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:	INFORMATION RELIED UPON:	
Miles Fiberglass and Plastics, Inc. dba Miles Fiberglass and Composites	Application Number:	021225
8855 SE Otty Road Portland, OR 97266	Received:	11/19/04
PLANT SITE LOCATION:	**LAND USE COMPATIBILITY STATEMENT:**	
Miles Fiberglass & Plastics, Inc. 1516 Main St. Bldg. B	Issued by:	Clackamas County
Oregon City, OR 97045	Dated:	10/14/94

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

_____________________________________ _______________________

Cory Ann Wind, Northwest Region Air Quality Manager   Date

Nature of Business: Manufacturing of Fiberglass Products

SIC: 3089

RESPONSIBLE OFFICIAL		FACILITY CONTACT PERSON	
Name:	Lowell Miles	Name:	Lowell Miles
Title:	Owner, CEO	Title:	Owner, CEO
		Phone:	(503) 775-7755

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CPMS	Continuous parameter monitoring system
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission factor
EPA	US Environmental Protection Agency
EU	Emissions Unit
FCAA	Federal Clean Air Act
FSA	Fuel sampling and analysis
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040
HCFC	Halogenated Chloro-Fluoro-Carbons
ID	Identification number or label
I&M	Inspection and maintenance
NA	Not applicable
NO_x	Nitrogen oxides
O2	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
PM_{10}	Particulate matter less than 10 microns in size
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	pounds per square inch, actual
SERP	Source emissions reduction plan
SO_2	Sulfur dioxide
ST	Source test
VE	Visible emissions
VMT	Vehicle miles traveled
VOC	Volatile organic compounds

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 5, 6, 8, 26, G5, and G9, which are only enforceable by the state. [OAR 340-218-0060]

EMISSIONS UNIT (EU)

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

Emissions Unit	EU ID
Facility wide VOC from Resin and Miscellaneous VOC use.	VOC-A

EMISSION LIMITS AND STANDARDS

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

Facility wide Requirements

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirements	
				Monitoring Method	Condition Number
Particulate Size Standard OAR 340-208-0450	5	PM >250μ	N/A	Complaint Log	26
Fugitive Odor Nuisance Conditions OAR 340-208-0300	6	Fugitive Odor	No nuisance	Complaint Log	26

5. The permittee shall not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [OAR 340-208-0450] This condition is enforceable only by the State.

6. 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.

Insignificant Activities Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
340-208-0110	7	Visible emissions	20% opacity, 3 min. in 60 min.
340-208-0600 (State only)	8	Visible emissions	20% opacity; 30 seconds in 60 min.
Fugitive Particulate Nuisance Conditions 340-208-0210	9	Fugitive Particulate	N/A
340-226-0210	10	PM (fuel burning equipment)	0.1 gr/dscf
340-228-0210 and 340-208-0610	11	PM (non-fuel burning equipment)	0.1 gr/dscf
Consumer Spray Paint VOC Content Rules [OAR 340-242-0730(4)]	12	VOC Content	Table F 340-242-0720

7. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from insignificant activities 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. [OAR 340-208-0110] Visible emissions shall be measured in accordance with condition 32.

8. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from insignificant activities other than fuel burning equipment for a period or periods aggregating more than thirty seconds in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [OAR 340-208-0600] Visible emissions shall be measured in accordance with condition 32. This condition is only enforceable by the state.

9. The permittee shall not cause, suffer, 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 shall include, but not be limited to the following: [OAR 340-208-0210]

    9.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;
    9.b. Application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
    9.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;
    9.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
    9.e. Adequate containment during sandblasting or other similar operations;
    9.f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
    9.g. The prompt removal from paved streets of earth or other material which does or may become airborne.

10. The permittee shall not cause or allow the emissions of particulate matter in excess of 0.1 grains per dry standard cubic foot from any non-fugitive insignificant activity. [OAR 340-226-0210] Particulate matter emissions shall be measured in accordance with condition 32.

11. 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% CO_2 or 50% excess air, from any fuel burning equipment insignificant activity. [OAR 340-228-0210 and 340-208-0610] OAR 340-208-0610 is only enforceable by the State. Particulate matter emissions shall be measured in accordance with condition 32.

12. 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(4)]

PLANT SITE EMISSION LIMITS

13. The 12-month rolling basis plant site emissions shall not exceed the following: [OAR 340-222-0020] and [OAR 340-222-0040]

Emissions Unit ID number	PM	PM_{10}	SO_2	NO_x	CO	VOC	Monitoring Condition
FACILITY TOTALS	----	----	---	---	---	39 tons/yr	29

REINFORCED PLASTIC COMPOSITE PRODUCTION NESHAP [40 CFR PART 63 SUBPART WWWW]

14. The permittee shall comply with 40 CFR Part 63 Subpart WWWW no later than April 21, 2006. [40 CFR 63.5800]

15. The permittee shall comply with the following work practice standard for all closed molding operations: [40 CFR 5860(a)]

    15.a. Uncover, unwrap or expose only one charge per compression/injection molding machine.
    15.b. For machines with multiple molds, one charge means sufficient material to fill all molds for one cycle.
    15.c. For machines with robotic loaders, no more than one charge may be exposed prior to the loader.
    15.d. For machines fed by hoppers, sufficient material may be uncovered to fill the hopper.
        15.d.1. Hoppers must be closed when not adding materials.
        15.d.2. Materials may be uncovered to feed to slitting machines. Materials must be recovered after slitting.

16. The permittee shall not exceed the weighted average of the HAP emission limits shown in condition 18 using the weighted average of the actual emissions factors for all resin and gel coat application over a 12-month period. The permittee must demonstrate compliance with the weighted average organic HAP emissions limit for all open molding operations. [40 CFR 63.5810]

17. The permittee shall use the equations in the following table to calculate the organic HAP emission factors in order to determine compliance with the table set out in condition 18. [40 CFR 63.5796, 63.5799(a)(1) and (b), and 63.5810(a)(1)]

Operation Type	Application	Resin Type	Organic HAP Emissions Factor (EF) Equation for Materials with less than 33% Organic HAP[1 2 3]	Organic HAP Emissions Factor (EF) Equation for Materials with 33% or more organic HAP[1 2 3]
Open molding	Manual resin	Nonvapor-suppressed	EF=0.126 * % HAP * 2000	EF = ((0.286 * %HAP)-0.0529) *2000
		Vapor-suppressed	EF=0.126 * % HAP * 2000 * (1-(0.5 * VSE factor))	EF = ((0.286 * %HAP)-0.0529) *2000 * (1-(0.5 * VSE factor))
		Vacuum bagging/closed-mold curing with roll out	EF = 0.126 * % HAP * 2000 * 0.8	EF = ((0.286 * % HAP)-0.0529) * 2000 * 0.8
		Vacuum bagging/closed-mold curing without roll-out	EF = 0.126 * % HAP * 2000 * 0.5	EF = ((0.286 * % HAP)-0.0529) * 2000 * 0.5
	Atomized Mechanical resin	Nonvapor-suppressed	EF = 0.169 * %HAP * 2000	EF = ((0.714 * %HAP)–0.18) * 2000
		Vapor-suppressed	EF = 0.169 * %HAP * 2000 * (1-(0.45 * VSE factor))	EF = ((0.714 * %HAP)–0.18) * 2000 * (1-(0.45 * VSE factor))
		Vacuum bagging/closed-mold curing with roll out	EF = 0.169 * % HAP * 2000 * 0.85	EF = ((0.714 * %HAP)-0.18) * 2000 * 0.85
		Vacuum bagging/closed-mold curing without roll-out	EF = 0.126 * % HAP * 2000 * 0.55	EF = ((0.714 * %HAP)-0.18) * 2000 * 0.55
	Nonatomized Mechanical resin	Nonvapor-suppressed	EF = 0.107 * %HAP * 2000	EF = ((0.157 * %HAP)-0.0165) * 2000
		Vapor-suppressed	EF = 0.107 * %HAP * 2000 * (1-(0.45 * VSE factor))	EF = ((0.157 * %HAP)-0.0165) * 2000 * (1-(0.45 * VSE factor))
		Vacuum bagging/closed-mold curing with roll out	EF = 0.107 * %HAP * 2000 * 0.85	EF = ((0.157 * %HAP)-0.0165) * 2000 * 0.85
		Vacuum bagging/closed-mold curing without roll-out	EF = 0.107 * %HAP * 2000 * 0.55	EF = ((0.157 * %HAP)-0.0165) * 2000 * 0.55
	Atomized Mechanical resin with robotic or automated spray control[4]	Nonvapor-suppressed	EF = 0.169 * %HAP * 2000 * 0.77	EF = 0.77 * ((0.714 * %HAP)-0.18) * 2000
	Filament[5]	Nonvapor-suppressed	EF = 0.184 * %HAP * 2000	EF = ((0.2746 * %HAP)-0.0298) * 2000
		Vapor-suppressed	EF = 0.12 * %HAP * 2000	EF = ((0.2746 * %HAP)-0.0298) * 2000 * 0.65

	Atomized Spray Gel Coat	Nonvapor-suppressed	EF = 0.446 * %HAP * 2000	EF = ((1.03646 * %HAP)-0.195) * 2000
	Nonatomized Spray Gel Coat	Nonvapor-suppressed	EF = 0.185 %HAP * 2000	EF = ((0.4506 * %HAP)-0.0505) * 2000
	Manual Gel Coat	Nonvapor-suppressed	EF = 0.126 * %HAP * 2000 (for emission estimate only, see footnote 6)	EF = ((0.286 * %HAP)-0.0529) * 2000 (for emission estimate only, see footnote 6)

Footnotes: [1]The organic HAP emissions factors have units of lbs of organic HAP per ton of rein or gel coat applied.
[2]Percent HAP means total weight percent of organic Hap (styrene, methyl methacrylate, and any other organic HAP) in the resin or gel coat prior to the addition of fillers, catalyst, and promoters. Input the percent HAP as a decimal, i.e. 33% HAP should be input as 0.33, not 33.
[3] The VSE factor means the percent reduction in organic HAP emissions expressed as a decimal measured by the VSE test method of appendix A to this subpart.
[4]This equation is based on an organic HAP emissions factor equation developed for mechanical atomized controlled spray. It may only be used for automated or robotic spray systems with atomized spray. All spray operations using hand held spray guns must use the appropriate mechanical atomized or mechanical nonatomized organic HAP emissions factor equation. Automated or robotic spray systems using nonatomized spray should use the appropriate nonatomized mechanical resin application equation.
[5]Applies only to filament application using an open resin bath. If resin is applied manually or with a spray gun, us the appropriate manual or mechanical application organic HAP emissions factor equation.
[6]Do not use this equation for determining compliance with emission limits in Tables 3 or 5 of 40 CFR Part 63 Subpart WWWW. To determine compliance with emission limits you must treat all gel coat as if it were applied as part of your gel coat spray application operations. If you apply gel coat by manual techniques only, you must treat the gel coat as if it were applied with atomized spray and use Equation 1f to determine compliance with the appropriate emission limits in Table 3 or 5 of 40 CFR Part 63 Subpart WWWW. To estimate emissions from manually applied gel coat, you may either include the gel coat quantities you apply manually with the quantities applied using spray, or use this equation to estimate emissions from the manually applied portion of your gel coat.

18. The permittee must meet the following organic HAP standards for all resins or gelcoats:

Resin type and Application Method	**Operation**	**Organic HAP emissions limit[1]**	**Highest Resin Weight Percent Organic HAP Content, Or Weighted Average Weight Percent Organic HAP Content Allowed[2]**
Open molding - (CR/HS)	Mechanical resin application	112 lb/ton	46.2 with nonatomized resin application
	Filament application	171 lb/ton	42.0
	Manual resin application	123 lb/ton	40.0
Open molding - non-CR/HR	Mechanical resin application	87 lb/ton	38.4 with nonatomized resin application
	Filament application	188 lb/ton	45.0
Open molding - non-CR/HR	Manual resin application	87 lb/ton	33.6
Open molding - tooling	Mechanical resin application	254 lb/ton	43.0 with atomized application, 91.4 with nonatomized application
	Manual resin	157 lb/ton	45.9

Open molding – low-flame spread/low-smoke products	Mechanical resin	497 lb/ton	60.0
	Filament application	270 lb/ton	60.0
	Manual resin application	238 lb/ton	60.0
Open molding – shrinkage controlled resins	Mechanical resin application	354 lb/ton	50.0
	Filament application	215 lb/ton	50.0
	Manual resin application	180 lb/ton	50.0
Open molding – gel coat[3]	Tooling gel coating	437 lb/ton	40.0
	White/off white pigmented gel coating	267 lb/ton	30.0
	All other pigmented gel coating	377 lb/ton	37.0
	CR/HS or high performance gel coat	605 lb/ton	48.0
	Fire retardant gel coat	854 lb/ton	60.0
	Clear production gel coat	522 lb/ton	44.0

Applicability: As required in 40 CFR 63.5796, 63.5805(a) through (c) and (g), 63.5810(a), (b), and (d), 63.5820(c), 63.5830, 63.5835(a), 63.5895(c) and (d), 63.5900(a)(2), and 63.5915(c), the permittee must meet the appropriate organic HAP emissions limits listed in the above table.
Note: CR = corrosion-resistant, HS= high strength
Footnote: [1]Organic HAP emissions limits for open molding and centrifugal casting are expressed as lb/ton. The permittee must be at or below these values based on a 12-month rolling average.
[2]A compliant resin or gel coat means that if its organic HAP content is used to calculate an organic HAP emissions factor, the factor calculated does not exceed the appropriate organic HAP emissions limit shown in the table.
[3]These limits are for spray application of gel coat. Manual gel coat application must be included as part of spray gel coat application for compliance purposes using the same organic HAP emissions factor equation and organic HAP emissions limit. If the permittee only applies the gel coat with manual application, the manually applied gel coat will be treated as if it were applied with atomized spray for compliance determinations.

19. To determine the organic HAP emissions limit the permittee must meet, the permittee shall: [40 CFR 63.5810]

    19.a. Multiply the individual organic HAP emissions limits in the above table for each open molding operation type by the amount of neat resin plus or neat gel coat plus used in the last 12 months for each open molding operation type,
    19.b. Sum these results,
    19.c. Then divide this sum by the total amount of neat resin plus and neat gel coat plus used in open molding over the last 12 months using the following equation to calculate the weighted average organic HAP emissions limit for all open molding operations:

$$\text{Weighted Average Emission Limit} = \frac{\sum_{i=1}^{n} (\text{EL}_i * \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}$$

Where:

EL_i = Organic HAP emissions limit for operation type *i*, lbs/ton from the table below.
$Material_i$ = Neat resin plus or neat gel coat plus used during the last 12-month period for operation type *i*, tons.
n = Number of operations

20. The permittee shall calculate each month the actual weighted average organic HAP emissions factor for open molding by: [40 CFR 63.5810]

    20.a. Multiplying the actual open molding operation organic HAP emissions factors and the amount of neat resin plus and neat gel coat plus used in each open molding operation type,
    20.b. Sum the results, and
    20.c. Then divide this sum by the total amount of neat resin plus and neat gel coat plus using in open molding operations.

21. Use the following equation to calculate the actual weighted average organic HAP emissions factor: [40 CFR 63.5810]

$$\text{Actual Weighted Average Organic HAP Emissions Factor} = \frac{\sum_{i=1}^{n} (\text{Actual Operation EF}_i * \text{Material}_i)}{\sum_{i=1}^{n} \text{Material}_i}$$

Where:

Actual Individual EF_i =Actual organic HAP emissions factor for operation type *i*, lbs/ton.
$Material_i$ = Neat resin plus or neat gel coat plus used during the last 12-month period for operation type *i*, tons.
n = Number of operations

22. Once the permittee has met the organic HAP emissions limit for one operation type using non-corrosion-resistant, corrosion-resistant and/or high strength, or tooling resin, the permittee may use that same resin for all other open molding operations. [40 CFR 63.5810(c)]

23. The permittee is required to be in compliance at all times and demonstrate compliance with all emission limits as set out in condition 18 without the use of add-on controls by keeping a record certifying that you are in compliance. [40 CFR 63.5835(a)]

24. The permittee shall demonstrate initial compliance with the limits as set out in condition 18 by submittal of a certified statement of compliance status included in the report set out in condition 47 that: [40 CFR 63.5860(a)]

    24.a. The appropriate organic HAP emission limits for these operations as calculated using the procedures set out in conditions 19 and 20 on a 12-month rolling average; and
    24.b. That all resins and gel coats considered individually meet the appropriate organic HAP contents as set out in condition 18; and
    24.c. That the weighted average of all resins and gel coats for each resin type and application method meet the appropriate HAP contents.

25. The permittee shall demonstrate initial compliance with the work practice standard set out in condition 15 by submittal of a certified statement of compliance status included in the report set out in condition 47 that the work practices are being performed. [40 CFR 5860(a)]

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

FACILITY WIDE MONITORING REQUIREMENTS

26. The permittee shall conduct monitoring pertaining to condition 5 (particulate size standard) and condition 6 (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.

27. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]

28. 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 THE PLANT SITE EMISSION LIMITS
[OAR 340-218-0050(3)(A) AND (B)]

29. The permittee shall determine monthly emissions as follows;

    29.a. The permittee shall monitor and record the following on a monthly basis:
        29.a.1. For each gelcoat resin type used for Gelcoat resin Application;
            29.a.1.1. lbs of resin used;
            29.a.1.2. percent stryrene of the resin;
            29.a.1.3. whether the resin was applied using controlled spraying
        29.a.2. For each resin type used for Manual Resin Application;
            29.a.2.1. lbs of resin used;
            29.a.2.2. percent stryrene of the resin;
            29.a.2.3. what type of vapor suppressant was used, if any.
            29.a.2.4. whether the resin was cover cured post application or not.
            29.a.2.5. whether the resin was cover cured post rollout or not.
        29.a.3. For each resin type used for Mechanical (Spray) Resin Application;

29.a.3.1. For resin applied using normal (not controlled) spraying;
- 29.a.3.1.1 lbs of resin used;
- 29.a.3.1.2 percent strயrene of the resin;
- 29.a.3.1.3 what type of vapor suppressant was used, if any.
- 29.a.3.1.4 whether the resin was cover cured post application or not.
- 29.a.3.1.5 whether the resin was cover cured post rollout or not.

29.a.3.2. For resin applied using controlled spraying;
- 29.a.3.2.1 lbs of resin used;
- 29.a.3.2.2 percent strयrene of the resin;
- 29.a.3.2.3 what type of vapor suppressant was used, if any.
- 29.a.3.2.4 whether the resin was cover cured post application or not.
- 29.a.3.2.5 whether the resin was cover cured post rollout or not.

29.a.3.3. For resin applied using non-atomizing application;
- 29.a.3.3.1 lbs of resin used;
- 29.a.3.3.2 percent stryrene of the resin;
- 29.a.3.3.3 what type of vapor suppressant was used, if any.
- 29.a.3.3.4 whether the resin was cover cured post application or not.
- 29.a.3.3.5 whether the resin was cover cured post rollout or not.

29.a.4. For each resin type used for Filament Winding Resin Application;
- 29.a.4.1. lbs of resin used;
- 29.a.4.2. percent stryrene of the resin;
- 29.a.4.3. what type of vapor suppressant was used, if any.

29.a.5. For each resin type used for Closed Molding Resin Use;
- 29.a.5.1. lbs of resin used;
- 29.a.5.2. percent stryrene of the resin.

29.b. Percent styrene content for each resin shall be determined based on Material Safety Data Sheets, Technical Data Sheets, or other information as approved by the Department.

29.c. For each calendar month, the permittee shall perform the following calculations by summing the emissions from Resin use, and Miscellaneous VOC use, as calculated below and determining compliance with the PSEL listed in condition 13.

29.c.1. Compute emissions (E) of styrene and MMA from resin use using the following equation:

$$E = \sum \left[R_i \times EF_i . \right]$$

Where:

E	=	Stryrene emissions (lb).
R_i	=	Usage for a resin use (lb).
EF_i	=	Emission Factor for a resin use, calculated from equations below.

Emission Factor equations
Lbs of Styrene Emitted per Lb of Resin Processed

Application Process	Styrene content in resin/gelcoat % (1)		
	%S <33 (2)	%S from 33 to 50 (2)	%S > 50 (2)
Manual	0.126 x %S	(0.286 x %S) - 0.0529	(0.286 x %S) -0.0529
Manual w/VSR (3)	Manual emission factor x (1 – 0.50 x specific VSR reduction factor for each resin/suppressant formulation)		
Mechanical	0.169 x %S	(0.714 x %S) - 0.180	(0.714 x %S) - 0.18
Mechanical w/VSR (3)	Mechanical mission factor x (1 – 0.45 x specific VSR reduction factor for each resin/suppressant formulation)		

Mechanical with Controlled Spray [4]	0.130 x % S	((0.714 x %S) - 0.180) x 0.77	(0.714 x %S) - 0.18) x 0.77
Mechanical with Controlled Spray & VSR [3, 4]	Mechanical w/Controlled Spray emission factor x (1 – 0.45 x specific VSR reduction factor for each resin/suppressant formulation)		
Non-Atomized Mechanical	0.107 x %S	(0.157 x %S) - 0.0165	0.157 x %S) - 0.0165
Non-Atomized Mechanical w/VSR [3]	Non-Atomized Mechanical w/Controlled Spray emission factor x (1 – 0.45 x specific VSR reduction factor for each resin/suppressant formulation)		
Filament application	0.184 x %S	(0.275 x %S) - 0.0298	(0.275 x %S) - 0.0298
Filament application w/VSR	0.120 x %S	((0.275 x %S) - 0.0298) x 0.65	((0.275 x %S) - 0.0298) x 0.65
Gelcoat application	0.445 x %S	(1.0365 x %S) - 0.195	1.0365 x %S) - 0.195
Gelcoat Controlled Spray application [4]	0.325 x %S	((1.0365 x %S) - 0.195) x 0.73	(1.0365 x %S) - 0.195) x 0.73
Covered-Cure with Roll-Out [5]	Non-VSR process emission factor x (0.80 for Manual <or> 0.85 for Mechanical)		
Covered-Cure w/out Roll-Out [5]	Non-VSR process emission factor x (0.50 for Manual <or> 0.55 for Mechanical)		
Resin Transfer Molding	0.02 x %S		

Emission Factor equation for MMA
Lbs of Methyl Methacrylate Emitted per Lb. of Gelcoat Process

Gel coat application	0.75 x %MMA

Notes
1. Including styrene monomer content as supplied, plus any extra styrene monomer added by the molder, but before addition of other additives such as powders, fibers, glass, etc.
2. The value for “% S” (percent styrene) in the formulas above shall be a decimal fraction by weight. For example use the input value 0.30 for a 30% styrene content.
3. VSR = vapor suppressed resin. The VSR reduction factor is determined by testing each resin/suppressant formulation according to the procedures detailed in the ***CFA Vapor Suppressant Effectiveness Test.***
4. See the ***CFA Controlled Spray Handbook*** for a detailed description of the controlled spray procedures.
5. Covered cure includes open wet-cut press molding, vacuum bagging, and barrier film application. The styrene impermeable cover may be applied after roll-out or just after the application of resin with out any roll-out.
6. Including MMA monomer content as supplied, plus any extra MMA monomer added by the molder but before addition of other additives such as powders, fillers, glass, etc.

29.d. Emissions from Miscellaneous VOC use shall be calculated on a mass balance basis as follows:

$\mathbf{VOC_{MSC}} = VOC_{in} - VOC_{waste}$

where;

$\mathbf{VOC_{MSC}}$ = VOC emissions.(lb)

$\mathbf{VOC_{in}}$ = weight of VOC in materials used. (lb)

$\mathbf{VOC_{waste}}$ = $m_{dis} \times \%VOC_{dis}$

where;

$\mathbf{m_{dis}}$ = weight of VOC containing waste shipped off site.

$\mathbf{\%VOC_{dis}}$ = VOC content of waste (lb per lb).

30. Not later than the end of each month, the permittee shall determine compliance with condition 13 (Rolling 12-month PSELs) by summing the emissions calculated in condition 13 for the preceding 12 calendar months, and adding the Aggregate Insignificant emissions of 1 ton per year of PM, PM10, and VOC, by pollutant, and comparing the resulting totals to the PSEL listed in condition 13.

TEST METHODS AND PROCEDURES
[OAR 340-212-0120]

GENERAL TESTING REQUIREMENTS

31. 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]

31.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.

31.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.

31.c. Unless otherwise specified by permit condition or Department approved source test plan, all compliance source tests must be performed as follows:

31.c.1. at least 90% of the design capacity for new or modified equipment;

31.c.2. at least 90% of the maximum operating rate for existing equipment; or

31.c.3. 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 90^{th} 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.

31.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.

31.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.

32. 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:

Applicable Requirement	Test Method	Averaging time	Special conditions:
7 and 8	Modified EPA Method 9 in accordance with the Department's Source Sampling Manual	aggregate of 30 seconds or 3 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.

10 and 11	ODEQ Method 5	average of three one-hour test runs	ODEQ Method 5 is for indirect contact fuel burning equipment (e.g., boilers) and any other source.
10 and 11	ODEQ Method 7	average of three one-hour test runs	ODEQ Method 7 is for direct contact combustion or other heat sources (e.g., particle and veneer dryers)
11	ODEQ Method 8	average of three one-hour test runs	ODEQ Method 8 is for sources with exhaust gases at essentially ambient conditions (e.g. material handling cyclones)

33. CFA Vapor Suppressant Effectiveness (VSR) Test Protocol Revision 1. I - April 7, 1999

Scope and Application
This test method employs a mass balance technique to establish the relative loss of the volatile component from unsaturated polyester or vinyl ester resins. The effectiveness of a specific vapor suppressant and resin mixture is determined by comparing the relative volatile weight losses from vapor-suppressed and non-suppressed resins. The volatile species are not separately analyzed.

Summary of Method
Differences in resin and suppressant chemistry often affect the performance of a vapor suppressant. The purpose of this test method is to quantify the effectiveness of a specific vapor suppressant (VS) added to a specific unsaturated polyester or vinyl ester resin.
This comparative test quantifies the loss of volatiles from the laminate during the roll out and curing phases for resins formulated both with and without a suppressant additive.
The quantitative results of this test are used as an input factor in the UEF emissions model, which allows the UEF to predict emissions from specific combinations of resin and suppressant. This test does not measure absolute emission rates for the entire lamination process.
Definitions
Terms:
a. **Vapor suppressant -** an additive that inhibits the evaporation of volatile components in unsaturated polyester or vinyl ester thermoset resins.
b. **Unsaturated polyester resin -** a thermoset resin commonly used in composites molding.
c. **Unsaturated vinyl ester resin -** a thermoset resin used in composites molding for corrosion resistant and high performance applications.
d. **Laminate -** a combination of glass fiber reinforcement and a thermoset resin.
e. **Chopped strand mat -** a glass fiber reinforcement with random fiber orientation.
f. **Initiator -** a curing agent added to a thermoset resin.
g. **FRP roller -** a special tool used to saturate and compact a wet laminate.
h. **Gel time -** the time from the addition of initiator in a resin to when the resin polymerizes into the gel state.

Acronyms:
a. **VS -** vapor suppressed
b. **NVS -** non-vapor suppressed
c. **VSE -** vapor suppressant effectiveness
d. **CSM -** Chopped strand mat

Equipment
a. Balance enclosure
b. Laboratory balances (2) - accurate to ± 0.0l g.
c. Stop watch or balance data recording output
d. Thermometers - accurate to ± 1.0 deg. F
e. 14” x 14” aluminum plate, 1/16” thick
f. 16” x 16” Mylar sheet, 4 mil thickness

g. 250ml plastic tri-corner beakers
h. Eye droppers or pipettes
i. Disposable FRP rollers, 3” wide x 3/16” diameter

Supplies
a. Chopped strand mat (nominal 1.5 oz/ft^2)
b. Initiator (often called “catalyst” by the composites industry)
c. Resin
d. Vapor suppressant

Sample Collection, Preservation, and Storage
This test method involved the immediate recording of data during the roll out and curing phases of the lamination process during each test run. Samples are not collected, preserved nor stored.

Quality Control
Careful attention to laboratory procedure, routine equipment calibration, and replicate testing are the quality control activities for this test method. Please refer to the procedures below
A minimum of six (6) test run pair replicates are performed for each resin and suppressant test formulation

Calibration and Standardization
The laboratory balances are calibrated before and after each session of six (6) test runs, using ASTM certified weights.

Procedure
Test run set-up
a. The laboratory balance is placed in an enclosure to prevent fluctuations in balance readings due to air movement. The front of the balance enclosure is left open, but positioned so that ambient airflow will not effect balance readings.
b. The aluminum plate is covered with a plastic film (4 mil Mylar..-), which may be held in position with four pieces of double-sided tape on the comers of the aluminum plate.
c. The plate and plastic film are positioned on the balance.
d. The resin is adjusted to room temperature.
e. Two plies of nominal 1.5 oz/ft7 chopped strand mat are cut to a dimension of 12” x 12”

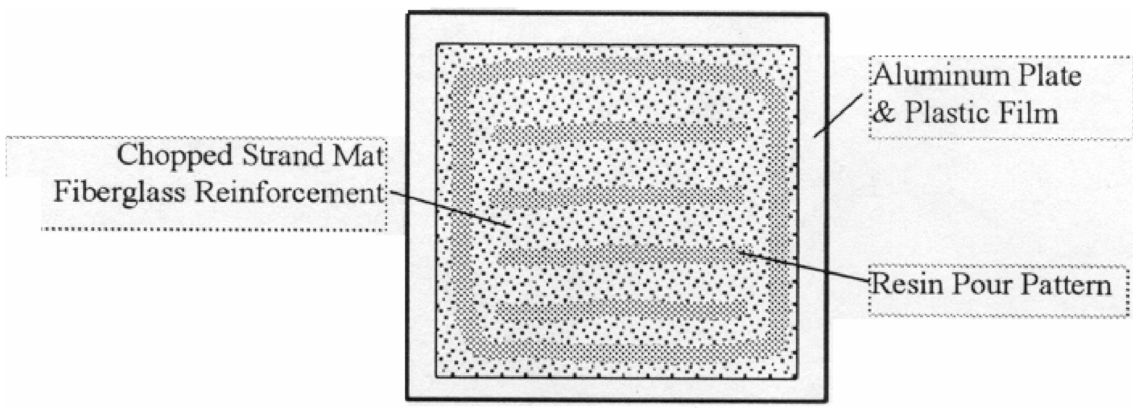
Test run procedure for non-suppressed resin
a. Two plies of chopped strand mat (measuring 12” x 12”) are placed on the plate and the weight is measured and recorded.
b. The required resin weight and initiator weight are calculated.
c. A disposable FRP roller is placed on the edge of the plate.
d. The balance is tared, which means the balance reading is set to zero with the aluminum plate, Mylar film, glass mat, and FRP roller on the balance pan.
e. The resin and initiator are weighed on the second balance and mixed.
f. The resin is poured onto the chopped strand mat in a pre-determined pattern (see below).
g. The stopwatch is started and the start time is recorded.
h. The initial weight is recorded.
i. The plate is removed from the balance.
j. The FRP roller is used to disperse the resin evenly across the glass mat.
k. The wet laminate is rolled out to eliminate normal air voids. Rollout time should be in the range of 2 to 3 minutes.
1. The FRP roller is placed on the edge of the plate when roll out is completed.
m. The roll out time is recorded by stopwatch.
n. The plate and FRP roller are placed back on the balance pan. The weight is recorded at the five-minute mark.

o. The weight is recorded every five minutes, until three consecutive equal weights or a weight gain is observed.

Test run procedure for vapor suppressed resin
Repeat the above procedure after adding the suppressant additive to the resin as required. A consecutive non-suppressed test run and vapor-suppressed test run constitute one test pair.

Test pair comparison criteria
a. The laminate roll out time must be within ± 30 seconds for each test run pair.
b. Temperature for each test run pair must be maintained within ± 20F. c. Catalyst percentage must be the same for each test run pair.

Resin Application Pour Pattern
To facilitate the distribution of resin across the chopped strand mat, and to provide consistency from test to test, a uniform pour pattern should be used. The recommended pour pattern is shown below:



Data Analysis
This test method only requires a simple mass balance calculation - no special data analysis is necessary.

Calculations
a) Resin weight determination:
CSM fiberglass weight x 3 = Resin weight
(for a 25:75 resin-to-glass ratio)
b) Initiator (catalyst) weight determination:
Resin weight x Initiator % = Initiator weight
c) Emissions loss determination (weight):
Start weight - End weight = Emission loss weight
d) Emissions wt. loss determination (% of resin weight):
Emissions loss (wt) ÷ Resin weight x 100 = % Emissions per resin wt
e) Vapor suppressant effectiveness (VSE_i) for one test pair

Vapor-suppressed		Non-suppressed		
emissions wt. loss	÷	emissions wt. loss	x	100 = VSE

f) Vapor suppressant effectiveness (VSE_{resin}) for resin formulation (assuming six test pairs per test session)

$$\sum_{i}^{n=6} (VSE_i) \div 6 = VSE_{resin}$$

MONITORING REQUIREMENTS FOR THE REINFORCED PLASTIC COMPOSITE PRODUCTION NESHAP: [40 CFR Part 63 Subpart WWWW]

34. The permittee shall demonstrate compliance for all closed molding operations by performing the work practice standards set out in condition 15, as applicable. [40 CFR 5900(4)]

35. The permittee shall demonstrate compliance by comparing the values obtained from using the equations in conditions 19 and 20.

   35.a. The permittee is in compliance if each 12-month rolling average organic HAP emissions factor is less than or equal to the corresponding 12-month rolling average organic HAP emissions limit.

36. If information provided by the material manufacturer (i.e. MSDS) is used to determine the organic HAP content of resins and gel coats to determine compliance, then the permittee must: [40 CFR 63.5797(a) through (c)]

   36.a. 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).
   36.b. Use the upper limit if the material supplier provides a range for the organic HAP content.
   36.c. Use the measured organic HAP content, obtained from such analyses as EPA's Method 311 of appendix A to 40 CFR Part 63, if it exceeds the material supplier provided upper range limit of the total organic HAP content.
   36.d. Use the measured total organic HAP content if that value exceeds the material supplier provided value by two (2) percentage points or more; if the measured total organic HAP content is within two (2) percentage points of the material supplier provided value, then the permittee may use the MSDS value.

37. The Permittee must monitor and collect data as follows:

   37.a. If after the initial demonstration the permittee changes to a higher organic HAP resin or gel coat, or increases the resin or gel coat organic HAP content, or change to a higher emitting resin or gel coat application method, then the permittee must either: [40 CFR 63.5895(d)]
      37.a.1. Demonstrate that all resins and gel coats still meet the applicable organic HAP emissions limits, or;
      37.a.2. Begin collecting resin and gel coat use records and calculate compliance on a 12-month rolling average.

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

38. The permittee shall maintain the following general records of required monitoring information:

   38.a. The date, place as defined in the permit, and time of sampling or measurements;
   38.b. The date(s) analyses were performed;
   38.c. The company or entity that performed the analyses;
   38.d. The analytical techniques or methods used;
   38.e. The results of such analyses;
   38.f. The operating conditions as existing at the time of sampling or measurement; and
   38.g. Actions taken in response an Air Pollution Alert, Warning, or Emergency Episode;

39. 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)]

40. The permittee shall maintain the following specific records of required monitoring information:

 40.a. The complaint log, as required by condition 26
 40.b. Monthly records of resin use and emission calculations as required by condition 29.
 40.c. Monthly records of Miscellaneous VOC use as required in condition 29;
 40.d. Monthly and annual plant-wide VOC emissions;
 40.e. Annual non-VOC HAPs emitted;
 40.f. Monthly and annual quantities of VOCs contained in waste disposed off site.

41. Monthly records shall be available for inspection on or before the 30th calendar day following the last day of each calendar month.

42. The permittee shall retain records of all required monitoring data and support information for a period of at least 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)]

RECORDKEEPING REQUIREMENTS FOR THE REINFORCED PLASTIC COMPOSITE PRODUCTION NESHAP: [40 CFR Part 63 Subpart WWWW]

43. 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 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 63.5920(a) through (d) and 40 CFR 63.5915 (a) through (d)]

 43.a. A copy of each notification and report submitted pertaining to compliance with 40 CFR 63 Subpart WWWW.
 43.b. Records of performance tests, design, and performance evaluations as required in 40 CFR 63.10(b)(2).
 43.c. Records of resin and gel coat use, organic HAP content, and operation where the resin is used. [40 CFR 63.5895(c)]
  43.c.1. Resin use records may be based on purchase records if the permittee can reasonably estimate how the resin is applied.
  43.c.2. The organic HAP content records may be based on MSDS or on resin specifications supplied by the resin supplier.

 43.d. All data, assumptions, and calculations used to determine organic HAP emissions factors or average organic HAP contents for operations listed in the table in condition 15. [40 CFR 63.5915(c)]
 43.e. All data, assumptions, and calculations used to derive the organic HAP emissions estimation equations and factors and identification and rationale for the worst-case formula when using facility-specific organic HAP emissions estimation equations or factors; and

43.f. Documentation that the Department has approved all organic HAP emissions estimation equations and organic HAP emission factors, as applicable.

43.g. A certified statement of compliance with the work practice standard as set out in condition 15. [40 CFR 63.5915(c)]

REPORTING REQUIREMENTS

44. 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 and OAR 340-214-0330(2) and 340-214-0340.

44.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.

44.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.

44.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 non-attainment area for a pollutant which may be emitted in excess of applicable standards.

44.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.

44.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)].

45. 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)]

46. 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

47. 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)]]

    47.a. The first semi-annual report is due on July 30 and must include the semi-annual compliance certification for January through June; OAR 340-218-0080.

    47.b. The second semi-annual report is due February 15 and must consist of the semi-annual compliance certification for July through December, and the annual report in condition 49; OAR 340-218-0080.

48. 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)]

    48.a. The identification of each term or condition of the permit that is the basis of the certification;

    48.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;

    48.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 48.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

    48.d. Such other facts as the Department may require in order to determine the compliance status of the source.

    48.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)]

49. 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)]

    49.a. A copy of the complaint log;
    49.b. Plant-wide rolling 12-month VOC, PM, and PM_{10} emissions for each month of the reporting year;
    49.c. Monthly records of resin use as required by condition 29;
    49.d. Miscellaneous VOC materials used monthly, recorded on Department approved forms;
    49.e. Monthly non-VOC HAP use;
    49.f. Quantities and types of fuel used on an annual basis;
    49.g. The emission fee report;
    49.h. The excess emissions upset log, OAR 340-0214-0340; and,
    49.i. The second semi-annual compliance certification as set out in condition 47.b.

REPORTING REQUIREMENTS FOR THE REINFORCED PLASTIC COMPOSITE PRODUCTION NESHAP: [40 CFR Part 63 Subpart WWWW]

50. The permittee must submit the following compliance report containing the following information semi-annually, unless otherwise approved by the Department under 40 CFR 63.10(a): [40 CFR 63.5910(a) through (d)]

    50.a. Company name and address.
    50.b. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report.
    50.c. Date of the report and beginning and ending dates of the reporting period.
    50.d. The total operating time of each affected source during the reporting period.
    50.e. Information on the number, duration, and cause of deviations (including unknown cause, if applicable), as applicable, and the corrective action taken.
    50.f. A statement as to the number and type of deviations from any emission limitations during the reporting period.
    50.g. The permittee shall submit a certified statement in the initial compliance report that the work practices set out in condition 15 are being performed. [40 CFR 63.5860(a)]
        50.g.1. If the permittee initially demonstrates compliance by submitting the statement of compliance in condition 50.g, then continued formal reporting stating continuous compliance with the work practice standard is not required. [40 CFR 63.5900(4)]

51. If the permittee initially demonstrates that all resins and gel coats individually meet the applicable organic HAP emissions limits, or organic HAP content limits, then gel coats and resin and gel coat use records are not required; however, the permittee shall: [40 CFR 63.5895(d)]

    51.a. Provide a statement in each compliance report that all resins and gel coats still meet the organic HAP limits for compliant resins and gel coats.

52. If the permittee changes any information submitted in any notification, the permittee must submit the changes in writing to the Department within 15 calendar days after change. [40 CFR 63.5905(b)]

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

DEQ – Northwest Region
2020 SW 4th Ave., Suite 400
Portland, OR 97201
(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

54. 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
232-0020 through 0240	b
258-0400	b
242-0500 through 0520	b
258-0110 through 0300	b
204-0090	b
234-0010 through 0430	b
206-0050	b
218-0050(4)	b
218-0100	b
202-0010 through 0220	b
204-0050 through 0060	b
210-0100 through 0120	b
210-0200 through 0220	b
218-0090	b
40 CFR part 55	b
40 CFR part 57	b
40 CFR part 60 (except subpart A and all Appendices)	b
40 CFR part 61 (except subpart A, M and all Appendices)	b
40 CFR part 63 (except subpart A and all Appendices)	b
40 CFR part 68	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
240-0100 through 0270	c
240-0300 through 0360	c
208-0650 through 0670	c
226-03100 through 0320	e
228-0200	e

Applicable Requirement	Reason Code
260-0010 through 0030	e
256-0130	e
256-0200 through 0350	e
204-0080	e
238-0050	e
238-0060 through 0080	e
238-0100	e
236-0500	e
230-0030	e
Applicable Requirement	Reason Code
230-400 through 410	e
230-0010 through 0230	e
208-0520	e
208-560	e
208-570	e
208-630	e
228-0100 through 0130	f
214-0130	h
226-0400	h
222-0050	h
222-0060	h
218-0050(8)	h
244-0100 through 0180	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 may 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

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November 3, 2006