matter, which is larger than 250 microns in size provided such particulate matter does or will deposit upon the real property of another person. [OAR 340-208-0450] This condition is only enforceable by the State.
5. The permittee shall not cause or permit the emission of odorous matter in such a manner as to cause a public nuisance in accordance with OAR 340-208-0300. This condition is only enforceable by the State.
6. The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions include, but are not be limited to the following: [OAR 340-208-0210(2)]
 - 6.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - 6.b. Application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
 - 6.c. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
 - 6.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - 6.e. Adequate containment during sandblasting or other similar operations;
 - 6.f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
 - 6.g. The prompt removal from paved streets of earth or other material, which does or may become airborne.

7. In the event an Air Pollution Alert, Warning, or Emergency Episode is declared in the Portland Air Quality Maintenance Area by the Department, the permittee shall take the action appropriate to the episode condition as required by OAR 340-206-0050. The permittee shall take such action when the permittee first becomes aware of such a declaration whether through news media, direct contact with the Department, or from other sources. The permittee shall take the actions listed below when an air pollution episode is declared:
- 7.a. **ALERT:** Prepare to cease all painting operations.
- 7.b. **WARNING:** Cease all painting operations and complete all clean-up with solvent within the minimum work shift, not to exceed four hours.
- 7.c. **EMERGENCY:** Continue warning actions.
- During an applicable Air Pollution Episode, this Source Emission Reduction Plan shall be available on the source premises for inspection by Department personnel in accordance with OAR 340-206-0050. [OAR 340206-0050]
8. The permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

EMISSIONS UNIT SPECIFIC EMISSION LIMITS AND STANDARDS

Visible Emissions limits and Particulate Emissions Limitations

Emission Unit(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit	Monitoring Requirements	
					Method	Condition
2-BLF (fugitive)	340-208-0600	9	Opacity	20% (30 sec)	Recordkeeping VE Periodic monitoring	35
	340-208-0110	10	Opacity	20% (3 min)		
2-BLB123 (baghouses)	340-208-0600	9	Opacity	20% (30 sec)	Inspection and Maintenance Recordkeeping	37
	340-208-0110	10	Opacity	20 % (3 min)		
	340-228-0210, 208-0610	11	Particulate	0.2 gr/dscf		
2-BLB45 (baghouses)	340-208-0600	9	Opacity	20% (30 sec)	Inspection and Maintenance Recordkeeping	37
	340-208-0110	10	Opacity	20 % (3 min)		
	340-208-0610	12	Particulate	0.1 gr/dscf		
	340-212-0250	13	Particulate	Corrective Action		
3-TC (fugitive)	340-208-0600	9	Opacity	20% (30 sec)	Recordkeeping	35
	340-208-0110	10	Opacity	20% (3 min)		
Emission Unit(s)	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit	Monitoring Requirements	
					Method	Condition
4-NG	340-208-0110	10	Opacity	20 % (3 min)	Recordkeeping	39
	340-228-0210	14	Particulate	0.1 gr/dscf		
	340-208-0610	15	Particulate	0.27 lbs/ MMBtu		
5-WLD	340-208-0600	9	Opacity	20% (30 sec)	Recordkeeping	35
	340-208-0110	10	Opacity	20 % (3 min)		
8-OSPRYM	340-208-0600	9	Opacity	20% (30 sec)	Visible Emiss. Survey	35
	340-208-0110	10	Opacity	20 % (3 min)		
8-OSPRY	340-208-0600	9	Opacity	20% (30 sec)	Inspection and Maintenance Recordkeeping	42
	340-208-0110	10	Opacity	20 % (3 min)		
	340-208-0610	12	Particulate	0.1 gr/dscf		

9. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from EU IDs 2-BLF, 3-TC, 2-BLB123, 2-BLB45, 5-WLD, 8-OSPRYM, or 8-OSPRY for a period or periods aggregating more than thirty (30) seconds in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. Opacity shall be measured using the test methods identified in condition 47. [OAR 340-208-0600]
This condition is only enforceable by the State.
10. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, from EU IDs 2-BLF, 3-TC, 2-BLB123, 2-BLB45, 4-NG, 5-WLD, 8-OSPRYM, or 8-OSPRY. Visible emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0110]
11. The permittee shall not cause or allow the emission of particulate matter in excess of 0.2 grains per dry standard cubic foot average for any three hour period from EU IDs 2-BLB123 or 8-OSPRY. Particulate emissions shall be measured using the test methods identified in condition 47. [340-228-0210, 340-208-0610]
12. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grains per dry standard cubic foot average for any three hour period from EU ID 2-BLB45. Particulate emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0610]
13. The permittee shall operate EU ID 2-BLB45 within the parameter range specified in this condition, and shall take corrective action to restore operation to the specified parameter range whenever EU ID 2-BLB45 is found to be operating outside the specified range. Corrective action shall commence within two (2) hours of determining that EU ID 2-BLB45 is operating outside the specified range. The operating parameter range is two (2) to seven (7) inches of water column pressure drop. [OAR 340-212-0250]
14. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grains per dry standard cubic foot, corrected to 50% excess air, from EU ID 4-NG. Particulate emissions shall be measured using the test methods identified in condition 47. [OAR 340-228-0210]
15. The permittee shall not cause or allow the emission of particulate matter in excess of 0.27 pounds per million Btu heat input, from any device included in EU ID 4-NG. Particulate emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0610]
This condition is only enforceable by the State.

Applicable Requirement; Maintenance Requirements

Emission Unit(s)	Applicable Requirement	Pollution Control ID	Inspection and Maintenance Requirements	Monitoring Requirements	
				Frequency	Condition
2-BLB123	340-226-0120	BGHS1, BGHS2, BGHS3	Periodic Inspection and Maintenance.	Monthly	37
2-BLB45	340-226-0120	BGHS4, BGHS5	Periodic Inspection and Maintenance.	Monthly	37
8-OSPRY	340-226-0120	Spray booths	Periodic Inspection and Maintenance.	Monthly	42

16. The permittee shall maintain highest and best practicable treatment and control of EU IDs 2-BLB123, 2-BLB45, and 8-OSPRY by inspecting and maintaining the pollution control devices listed above. [OAR 340-218-0050 and 340-226-0120]

RACT, MACT, AND NESHAP STANDARDS

Emission Unit(s)	Applicable Requirement	Condition Number	Pollutant/ Number	Limit	Monitoring Requirements	
					Method	Condition
6-COAT	RACT 340-232-0160	17	Rail coating VOC Content	VOC content limits - See condition 17	Recordkeeping	40
7-SMCT	MACT 40 CFR, Part 63.783	18	Marine vessel coating VOHAP Content	VOHAP content limits - See condition 18	Recordkeeping	41 56
10-SCMP	NESHAP 40 CFR, Part 63, Subpart MMMM	19.b	Surface coating of Misc. Parts/Products	HAP emissions limit – See condition 19	Recordkeeping Reporting	57 66

17. In accordance with OAR 340-232-0160, the emissions of Volatile Organic Compounds from EU ID 6-COAT shall not exceed the following limits on a daily average basis, as measured in accordance with condition 49. [OAR 340-232-0160]
- | | | |
|-------|--|-------------|
| 17.a. | Clear Coatings | 4.3 lb/gal. |
| 17.b. | Forced Air Dried or Air Dried | 3.5 lb/gal. |
| 17.c. | Extreme Performance Coatings | 3.5 lb/gal. |
| 17.d. | Other Coatings (i.e. Powder, oven dried) | 3.0 lb/gal. |

18. The permittee shall comply with the following requirements applicable to EU ID 7-SMCT, marine vessel coating: [40 CFR, Part 63.783]
- 18.a. The permittee shall not cause or allow the application of any coating to a ship with an as-applied VOHAP content exceeding the applicable limit given in Table A below, as determined by the procedures described in conditions 41.b.i through 41.b.iv. For the compliance procedures described in conditions 41.b.i through 41.b.iii, VOC shall be used as a surrogate for VOHAP, and the EPA Reference Method 24 shall be used as the definitive measure for determining compliance. For the compliance procedure described in condition 41.b.iv, an alternative test method capable of measuring independent VOHAP shall be used to determine compliance. The method must be submitted to and approved by the Administrator.
- 18.b. The permittee shall ensure that;
- 18.b.i. All handling and transfer of VOHAP-containing materials to and from containers, tanks, vats, drums, and piping systems is conducted in a manner that minimizes spills.
- 18.b.ii. All containers, tanks, vats, drums, and piping systems are free of cracks, holes, and other defects and remain closed unless materials are being added to or removed from them.

TABLE A: VOHAP Limits for Marine Coatings, EU ID 7-SMCT

Coating Category	VOHAP Limits ^{a, b, c}		
	grams/liter coating minus water and exempt compounds	grams/liter solids ^d	
		t ≥ 4.5°C	t < 4.5°C ^e
General Use :	340	571	728
Specialty:			
Air flask	340	571	728
Antenna	530	1,439	--
Antifoulant	400	765	971
Heat resistant	420	841	1,069
High-gloss	420	841	1,069
High-temperature	500	1,237	1,597
Inorganic zinc high-build	340	571	728
Military exterior	340	571	728
Mist	610	2,235	--
Navigational aids	550	1,597	--
Nonskid	340	571	728
Nuclear	420	841	1,069
Organic zinc	360	630	802
Pretreatment wash primer	780	11,095	--
Repair/maint. of thermoplastics	550	1,597	--
Rubber camouflage	340	571	728
Sealant for thermal spray Aluminum	610	2,235	--
Special marking	490	1,178	--
Specialty interior	340	571	728
Tack coat	610	2,235	--

Undersea weapon systems	340	571	728
Weld-through precon. Primer	650	2,885	--

Notes:

- a: The limits are expressed in two sets of equivalent units. Either set of limits may be used for the compliance procedure described in condition 41.b.i, but only the limits expressed in units of g/L solids (nonvolatiles) shall be used for the compliance procedures described in conditions 41.b.ii through 41.b.iv.
- b: VOC (including exempt compounds listed as HAP) shall be used as a surrogate for VOHAP for those compliance procedures described in conditions 41.b.i through 41.b.iii.
- c: To convert from g/L to lb/gal, multiply by (3.785 L/gal)(1/453.6 lb/g) or 1/120. For compliance purposes, metric units define the standards.
- d: VOHAP limits expressed in units of mass of VOHAP per volume of solids were derived from the VOHAP limits expressed in units of mass of VOHAP per volume of coating assuming the coatings contain no water or exempt compounds and that the volumes of all components within a coating are additive.
- e: These limits apply during cold-weather time periods, as defined in 40 CFR 63.782. Cold-weather allowances are not given to coatings in categories that permit less than 40 percent volume solids (nonvolatiles). Such coatings are subject to the same limits regardless of weather conditions.

18.c. Exemptions:

- 18.c.i. The VOHAP coating limits do not apply to coatings used in volumes of less than 200 liters (52.8 gallons) per year, provided the total aggregate volume of all exempt coatings does not exceed 1,000 liters per year (264 gallons per year). Each container storing exempt coatings shall be clearly labeled as "low-usage exempt," and the volume of each exempt coating applied shall be maintained in the facility's records.
- 18.c.ii. The VOHAP coating limits do not apply to coatings applied with hand-held, non-refillable, aerosol containers or to unsaturated polyester resin (i.e., fiberglass lay-up) coatings. Coatings applied to suitably prepared fiberglass surfaces for protective or decorative purposes are not exempted.

19. The permittee shall comply with the following requirements applicable to EU ID 10-SCMP, Surface Coating of Miscellaneous Metal Parts and Products NESHAP, 40 CFR Part 63 Subpart Mmmm:
- 19.a. The permittee shall comply with the standard by January 2, 2007. [40 CFR 63.3883(b)]
 - 19.b. The permittee shall limit the organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each rolling 12-month compliance period at all times. [40 CFR 63.3890(b)(1)]
 - 19.c. The permittee shall use the compliant material option to demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the limit in condition 19.b and that each thinner and/or other additive, and cleaning material used contains no organic HAP. [40 CFR 63.3891(a)]
 - 19.d. If the permittee uses the complaint material option for any coating operation(s), then no operating limit or work practice standard is applicable. [40 CFR 63.3892(a) and 40 CFR 63.3893(a)]
 - 19.e. The permittee shall determine the mass fraction of organic HAP for each material used by one of the following methods: [40CFR 63.3941(a)]
 - 19.e.i. Method 311 (appendix A to 40 CFR Part 63):
 - 1. Count each organic HAP that is measured to be present at 0.1 percent by mass or more as specified in 29 CFR 1910.1200(d)(4).
 - 2. Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions.
 - 19.e.ii. Method 24 (appendix A to 40 CFR Part 60) to determine the mass fraction of non-aqueous volatile matter which may substitute for mass fraction of organic HAP.
 - 19.e.iii. An alternative method following the procedure outlined in 40 CFR 63.7(f) and which the Department approves.
 - 19.e.iv. Information from the supplier or manufacturer of the material:
 - 1. The permittee shall include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more as specified in 29 CFR 1910.1200(d)(4).
 - 2. If there is a disagreement between information collected from the manufacturer and the results of a test conducted according to the procedures outlined in 19.e.i through 19.e.iii, then the test method results will take precedence unless, after consultation, the permittee demonstrates to the Department's satisfaction that the formulation data is correct.
 - 19.e.v. Solvent blends:
 - 1. May be listed as single components for some materials in data provided by manufacturers.
 - 2. May contain organic HAP, which must be counted toward the total organic HAP mass reaction of the materials.
 - 3. If test or manufacturer's data is not available, the permittee may use the default values for the mass fraction of organic HAP in the solvent blends listed in the tables below.
 - A. If the permittee uses the information provided in the tables below, the solvent blend name or chemical abstract series (CAS) number must match.
 - B. If the permittee uses Tables B or C below, then the permittee must use the values for all solvent blends that match within the table.

- C. If a solvent blend matches at least either the name or CAS number, the permittee shall use the organic HAP mass fractions listed in Table B.
- D. If neither the name nor CAS number match the solvent blend name, the permittee shall use the organic HAP mass fractions listed in Table C.
- E. If the results of a Method 311 test indicate higher values than those listed in Table B or C, then the test results shall take precedence, unless the permittee demonstrates to the Department that the formulation data are correct.

Table B: Default Organic HAP Mass Fraction for Solvents and Solvent Blends

Solvent/Solvent blend	CAS No.	Average Organic HAP Mass Fraction	Typical Organic HAP, Percent by Mass
1. Toluene	108-88-3	1.0	Toluene
2. Xylene(s)	1330-20-7	1.0	Xylenes, ethylbenzene
3. Hexane	110-54-3	0.5	n-hexane
4. n-Hexane	110-54-3	1.0	n-hexane
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene
6. Aliphatic 140	-----	0	None
7. Aromatic 100	-----	0.02	1% xylene, 1% cumene
8. Aromatic 150	-----	0.09	Naphthalene
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene
10. Aromatic solvent	64742-94-5	0.1	Naphthalene
11. Exempt mineral spirits	8032-32-4	0	None
12. Ligroines (VM & P)	8032-32-4	0	None
13. Lactol spirits	64742-89-6	0.15	Toluene
14. Low aromatic white spirit	64742-82-1	0	None
15. Mineral spirits	64742-88-7	0.01	Xylenes
16. Hydrotreated naphtha	64742-48-9	0	None
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene
18. Stoddard solvent	8052-41-3	0.01	Xylenes
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes
20. Varsol® solvent	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene
22. Petroleum distillate mixture	68477-31-6	0.08	4% naphthalene, 4% biphenyl

Table C: Default Organic HAP Mass Fraction for Petroleum Solvent Groups

Solvent Type	Average Organic HAP Mass Fraction	Typical Organic HAP, Percent by Mass
Aliphatic ^a	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene
Aromatic ^b	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene

^a Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

^b Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

- 19.f. The permittee must determine the volume fraction of coating solids for each coating in liters (gal) of coating per liter (gal) for each coating used during the compliance period by either a test, information provided by the manufacturer of the material, or by calculation, as specified below: [40 CFR 63.3941(b)]
- 19.f.i. ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003). Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. If the results from this test disagree with information obtained by using 19.f.ii through 19.f.iv, then the test results will take precedence unless, after consultation, the permittee demonstrates to the Department's satisfaction that the formulation data is correct.
- 19.f.ii. Alternative method upon Department approval. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- 19.f.iii. Information from the supplier or manufacturer.
- 19.f.iv. Calculation of volume fraction of coating solids using the following equation:

Equation 1

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$$

Where:

- V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.
- $m_{volatiles}$ = Total volatile matter content of the coating, including HAP, VOCs, water, and exempt compounds according to Method 24 in appendix A of 40 CFR Part 60, grams volatile matter per liter coating.
- D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, information from the manufacturer, or reference sources.

- 19.g. The permittee must determine the density of each coating using one of the following methods: [40 CFR 63.3941(c)]
- 19.g.i. ASTM Method D1475-98. If the results from this test disagree with information obtained by using 19.g.ii, then the test results will take precedence unless, after consultation, the permittee demonstrates to the Department's satisfaction that the formulation data is correct.
 - 19.g.ii. Information from the supplier or manufacturer.
 - 19.g.iii. Specific gravity data for pure chemicals.
- 19.h. Determine the organic HAP content of each coating by calculating the organic HAP content, kg (lb) or organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using the following equation: [40 CFR 63.3641(d)]

Equation 2

$$H_c = \frac{(D_c)(W_c)}{V_s}$$

Where:

- H_c = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.
- D_c = Density of coating, kg coating per liter (gal) coating, as determined according to condition 19.g.
- W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, as determined according to condition 19.e.
- V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, as determined according to 19.f.

20. The permittee does not need to re-determine the organic HAP content in coatings, thinners and /or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has proper documentation showing the exact same materials sent off-site were received back) and re-used in the coating operation. [40 CFR 63.3941]

INSIGNIFICANT ACTIVITIES EMISSION LIMITS AND STANDARDS

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit
Opacity Rules All Equipment [OARs 340-208-0110]	21	Visible Emissions	20 % Opacity 3 Minute Aggregate
Opacity Rules, Non-Fuel Burning Equipment [OARs 340-208-0600]	22	Visible Emissions	20 % Opacity 30 Second Aggregate
Particulate emission limitation Fuel Burning Equipment [OARs 340-208-0610 and 340-228-0210]	23	Particulate Matter	0.1 gr/dscf
Particulate emission limitation Non-Fuel Burning Equipment [OAR 340-226-0210]	24	Particulate Matter	0.1 gr/dscf
Sulfur Dioxide Emission Standard [OAR 340-208-0630]	25	SO ₂	1000 parts per million
Fuel Oil Sulfur Limit Distillate #1 340-228-0110(1)	26	Distillate fuel oil, ASTM Grade 1	0.3% sulfur
Fuel Oil Sulfur Limit Distillate #2 340-228-0110(2)	27	Distillate fuel oil, ASTM Grade 2	0.5% sulfur
Consumer Spray Paint VOC Content Rules [OAR 340-242-0730]	28	VOC Content	Table F 340-242-0720

21. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, from any categorically insignificant or aggregate insignificant source. Visible emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0110]
22. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than thirty (30) seconds in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, from any single non-fuel burning categorically insignificant or aggregate insignificant source. Visible emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0600]
This condition is only enforceable by the State.
23. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grains per dry standard cubic foot, corrected to 12% CO₂ or 50% excess air, from any fuel burning, categorically insignificant or aggregate insignificant source. Particulate emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0610 and OAR 340-228-0210]
24. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grains per dry standard cubic foot from any non-fugitive categorically insignificant or aggregate insignificant source other than fuel burning and refuse burning equipment. Particulate emissions shall be measured using the test methods identified in condition 47. [OAR 340-226-0210]

25. The permittee shall not cause or permit the emission of sulfur dioxide (SO₂) in excess of 1000 ppm from any categorically insignificant or aggregate insignificant source. Sulfur dioxide emissions shall be measured using the test methods identified in condition 47. [OAR 340-208-0630]
This condition is only enforceable by the State.
26. The permittee shall not use any ASTM Grade 1 distillate fuel oil containing more than 0.3 percent sulfur by weight. Fuel oil sulfur content shall be measured in accordance with condition 47. [OAR 340-228-0110(1)]
27. The permittee shall not use any ASTM Grade 2 distillate fuel oil containing more than 0.5 percent sulfur by weight. Fuel oil sulfur content shall be measured in accordance with condition 47. [OAR 340-228-0110(2)]
28. The permittee shall not knowingly use or contract for the use of any spray paint (as defined in OAR 340-242-0710) exceeding the VOC contents in Table F, OAR 340-242-0720, and manufactured after July 1, 1996, except for spray paint manufactured under a compliance extension, which has been granted under OAR 340-242-0770. The permittee shall not knowingly use any non-complying spray paint manufactured after July 1, 1996 in a manner inconsistent with the coating category for which the product is formulated or recommended. The VOC content of spray paint shall be determined in accordance with OAR 340-242-0750. [OAR 340-242-0730]

PLANT SITE EMISSION LIMITS (PSEL)

29. The 12-month rolling basis plant site emissions shall not exceed the following: [OAR 340-222-0020]

Emissions Unit ID number	PM	PM ₁₀	SO ₂	NO _x	CO	VOC	Monitoring Condition
FACILITY TOTALS	148 tons/12 mo	112 tons/12 mo	----	39 tons/12 mo	----	460 tons/12 mo	45

Note:

PSELs include 1 ton per year for Aggregate Insignificant Activities.

The NO_x PSEL has been set at the Generic level. [OAR 340-222-0041(1)]

30. If NO_x emissions exceed 3.9 tons based on a rolling 12-month basis, then emissions fees shall be based on the entire PSEL for the pollutant, as stated in the table above.

MONITORING REQUIREMENTS

31. The monitoring below must be performed for the respective emission unit if the emission unit is operated during any part of the monitoring period. When an emission unit is not operated during a monitoring period, the monitoring is not required.

FACILITY WIDE MONITORING REQUIREMENTS

32. The permittee shall conduct monitoring pertaining to condition 4 (particulate fallout size standard) and condition 5 (odor nuisance rule) by maintaining a log recording all written complaints, or complaints received via telephone or in person by the responsible official or a designated appointee, that specifically refer to a complaint of odor or particulate fallout nuisance conditions caused by this facility. Said log shall also record the permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the nuisance problem, if possible, within two working days, but no later than 10 working days of receiving the complaint. This condition is only enforceable by the State.
33. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
34. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]

MONITORING REQUIREMENTS FOR FUGITIVE PARTICULATE SOURCES and EU IDs 2-BLF, 3-TC, 5-WLD and 8-OSPRYM:

35. The permittee shall perform and maintain monthly records of inspection and maintenance for monitoring for condition 6 (fugitive particulate controls), condition 9 (Opacity less than 20%, 30 second average), and condition 10 (Opacity less than 20%, 3 minute average)
 - 35.a. One time per calendar month of plant operation the permittee shall visually survey the facility, including, but not limited to the specific areas listed below, for sources of excessive fugitive emissions, using EPA method 22. The survey shall be for a minimum period of thirty (30) minutes. For purposes of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundary. For individual sources or areas, EPA method 22 shall be used for a minimum of one (1) minute. The person performing the survey does not have to be Method 9 Certified, but must be familiar with the procedures of EPA Method 9 including the proper location to observe visible emissions.
 - 35.a.i. Emissions unit 2-BLF, fugitives from blasting areas (when in use).
 - 35.a.ii. Emissions unit 3-TC, Metal cutting areas.
 - 35.a.iii. Emissions unit 5-WLD, welding areas.
 - 35.a.iv. Emissions unit 8-OSPRYM, outdoor painting overspray (when in use).
 - 35.b. If visible emissions are observed leaving the plant site boundary, the permittee shall take corrective action to minimize emissions, and shall record in a maintenance log, any preventative or corrective action taken as a result of the weekly inspections. In addition, after the corrective or preventative action has been performed but within three (3) calendar days of the initial observation, the permittee shall observe visible emissions from the source for a minimum period of 6 minutes. If visible emissions are observed for more than 20 seconds total, the permittee shall measure the opacity of the emissions using Modified Method 9.
 - 35.c. Survey records shall indicate the dates and times of any visible emissions observed during the survey, recorded on inspection forms.
 - 35.d. If the observer is unable to conduct the survey and/or Modified Method 9 tests due to visual interferences caused by other visible emissions sources (e.g. fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer

shall note such conditions on the data observation sheet and make at least three attempts to conduct the surveys and/or tests at approximately two (2) hour intervals. If no observations are made for that day, the observer shall continue to attempt to conduct the survey and/or Modified Method 9 daily until a valid observation is completed.

36. The permittee shall conduct monitoring pertaining to condition 7 by recording actions taken in response to an Air Pollution Alert, Warning, or Emergency Episode.

MONITORING REQUIREMENTS FOR EU IDs 2-BLB123 and 2-BLB45:

37. The permittee shall assure compliance with condition 9 (opacity less than 20%, 30-second average), condition 10 (opacity less than 20%, 3-minute average), particulate emissions limitation conditions 11 (for EU ID 2-BLB123) and 12 (for EU ID 2-BLB45), and condition 16 (inspection and maintenance requirements) as follows:

At least one time each calendar month of operation, the control devices BGHS1, BGHS2, BGHS3, BGHS4, and BGHS5 shall be inspected for physical degradation that could affect the performance of the control device, including but not limited to any individual bags that are found to be blinded, missing or damaged to the extent that they are no longer effective. The permittee shall make all necessary repairs to the baghouses to ensure efficient and effective operation. The permittee shall record in a log the results of the inspections and repairs and maintenance performed.

38. The permittee shall conduct monitoring pertaining to condition (CAM condition follows condition 12) as follows:
- 38.a. Continuously record the pressure drop across EU ID 2-BLB45;
 - 38.b. Take a visual reading of the pressure drop at least once per day and recording the readings in a log; and
 - 38.c. Record all maintenance actions taken as a result of pressure drop readings outside the specified range.

MONITORING REQUIREMENTS FOR 4-NG:

39. The permittee shall conduct monitoring pertaining to condition 10 (Opacity less than 20%), condition 14 (particulate emissions less than 0.27 lb/MMBtu) and condition 15 (grain loading less than 0.1 gr/dscf) as follows:
The permittee shall burn only natural gas in the devices included in EU ID 4-NG and shall monitor all fuel used in the devices in accordance with the requirements of condition 45.

RACT MONITORING REQUIREMENTS FOR 6-COAT:

40. The permittee shall conduct compliance assurance monitoring for condition 17 (RACT) as follows:

- 40.a. On days when each coating used individually meets the RACT limits in condition 17 the permittee shall maintain a current list of all coatings used for EU ID 6-COAT including but not limited to the following information for each coating:

Coating List

- Coating Name and Identification
- Base, coating catalyst, and reducer used, excluding tints;
- Mix Ratio of base and catalyst used, excluding tints;
- VOC content of coating as applied, excluding water
- Drying oven temperature (if applicable)

- 40.b. On days when any coating used for EU ID 6-COAT exceeds the RACT limits in condition 17, the permittee shall maintain a log of all coatings used for EU ID 6-COAT including, but not limited to the following information:

Coating Log

- The name, RACT type, and quantity of each coating used, in gallons.
- The VOC content of each coating as applied, in lbs-VOC/gallon, excluding water and exempt compounds.
- RACT type means CC, FA, EP, or OC, as described below.

- 40.b.i. The permittee shall use the VOC content supplied by the manufacturer on the MSDS Sheet, Technical Data Sheet or other manufacturer supplied information, for emissions calculations.

RACT Calculation

- 40.b.ii. The permittee shall calculate RACT allowable VOC emissions and Actual VOC emissions using the equations shown below in order to monitor compliance.

Actual VOC emissions = the sum total of VOCs emitted from each coating listed on the coating list. (gallons used × lbs-VOC/per gallon.)

RACT allowable VOC emissions = $(CC \times 4.3) + ((FA + EP) \times 3.5) + (OC \times 3.0)$

Where:

- CC** = Clear Coatings (gallons, excluding water and exempt compounds)
- FA** = Forced Air Dried or Air Dried Coatings (gallons, excluding water and exempt compounds) with a cure temperature of 194°F or less as designated by the manufacturer.
- EP** = Extreme Performance Coatings (gallons, excluding water and exempt compounds)
- OC** = Other Coatings (gallons, excluding water and exempt compounds), including those with a cure temperature higher than 194°F, as designated by the manufacturer.

- 40.c. The permittee shall be in compliance with condition 17 on days when only RACT compliance coatings are used, or on days when Actual VOC emissions do not exceed the RACT allowable VOC emissions.

- 40.d. For purposes of determining compliance with the daily RACT, a day is a 24-hour period. The permittee may choose to start the 24-hour period at any time of day. When the starting time is changed, the permittee shall notify the Department in writing within 7 days.

MACT MONITORING REQUIREMENTS FOR 7-SMCT:

41. Compliance procedures

- 41.a. For each batch of coating that is received by the source, the permittee shall (see Figure 1 of 40 CFR 63.785 for a flow diagram of the compliance procedures):
 - 41.a.i. Determine the coating category and the applicable VOHAP limit as specified in condition 18.a.
 - 41.a.ii. Certify the as-supplied VOC content of the batch of coating. The permittee may use a certification supplied by the manufacturer for the batch, although the permittee retains liability should subsequent testing reveal a violation. If the permittee performs the certification testing, only one of the containers in which the batch of coating was received is required to be tested.
 - 41.a.iii. In lieu of testing each batch of coating, as applied, the permittee may determine compliance with the VOHAP limits using any combination of the procedures described in conditions 41.b.i, 41.b.ii, 41.b.iii, and 41.b.iv. The procedure used for each coating shall be determined and documented prior to application.
 - 41.a.iv. The results of any compliance demonstration conducted by the source or any regulatory agency using Method 24 shall take precedence over the results using the procedures in conditions 41.b.i, 41.b.ii, or 41.b.iii.
 - 41.a.v. The results of any compliance demonstration conducted by the source or any regulatory agency using a test method to determine VOHAP content which has been approved in accordance with condition 50.b, shall take precedence over the results determined using the procedures in condition 41.b.iv.

41.b. Coating Compliance Procedures

- 41.b.i. Coatings to which thinning solvent will not be added. For coatings to which thinning solvent (or any other material) will not be added under any circumstance or to which only water is added, the permittee shall comply as follows:
1. Certify the as-applied VOC content of each batch of coating.
 2. Notify the persons responsible for applying the coating that no thinning solvent may be added to the coating by affixing a label to each container of coating in the batch or through another means described in the implementation plan required in 40 CFR 63.787(b).
 3. If the certified as-applied VOC content of each batch of coating used during a calendar month is less than or equal to the applicable VOHAP limit in condition 18.a (either in terms of g/L of coating or g/L of solids), then compliance is demonstrated for that calendar month, unless a violation is revealed using Method 24.
- 41.b.ii. Coatings to which thinning solvent will be added--coating-by-coating compliance. For a coating to which thinning solvent is routinely or sometimes added, the permittee shall comply as follows:
1. Prior to the first application of each batch, designate a single thinner for the coating and calculate the maximum allowable thinning ratio (or ratios, if the source complies with the cold-weather limits in addition to the other limits specified in Table A, condition 18) for each batch as follows:

$$R = \frac{(V_s)(VOHAP\ limit) - m_{VOC}}{D_{th}} \quad \text{Equation 3}$$

Where:

R	=	Maximum allowable thinning ratio for a given batch (L thinner/L coating as supplied);
V _s	=	Volume fraction of solids in the batch as supplied (L solids/L coating as supplied);
VOHAP limit	=	Maximum allowable as-applied VOHAP content of the coating (g VOHAP/L solids);
m _{VOC}	=	VOC content of the batch as supplied [g VOC (including cure volatiles and exempt compounds on the HAP list)/L coating (including water and exempt compounds) as supplied];
D _{th}	=	Density of the thinner (g/L).

If V_s is not supplied directly by the coating manufacturer, the permittee shall determine V_s as follows:

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}} \quad \text{Equation 4}$$

Where:

m _{volatiles}	=	Total volatiles in the batch, including VOC, water, and exempt compounds (g/L coating); and
D _{avg}	=	Average density of volatiles in the batch (g/L).

The procedures specified in condition 50 may be used to determine the values of variables defined in this paragraph. In addition, the permittee may choose to construct nomographs, based on Equation 3, similar or identical to the one provided in Appendix B of 40 CFR Part 63 Subpart II as a means of easily estimating the maximum allowable thinning ratio.

2. Prior to the first application of each batch, notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch of the coating by affixing a label to each container of coating or through another means described in the implementation plan.
3. By the 15th day of each calendar month, determine the volume of each batch of the coating used, as supplied, during the previous month.
4. By the 15th day of each calendar month, determine the total allowable volume of thinner for the coating used during the previous month as follows:

$$V_{th} = \sum_{i=1}^n (R \times V_b)_i + \sum_{i=1}^n (R_{cold} \times V_{b-cold})_i \quad \text{Equation 5}$$

Where:

V_{th}	=	Total allowable volume of thinner for the previous month (L thinner);
V_b	=	Volume of each batch, as supplied and before being thinned, used during non-cold-weather days of the previous month (L coating as supplied);
R_{cold}	=	Maximum allowable thinning ratio for each batch used during cold-weather days (L thinner/L coating as supplied);
V_{b-cold}	=	Volume of each batch, as supplied and before being thinned, used during cold-weather days of the previous month (L coating as supplied);
i	=	Each batch of coating; and
n	=	Total number of batches of the coating.

5. By the 15th day of each calendar month, determine the volume of thinner actually used with the coating during the previous month.
6. If the volume of thinner actually used with the coating [condition 41.b.ii.(41.b.iii.5)] is less than or equal to the total allowable volume of thinner for the coating [condition 41.b.ii.(4)], then compliance is demonstrated for the coating for the previous month, unless a violation is revealed using Method 24.

41.b.iii. Coatings to which the same thinning solvent will be added--group compliance. For coatings to which the same thinning solvent (or other material) is routinely or sometimes added, the permittee shall comply as follows:

1. Designate a single thinner to be added to each coating during the month and "group" coatings according to their designated thinner.
2. Prior to the first application of each batch, calculate the maximum allowable thinning ratio (or ratios, if the source complies with the cold-weather limits in addition to the other limits specified in Table A) for each batch of coating in the group using the equations in condition 41.b.ii.

3. Prior to the first application of each "batch," notify painters and other persons, as necessary, of the designated thinner and maximum allowable thinning ratio(s) for each batch in the group by affixing a label to each container of coating or through another means described in the implementation plan.
 4. By the 15th day of each calendar month, determine the volume of each batch of the group used, as supplied, during the previous month.
 5. By the 15th day of each calendar month, determine the total allowable volume of thinner for the group for the previous month using Equation 5.
 6. By the 15th day of each calendar month, determine the volume of thinner actually used with the group during the previous month.
 7. If the volume of thinner actually used with the group [condition 41.b.iii.6)] is less than or equal to the total allowable volume of thinner for the group [condition 41.b.iii.(0)], then compliance is demonstrated for the group for the previous month, unless a violation is revealed using Method 24.
- 41.b.iv. Demonstration of compliance through an alternative (i.e., other than Method 24) test method. The permittee shall comply as follows:
1. Certify the as-supplied VOHAP content (g VOHAP/L solids) of each batch of coating.
 2. If no thinning solvent will be added to the coating, the permittee shall follow the procedure described in condition 41.b.i, except that VOHAP content shall be used in lieu of VOC content.
 3. If thinning solvent will be added to the coating, the permittee shall follow the procedure described in condition 41.b.ii or 41.b.iii, except that in Equation 3: the term " m_{VOC} " shall be replaced by the term " m_{VOHAP} ," defined as the VOHAP content of the coating as supplied (g VOHAP/L coating) and the term " D_{th} " shall be replaced by the term " $D_{th(VOHAP)}$ " defined as the average density of the VOHAP thinner(s) (g/L).
- 41.c. A violation revealed through any approved test method shall result in a 1-day violation for enforcement purposes. A violation revealed through the recordkeeping procedures described in conditions 41.b.i through 41.b.iv shall result in a 30-day violation for enforcement purposes, unless the permittee provides sufficient data to demonstrate the specific days during which noncompliant coatings were applied.

MONITORING REQUIREMENTS FOR 8-OSPRY:

42. The permittee shall assure compliance with condition 9 (opacity less than 20%, 30-second average), condition 10 (opacity less than 20%, 3-minute average), condition 12 (particulate emissions limitations), and condition 16 (inspection and maintenance requirements) as follows:
At least one time each calendar month of operation, the spray booths shall be inspected for physical degradation that could affect their performance as particulate control devices. The permittee shall make all necessary repairs to the spray booths to ensure efficient and effective operation.

NESHAP MONITORING REQUIREMENTS FOR 10-SCMP: [40 CFR Part 63 Subpart M]]

43. The permittee shall demonstrate compliance by not using any coatings for which the organic HAP content as determined by using Equation 2 set out in condition 19.h exceeds the limit in condition 19.b, and use no thinner and/or other additive, or cleaning material that contains organic HAP as determined in 19.e based on a 12-month period.
44. The use of any coating, thinner and/or other additive, or cleaning material that does meet the criteria set out in condition 19.e is considered a deviation and must be reported as such and as outlined in condition 60.

MONITORING REQUIREMENTS FOR THE PLANT SITE EMISSION LIMITS:

45. The permittee shall determine compliance with the Plant Site Emission Limits established in condition 29 of this permit by conducting monitoring in accordance with the following procedures, test methods, and frequencies:
- 45.a. The permittee shall monitor and record the following process parameters on a monthly basis:

Emissions Unit	Process Parameter	Units
2-BLB123	Baghouse 1 operating hours	hours
	Baghouse 2 & 3 operating hours	hours
2-BL45	Baghouse 4 and 5 blasting hours *	hours
2-BLF	Blast media used **	tons
3-TC	Wet plasma cutting, estimated minutes	minutes
	Dry plasma cutting, estimated minutes	minutes
	Oxy-fuel cutting, estimated minutes	minutes
4-NG	Natural gas used	cubic feet
5-WLD	All welding rod used	lbs
8-OSPRY	Paint solids used for spray booth use	lbs
8-OSPRYM	Paint solids used outside of spray booths	lbs

* Baghouse 4 and 5 blasting hours shall be calculated using the following equation:

$$BH45 = (40 \times BX + 50 \times ST + 50 \times OC) / 60$$

Where;

BH45 = baghouse 4 blasting hours
 BX = number of boxcars produced during a month
 ST = number of stack cars produced during a month
 OC = number of other cars produced during a month

** BLF blast media used includes all blast media used outside of the blasting booths.

- 45.b. The permittee shall use fuel use records supplied by their natural gas supplier for PSEL compliance. For PSEL compliance purposes the fuel meter may include natural gas used for other insignificant emissions activities as well as the EU ID 4-NG. The PSEL applies to the total quantity of fuel metered.

- 45.c. The permittee shall determine paint solids used for EU IDs 8-OSPRY and 8-OSPRYM on a mass balance basis, where paint solids is equal to the total weight of solids contained in coating materials used.
- 45.d. For the purposes of determining compliance with the PSELs the permittee shall calculate the daily emissions on the next working day, and monthly emissions within 30 days of the end of each calendar month. For emission units other than 9-VOC, the permittee shall use the following formula, the process parameter measurements identified in the table above, and the emission factors listed in the table below.

$$E = \Sigma(P_{eu} \times EF_{eu}) \times k$$

Where:

- E = pollutant emissions - lbs/hr or tons/yr
 P_{eu} = process parameter identified in table above.
 EF_{eu} = emission factor identified for each emissions unit and pollutant in table below.
k = conversion constant, 1 lb/lb or 1 ton/2000lbs.

- 45.e. Emissions factors for calculating pollutant emissions:

Emissions Unit	Process Parameter	Pollutant	Emission Factor	Annual Emission Factor	Units
2-BLB123	Baghouse #3 operating hours	PM/PM ₁₀	0.52	0.52	lbs/hr
	Baghouse #1 and #2 operating hours (total)	PM/PM ₁₀	3.7	3.7	lbs/hr
2-BL45	Baghouse #4 & #5 blasting hrs	PM/PM ₁₀	0.45	0.45	lbs/hr
2-BLF	Shot blast media used	PM	63	63	Lbs/klb
		PM ₁₀	18	18	Lbs/klb
3-TC	Wet plasma cutting, minutes	PM/PM ₁₀	0.0002	0.0001	Lb/minutes
		NO _x	0.001	0.001	Lb/minutes
	Dry plasma cutting, minutes	PM/PM ₁₀	0.013	0.013	Lb/minutes
		NO _x	0.005	0.005	Lb/minutes
	Oxy-fuel cutting, minutes	PM/PM ₁₀	0.006	0.006	Lb/minutes
		NO _x	0.002	0.002	Lb/minutes
4-NG	Natural gas used	NO _x	100	100	Lb/MMCF
5-WLD	welding rod used	PM/PM ₁₀	12.8	12.8	Lbs/klb
8-OSPRY	Rail paint solids used	PM/PM ₁₀	0.0175	0.0175	Lbs/lb
8-OSPRYM	Marine paint solids used	PM	0.325	0.325	Lbs/lb
		PM ₁₀	0.163	0.163	Lbs/lb

The emissions factors listed above are not enforceable limits. Compliance with PSELs shall only be determined by the calculations contained in condition 45 of this permit using the monitored parameters recorded during the reporting period and the emission factors contained in the table above.

- 45.f. On a daily basis the permittee will calculate and record the following for all activities not categorically insignificant or aggregate insignificant;
- 45.f.i. The name and quantity of each VOC containing material used, in gallons or lbs.
- 45.f.ii. The VOC content of each VOC material in lbs/gal or lbs/lb, (excluding exempt compounds, based on MSDS's, Technical Data Sheets or other approved information source). This VOC content will be used in the equations below.

- 45.g. Daily emissions from **9-VOC** shall be calculated on a mass balance basis as follows:

$$\mathbf{VOC} = \Sigma (Q_{\text{MAT}} \times \text{VOC}_{\text{MAT}})$$

Where;

VOC = daily VOC emissions.

Q_{MAT} = quantity of material used for a day (gallons or pounds)

VOC_{MAT} = VOC content of material used (lbs/gal or lbs/lb, excluding exempt compounds)

- 45.h. The permittee shall determine compliance with condition 29 (12-month rolling PSELs) for by summing the emissions for each emissions unit except for EU ID 9-VOC for each day or month of the year as indicated, and adding the Aggregate Insignificant emissions by pollutant. Annual emissions from EU ID 9-VOC will be determined in accordance with the procedure below. Compliance shall be determined by comparing the resulting totals to the Plant Site Emission Limits listed in condition 29.

- 45.i. Annual emissions from **9-VOC** shall be calculated on a mass balance basis as follows:

$$\mathbf{VOC} = \text{VOC}_{\text{in}} - \text{VOC}_{\text{waste}}$$

Where;

VOC = VOC emissions.

VOC_{in} = total weight of VOC in materials used (excluding exempt compounds)

$\text{VOC}_{\text{waste}}$ = $m_{\text{dis}} * \% \text{VOC}_{\text{dis}}$

Where;

m_{dis} = weight of VOC containing waste shipped off site

$\% \text{VOC}_{\text{dis}}$ = VOC content of waste (lb per lb, excluding exempt compounds)

TEST METHODS AND PROCEDURES

[OAR 340-212-0120]

GENERAL TESTING REQUIREMENTS

46. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the Department's Source Sampling Manual. [OAR 340-212-0120]
 - 46.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the Department at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for the Department to grant approval and may require EPA approval in addition to approval by the Department.
 - 46.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
 - 46.c. Unless otherwise specified by permit condition or Department approved source test plan, all compliance source tests must be performed as follows:
 - 46.c.i. At least 90% of the design capacity for new or modified equipment;
 - 46.c.ii. At least 90% of the maximum operating rate for existing equipment; or
 - 46.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
 - 46.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, the Department may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
 - 46.e. Source test reports prepared in accordance with the Department's Source Sampling Manual must be submitted to the Department within 45 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

47. If source testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods and averaging times to measure the pollutant emissions for the applicable requirements referenced in the table below: [OAR 340-218-0050]

Applicable Requirement Condition	Test Method	Averaging time	Special conditions:
9, 10, 21, and 22	Modified EPA Method 9 in accordance with the Department's Source Sampling Manual	For condition 9, aggregate of 30 seconds in any 60 minute period. For 10, 21, and 22, aggregate of three minutes in any 60 minute period	Each Method 9 observation shall represent a period of 15 seconds for the purpose of determining the aggregate amount of time in a 60 minute period that the visible emissions are greater than the opacity limit. The test duration may be less than 60 minutes if a violation of the standard is documented before the full 60 minute observation period is completed
11, 14, 15, 23 and 24	ODEQ Methods 5, 7, or 8	Average of three test runs	ODEQ Method 8 is for sources with exhaust gases at essentially ambient conditions (e.g. material handling cyclones); ODEQ Method 7 is for direct contact combustion sources (e.g. particle and veneer dryers); ODEQ Method 5 is for indirect contact fuel burning equipment (e.g. boilers) and any other source.
25	EPA Method 6 or 6c	Average of three one-hour test runs	None
26, 27	ASTM D3177-75, or D4239-85	Per batch of oil received	Samples shall be collected in accordance with ASTM D2243

48. All testing shall be conducted in accordance with the Department's Source Sampling Manual unless otherwise specified elsewhere in this permit or unless otherwise approved in writing by the Department.

Test methods for EU ID 6-COAT:

49. While testing is not required for monitoring for condition 17, the results of any compliance demonstration performed by the permittee or any regulatory agency shall using testing in accordance with 40 CFR Part 60 EPA Method 18, or 24, or an equivalent plant specific method approved by and on file with the Department, shall take precedence over the results using the material balance method in condition 40. Exempt compounds are not included in the RACT compliance calculation. [OAR 340-218-0050]

Test methods for EU ID 7-SMCT:

50. The following test methods and procedures shall be used to determine compliance with the MACT requirements in condition 18;
- 50.a. For the compliance procedures described in conditions 41.b.i through 41.b.iii, Method 24 of 40 CFR Part 60, appendix A, is the definitive method for determining the VOC content of coatings, as supplied or as applied. When a coating or thinner contains exempt compounds that are volatile HAP or VOHAP, the permittee shall ensure, when determining the VOC content of a coating, that the mass of these exempt compounds is included.
 - 50.b. For the compliance procedure described in condition 41.b.iv, the test method for determining the VOHAP content of coatings and thinners must be approved by the Administrator of the EPA and the Department, in accordance with the requirements of 40 CFR 63.786.
 - 50.c. A coating manufacturer or the permittee may use batch formulation data as a test method in lieu of Method 24 to certify the as-supplied VOC content of a coating if the manufacturer or the permittee has determined that batch formulation data have a consistent and quantitatively known relationship to Method 24 results. This determination shall consider the role of cure volatiles, which may cause emissions to exceed an amount based solely upon coating formulation data. Notwithstanding such determination, in the event of conflicting results, Method 24 shall take precedence.
 - 50.d. The permittee shall use or ensure that the manufacturer uses the form and procedures mentioned in 40 CFR 63 Subpart II, appendix A to determine values for the thinner and coating parameters used in Equations 3 and 4. The permittee shall ensure that the coating/thinner manufacturer (or supplier) provides information on the VOC and VOHAP contents of the coatings/thinners and the procedure(s) used to determine these values.

RECORDKEEPING REQUIREMENTS

[OAR 340-218-0050(3)(a) and (b)]

51. The permittee shall maintain the following general records of required monitoring information:
- 51.a. The date, place as defined in the permit, and time of sampling or measurements;
 - 51.b. The date(s) analyses were performed;
 - 51.c. The company or entity that performed the analyses;
 - 51.d. The analytical techniques or methods used;
 - 51.e. The results of such analyses;
 - 51.f. The operating conditions as existing at the time of sampling or measurement; and
 - 51.g. Actions taken in response an Air Pollution Alert, Warning, or Emergency Episode
52. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [OAR 340-214-0110, 340-212-0160, and 340-218-0050(3)(b)]

53. The permittee shall maintain the following specific records of required monitoring information:
- 53.a. Monthly and annual records of railcar and barge production;
 - 53.b. Monthly and annual records of railcars refurbished;
 - 53.c. The complaint log, as required by condition 32;
 - 53.d. Records of monthly visible emission surveys and resulting actions as required by condition 35;
 - 53.e. Records of actions taken in response to an Air Pollution Episode as required by condition 36;
 - 53.f. Records of monthly inspection and maintenance as required by condition 37;
 - 53.g. Records of continuous pressure drop readings for EU ID 2-BLB45 as required by condition 38;
 - 53.h. Daily records of visual pressure drop readings for EU ID 2-BLB45 as required by condition 38;
 - 53.i. Records of maintenance actions on EU ID 2-BLB45 taken as a result of pressure drop readings outside the specified range, as required by condition 38;
 - 53.j. Monthly records of Miscellaneous VOC use;
 - 53.k. Monthly and annual plant-wide VOC-R and VOC-M emissions;
 - 53.l. Annual non-VOC HAPs emitted;
 - 53.m. Monthly and annual quantities of VOCs contained in waste disposed off site.
54. Monthly records shall be available for inspection on or before the 30th calendar day following the last day of each calendar month.
55. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [OAR 340-218-0050(b)(B)]

MACT RECORDKEEPING REQUIREMENTS FOR 7-SMCT:

56. The permittee shall maintain the following relevant records:
- 56.a. All documentation supporting the initial notification.
 - 56.b. The permittee shall record the total volume of coatings, as described in condition 18.c.i, applied at the source to ships. Such records shall be compiled monthly.
 - 56.c. The permittee shall compile records on a monthly basis. At a minimum, these records shall include:
 - 56.c.i. All documentation supporting the initial notification.
 - 56.c.ii. A copy of the source's approved implementation plan;
 - 56.c.iii. The volume of each low-usage-exempt coating applied;
 - 56.c.iv. Identification of the coatings used, their appropriate coating categories, and the applicable VOHAP limit;
 - 56.c.v. Certification of the as-supplied VOC content of each batch of coating;
 - 56.c.vi. A determination of whether containers meet the standards as described in condition 18.b.ii; and
 - 56.c.vii. The results of any Method 24 or approved VOHAP measurement test conducted on individual containers of coating, as applied.

- 56.d. The records required by condition 56.c shall include additional information, as determined by the compliance procedure(s) described in condition 41.b that the source followed:
- 56.d.i. Coatings to which thinning solvent will not be added. The records maintained if demonstrating compliance using the procedure described in condition 41.b.i shall contain the following information:
1. Certification of the as-applied VOC content of each batch of coating; and
 2. The volume of each coating applied.
- 56.d.ii. Coatings to which thinning solvent will be added - coating-by-coating compliance. The records maintained by facilities demonstrating compliance using the procedure described in condition 41.b.ii shall contain the following information:
1. The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids (nonvolatiles) in each batch, including any calculations;
 2. The maximum allowable thinning ratio (or ratios, if the source complies with the cold-weather limits in addition to the other limits specified in Table A for each batch of coating, including calculations;
 3. If the source chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch of the coating, as supplied, during these dates;
 4. The volume used of each batch of the coating, as supplied;
 5. The total allowable volume of thinner for each coating, including calculations; and
 6. The actual volume of thinner used for each coating.
- 56.d.iii. Coatings to which the same thinning solvent will be added--group compliance. The records maintained by facilities demonstrating compliance using the procedure described in condition 41.b.iii shall contain the following information:
1. The density and mass fraction of water and exempt compounds of each thinner and the volume fraction of solids in each batch, including any calculations;
 2. The maximum allowable thinning ratio (or ratios, if the affected source complies with the cold-weather limits in addition to the other limits specified in Table A) for each batch of coating, including calculations;
 3. If the source chooses to comply with the cold-weather limits, the dates and times during which the ambient temperature at the affected source was below 4.5°C (40°F) at the time the coating was applied and the volume used of each batch in the group, as supplied, during these dates;
 4. Identification of each group of coatings and their designated thinners;
 5. The volume used of each batch of coating in the group, as supplied;
 6. The total allowable volume of thinner for the group, including calculations; and
 7. The actual volume of thinner used for the group.

- 56.d.iv. Demonstration of compliance through an alternative (i.e., non-Method 24) test method. The records maintained by facilities demonstrating compliance using the procedure described in condition 41.b.iv shall contain the following information:
1. Identification of the Administrator-approved VOHAP test method or certification procedure;
 2. For coatings to which the source does not add thinning solvents, the source shall record the certification of the as-supplied and as-applied VOHAP content of each batch and the volume of each coating applied;
 3. For coatings to which the source adds thinning solvent on a coating-by-coating basis, the source shall record all of the information required to be recorded by condition 56.d.ii; and
 4. For coatings to which the source adds thinning solvent on a group basis, the source shall record all of the information required to be recorded by condition 56.d.iii.
- 56.e. If the permittee detects a violation of the standards specified in condition 18, the permittee shall, for the remainder of the reporting period during which the violation(s) occurred, include the following information in his or her records:
- 56.e.i. A summary of the number and duration of deviations during the reporting period, classified by reason, including known causes for which a Federally-approved or promulgated exemption from an emission limitation or standard may apply.
- 56.e.ii. Identification of the data availability achieved during the reporting period, including a summary of the number and total duration of incidents that the monitoring protocol failed to perform in accordance with the design of the protocol or produced data that did not meet minimum data accuracy and precision requirements, classified by reason.
- 56.e.iii. Identification of the compliance status as of the last day of the reporting period and whether compliance was continuous or intermittent during the reporting period.
- 56.e.iv. If, pursuant to condition 56.e.iii, the permittee identifies any deviation as resulting from a known cause for which no Federally-approved or promulgated exemption from an emission limitation or standard applies, the monitoring report shall also include all records that the source is required to maintain that pertain to the periods during which such deviation occurred and:
1. The magnitude of each deviation;
 2. The reason for each deviation;
 3. A description of the corrective action taken for each deviation, including action taken to minimize each deviation and action taken to prevent recurrence; and
 4. All quality assurance activities performed on any element of the monitoring protocol.

NESHAP RECORDKEEPING REQUIREMENTS FOR 10-SCMP: [40 CFR Part 63 Subpart MMMM]

57. The permittee shall maintain the following records for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee shall maintain the records on site for two (2) years in such a manner that they may be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1): [40 CFR 63.3931(a) through (c) and 40 CFR 63.3930 (a) through (f) and (k)]
- 57.a. A copy of each notification and report submitted pertaining to compliance with 40 CFR 63 Subpart MMMM.
 - 57.b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction or organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating.
 - 57.c. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the test report.
 - 57.d. If manufacturer information used was based on testing, the permittee must keep a copy of the summary sheet of results provided by the manufacturer.
58. The permittee must keep the following records for each compliance period: [40 CFR 63.3930(c)]
- 58.a. A record of each coating operation, time period, and the compliance option used for each operation used.
 - 58.b. A record of the calculation of the organic HAP content for each coating as calculated using Equation 2 in condition 19.h.
 - 58.c. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. Purchase records may be maintained for each material used rather than a record of the volume used.
 - 58.d. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each 12-month period unless the material is tracked by weight.
 - 58.e. A record of the volume fraction of coating solids for each coating used during each 12-month period.
 - 58.f. Records of the date, time, and duration of each deviation.

REPORTING REQUIREMENTS

59. Excess Emissions Reporting: The permittee must report all excess emissions in accordance with OAR 340-214-0300 through 340-214-0360. In summary, the permittee must immediately (i.e., as soon as possible but in no case more than one hour after a source knew or should have known of an excess emission period) notify the Department by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance. Notification must, to the extent reasonably ascertainable at the time of notification, include the source name, nature of the emissions problem, name of the person making the report, name and telephone number of the contact person for further information, date and time of the onset of the upset condition, whether or not the incident was planned, the cause of the excess emission (e.g., startup, shutdown, maintenance, breakdown, or other), equipment involved in the upset, estimated type and quantity of excess emissions, estimated time of return to normal operations, efforts made to minimize emissions, and a description of remedial actions to be taken. Follow-up reporting must be made in accordance with Department direction, OAR 340-214-0330(2) and 340-214-0340.
- 59.a. 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 the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
- 59.b. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to the Department for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by the Department 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.
- 59.c. The permittee must notify the Department of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if the source is located in a nonattainment area for a pollutant which may be emitted in excess of applicable standards.
- 59.d. The permittee must maintain and submit to the Department a log of planned and unplanned excess emissions, on Department approved forms, in accordance with OAR 340-214-0340.
- 59.e. Notwithstanding the immediate reporting requirement specified above, the permittee may make initial reports of excess emissions as soon as possible but in no case later than the end of the first working day following the excess emissions period. [OAR 340-214-0330(2)(a)].
60. Permit Deviation Reporting. The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within seven (7) days of the deviation. Deviations that cause excess emissions, as specified in OAR 340-214-0300 through 340-214-0360 must be reported in accordance with OAR 340-214-0340. [OAR 340-218-0050(3)(c)(B)]
61. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5);[OAR 340-218-0050(3)(c)(D)]

Semi-annual and Annual Reports

62. The permittee must submit four (4) copies of the semiannual reports of any required monitoring at least every 6 months, completed on forms approved by the Department. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the Air Quality Division, two copies to the regional office, and one copy to the EPA. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
 - 62.a. The first semiannual report is due on July 30 and consists of the semi-annual compliance certification; OAR 340-218-0080.
 - 62.b. The second semiannual report is due on February 15 and consists of the semi-annual compliance certification; OAR 340-218-0080.
63. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
 - 63.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 63.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable conditions that are not yet in the permit. When certifying compliance with new applicable conditions that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
 - 63.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition 63.b. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred; and
 - 63.d. Such other facts as the Department may require in order to determine the compliance status of the source.
 - 63.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

64. The permittee must submit four (4) copies of the annual monitoring report, on Department approved forms, by February 15, unless otherwise approved in writing by the Department. One copy of the report must be submitted to the Air Quality Division, two copies to the regional office, and one copy to the EPA. All instances of deviations from permit requirements must be clearly identified in such reports. The annual monitoring report shall consist of the following: [OAR 340-218-0050(3)(c)(A)]
- 64.a. The NO_x and VOC emission statement [OAR 340-214-0220];
 - 64.b. Specific annual reporting requirements;
 - 64.c. The annual process parameters listed in conditions 45.a and 45.h;
 - 64.d. A copy of the complaint log;
 - 64.e. Plant-wide rolling 12-month VOC, PM, and PM₁₀ emissions for each month of the reporting year;
 - 64.f. Highest daily production for each month;
 - 64.g. Annual production and monthly production;
 - 64.h. Miscellaneous VOC materials used monthly, recorded on Department approved forms;
 - 64.i. Monthly non-VOC HAP use;
 - 64.j. Quantities and types of fuel used on an annual basis;
 - 64.k. The emission fee report;
 - 64.l. The excess emissions upset log, OAR 340-0214-0340; and,
 - 64.m. The second semi-annual compliance certification as set out in condition 62.b.
65. MACT Reporting and Notification requirements.
- 65.a. Notification requirements. If the permittee has been granted an extension of compliance under Subpart D 40 CFR Part 63, the requirements of this section do not apply to those sources while they are operating under such compliance extensions.
 - 65.a.i. Request for extension of compliance. If the permittee cannot comply with a relevant standard by the applicable compliance date for that source, the permittee may submit to the Department a request for an extension of compliance as specified in 40 CFR 63.6(i)(4) through 63.6(i)(6).
 - 65.a.ii. Change in information already provided. Any change in the information already provided in the Initial Notification or the Implementation Plan required under 40 CFR 63.787 shall be provided to the Administrator of the EPA and the Department in writing within 15 calendar days after the change.
 - 65.b. Reporting requirements. Unless a waiver of reporting requirements under 40 CFR 63.10(f) has been granted, and before the 60th day following completion of each 6-month period after the compliance date specified in condition 18, the permittee shall submit a report to the Administrator of the EPA and the Department for each of the previous 6 months. The report shall include all of the information that must be retained pursuant to conditions 55, 56, 56.c and 56.d except for that information specified in conditions 56, 56.c, 56.c.i, 56.c.ii, 56.c.v, 56.d, 56.d.i. (56.d.i.1), 56.d.ii (56.d.iii), and 56.d.iii (56.d.iii.1). If a violation is detected, the source shall also report the information specified in condition 56 and 56.e for the reporting period during which the violation(s) occurred. To the extent possible, the report shall be organized according to the compliance procedure(s) followed each month by the source.
 - 65.c. Progress reports. If required to submit progress reports as a condition of receiving an extension of compliance under 40 CFR 63.6(i), the permittee shall submit such reports to the Department by the dates specified in the written extension of compliance.

66. NESHAP REPORTING REQUIREMENTS FOR 10-SCMP: [40 CFR Part 63 Subpart MMMM]

- 66.a. The permittee must submit the following compliance report containing the following information semi-annually: [40 CFR 63.3942(c), 63.3910(c)(6) and 63.3920(a)(5)]
 - 66.a.i. Identify the coating operation(s) for which the compliant materials option was used.
 - 66.a.ii. If there was no deviation from the limit set out in condition 19.b, then the permittee shall submit a statement that the coating operation(s) were in compliance with the emission limitations set out in condition 19.b during the reporting period because no coatings, thinners and/or other additives, or cleaning materials were used for which the organic HAP content exceeded the emission limit in condition 19.b.
 - 66.a.iii. The initial compliance period covers the period from January 2, 2007 through January 8, 2008; thus, the first reporting period for compliance with 40 CFR Part 63 Subpart MMMM is July 30, 2008, as specified in condition 62. Each subsequent reporting period for compliance is specified in conditions 62 and 64.

- 66.b. If a deviation occurred during the reporting period, then the permittee must: [40 CFR 63.3920(a)(5) and 63.3910(c)(6)]
 - 66.b.i. Include a description and statement of the cause of the deviation.
 - 66.b.ii. All the calculations used to determine the kg (lb) or organic HAP emitted per liter (gal) coating solids used.
 - 66.b.iii. Identification of each coating used that deviated from the emission limit set out in condition 19.b and each thinner and/or additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
 - 66.b.iv. The calculation of the organic HAP content for each coating under 66.b.iii.
 - 66.b.v. The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material under 66.b.iii.

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

DEQ - Northwest Region
2020 S.W. 4th Avenue, #400
Portland, OR 97201-4987
(503) 229-5263

DEQ - Air Quality Division
811 SW Sixth Avenue
Portland, OR 97204
(503) 229-5359

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

NON-APPLICABLE REQUIREMENTS

68. State and Federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability: [OAR 340-218-0110]

Applicable Requirement	Reason Code
340-022-0104 through 0106	b
340-022-0110 through 0160	b
340-022-0170(a) through 0170(i)	b
340-022-0175 through 0300	b
340-022-0400 through 0403	b
340-022-0460 through 0640	b
340-025-0005 through 0430	b
340-028-2130(4)	b
340-028-2180	b
340-031-0005 through 0130	b
340-032-5510	b
340-032-5530 through 5580	b
340-028-0500 through 0520	b
340-028-0800 through 0820	b
340-028-2170	b
340-032-0250	b
340-032-0530 through 0620	b
40 CFR parts 55, 57, 60 (except subparts A and all Appendices)	b
40 CFR Part 61 (except subparts A, M, and all Appendices)	b
40 CFR Part 63 (except subparts A, sections 63.780-788, and all Appendices)	b
40 CFR Part 72	b
40 CFR Part 73	b
40 CFR Part 75	b
40 CFR Part 76	b
40 CFR Part 77	b
40 CFR Part 78	b
40 CFR Part 82 (except subpart F)	b
40 CFR Part 85 through 89	b
340-021-0200 through 0245	c
340-030-0012 through 0115	c
340-030-0200 through 0230	c
340-030-0600 through 0620	c
340-021-0025	e
340-021-0027	e
340-021-0040 through 340-021-0045	e
Applicable Requirement	Reason Code

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340-022-0055	e
340-022-0405 through 0415	e
340-024-0025	e
340-024-0100 through 0350	e
340-025-0535 through 0805	e
340-025-0850 through 0905	e
340-030-0420	e
340-030-0460	e
340-030-0470	e
340-032-2620 through 3010	e
340-022-0020	f
340-028-0400(2) and (3)	h
340-028-1030	h
340-028-1040	h
340-028-1050	h
340-028-2130(8)	h
340-032-0300 through 0380	h

Reason code definitions:

- b - the facility is not in this source category
- c - the facility is not in a special control/nonattainment area
- e - the facility does not have this emissions unit
- f - the facility does not use this fuel type
- h - this method/procedure is not used by the facility

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in this permit have the meaning assigned to such terms in the referenced regulation.

G2. Reference materials

Where referenced in this permit, the versions of the following materials are effective as of the dates noted unless otherwise specified in this permit:

- a. Source Sampling Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A4;
- b. Continuous Monitoring Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee must comply with all conditions of this permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance is supplemental to, and does not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G4. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400] This condition is enforceable only by the State.

G5. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G6. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to the Department or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to the Department a material error or omission in these records, reports, plans, or other documents.

G7. Open Burning [OAR Chapter 340, Division 264]

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

G8. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G9. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G10. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit is deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. such applicable requirements are included and are specifically identified in the permit, or
 - ii. the Department, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit alters or affects the following:
 - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. the applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
 - iv. the ability of the Department to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by the Department.

G11. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow the Department of Environmental Quality, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. as authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G12. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under section 112(r) of the Federal Clean Air Act. The permittee must submit payment to the Department of Environmental Quality, Business Office, 811 SW 6th Avenue, Portland, OR 97204, within 30 days of the date the Department mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to the Department of Environmental Quality. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G13. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee must monitor for, and record, any off-permit change to the source that:
 - i. is not addressed or prohibited by the permit;
 - ii. is not a Title I modification;
 - iii. is not subject to any requirements under Title IV of the FCAA;
 - iv. meets all applicable requirements;
 - v. does not violate any existing permit term or condition; and
 - vi. may result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to the Department and the EPA.
- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of condition G9 does not extend to off-permit changes.

G14. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
 - i. violate an applicable requirement;
 - ii. contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. be a Title I modification.
- b. A minimum 7-day advance notification must be submitted to the Department and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of condition G9 does not extend to section 502(b)(10) changes.

G15. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- a. legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. sale or exchange of the activity or facility.

G16. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G17. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180

G18. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G19. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from the Department prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

G20. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an air contaminant discharge permit (ACDP) from the Department and having satisfied the requirements of OAR 340, Division 224.

G21. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G22. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must furnish to the Department, within a reasonable time, any information that the Department may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to the Department copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to the Department along with a claim of confidentiality.

G23. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by the Department.
- b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and affect only those parts of the permit for which cause to reopen exists.

G24. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G25. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless the Department requests an earlier submittal. If more than 12 months is required to process a permit renewal application, the Department must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G26. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G27. Property Rights [OAR 340-200-0020 and 340-218-0050(6)(d)]

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

G28. Permit Availability [OAR 340-200-0020 and 340-218-0120(2)]

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

ALL INQUIRIES SHOULD BE DIRECTED TO:

Department of Environmental Quality
Northwest Region
2020 SW 4th Ave., Suite 400
Portland, OR 97201-4987
(503) 229-5263

PH
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September 2006