



# PUBLIC NOTICE

Date posted: 10/30/2023

## LRAPA Requests Comments on the Proposed Air Quality Permit for Arclin USA, LLC

### HOW TO PROVIDE PUBLIC COMMENT

**Facility name:** Arclin USA, LLC

**Permit number:** 201221

**Permit type:** Standard Air Contaminant Discharge Permit

**Comments due by:** December 5, 2023 at 5 p.m.

**Submit written comments:**

**By mail:** Lane Regional Air Protection Agency  
1010 Main Street  
Springfield, OR 97477

**By email:** [permitting@lrapa.org](mailto:permitting@lrapa.org)

The Lane Regional Air Protection Agency invites the public to submit written comments on the conditions of the proposed air quality permit, known officially as a Standard Air Contaminant Discharge Permit (ACDP), for Arclin USA, LLC ("Arclin" or "facility").

### Summary

LRAPA received an air quality permit renewal application for Arclin located at 475 North 28th Street in Springfield on April 29, 2021. LRAPA last issued an air quality permit to Arclin on September 1, 2016, with an expiration date of September 1, 2021. Arclin submitted a renewal application prior to this expiration date and LRAPA administratively extended the existing permit until a permitting decision could be made on the renewal application. A Standard ACDP is valid for five (5) years from the date of issuance.

### About the facility

Arclin manufactures formaldehyde and various types of resins incorporating formaldehyde. The facility has been in operation since 1965 and was first permitted in 1995.

### What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the tables at the end of this document.

### How does LRAPA determine permit requirements?

LRAPA evaluates types and amounts of pollutants and the facility's location and determines permit requirements according to state and federal regulations.

### How does LRAPA monitor compliance with the permit requirements?

This permit will require the facility to monitor pollutants using federally-approved monitoring practices and standards. The facility will be required to compile this data into an annual report for submission to LRAPA for compliance evaluation. LRAPA will also perform regular compliance inspections of the facility to assure compliance with the permit requirements. LRAPA last inspected the facility in

September 2017.

## How do I request a public hearing?

If LRAPA receives written requests from ten persons, or from an organization representing at least ten persons, LRAPA will schedule a public hearing on the draft permit. By default, this public hearing will be conducted virtually. LRAPA will provide a minimum of 30 days' notice of a public hearing, specifying the virtual platform to be used, to allow interested persons to submit oral or written comments.

If the requesting party wishes to add an in-person component to the virtual hearing, they must provide a justification for this request. This justification should explicitly outline the need for an in-person component, taking into consideration that virtual hearings are the default format due to the cost and resource limitations of the agency. If the justification is deemed sufficient by LRAPA, a hybrid hearing that includes both virtual and in-person components will be scheduled at a reasonable place and time to allow interested persons to submit oral or written comments.

## What happens after the public comment period ends?

After the public comment period ends, including any public hearing, LRAPA will consider and respond to all relevant comments received during the public comment period and may modify the proposed permit based on comments.

If a facility meets all legal requirements, LRAPA will issue the facility a final Standard ACDP.

## Where can I get more information?

View the draft permit and review report at [www.lrapa.org/air-quality-protection/public-calendar](http://www.lrapa.org/air-quality-protection/public-calendar) or contact LRAPA at:

**Phone:** 541-736-1056

**Email:** [permitting@lrapa.org](mailto:permitting@lrapa.org)

To view the application and related documents in person at the LRAPA office in Springfield, Oregon, please call LRAPA at the phone number listed above to schedule an appointment.

## Non-discrimination statement

LRAPA does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities. View LRAPA's [non-discrimination policy](#).

## Emissions limits

**Criteria Pollutants and Greenhouse Gases:** Table 1 below presents maximum **allowable** emissions of criteria pollutants and greenhouse gases for the facility. The current emission limit reflects maximum emissions that the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions that the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit. A proposed emission limit of de minimis means that the facility does not emit this pollutant above the de minimis emission level as defined in LRAPA [title 12](#).

**Table 1**

<b>Criteria Pollutant</b>	<b>Current Limit (tons/yr)</b>	<b>Proposed Limit (tons/yr)</b>	<b>2022 Actual Emissions (tons/yr)</b>
Particulate matter	24	de minimis	--
Coarse particulate matter (PM <sub>10</sub> )	14	de minimis	--
Fine particulate matter (PM <sub>2.5</sub> )	9	de minimis	--
Nitrogen oxides	99	11	1.5
Carbon monoxide	39	17	4.7
Volatile organic compounds	50	22	5.8
Greenhouse gases (CO <sub>2</sub> eq.)	74,000	11,284	1,762

For more information about criteria pollutants, visit EPA's [Criteria Air Pollutant web page](#).

**Hazardous air pollutants:** This facility has the capacity to be a major source of federal hazardous air pollutants (HAP) emissions. A major source of federal HAPs has potential emissions for an individual federal HAP that exceed 10 tons per year or potential emissions for the aggregate of all federal HAPs that exceed 25 tons per year. This facility has previously elected limits on their potential to emit of federal HAPs such that they are considered a synthetic minor source. Table 2 lists the highest emitted single federal HAP and the aggregate of all federal HAPs emitted by the source. For more information about hazardous air pollutants, visit EPA's [Health Effects Notebook for Hazardous Air Pollutants](#).

**Table 2**

<b>Hazardous Air Pollutants</b>	<b>Potential Emissions (tons/yr)</b>	<b>2022 Actual Emissions (tons/yr)</b>
Formaldehyde	9.4	8.1
<b>Total HAP Emissions</b>	<b>24</b>	<b>11</b>