



BASIC AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
(541) 736-1056

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Voith US Inc.
2885 Olympic Street
Springfield, Oregon 97478

INFORMATION RELIED UPON:

Application No.: 69613
Date Received: May 4, 2023

PLANT SITE LOCATION:

Voith US Inc. (VPRO)
2885 Olympic Street
Springfield, Oregon 97478

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Springfield
Approval Date: October 21, 1997

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director

7-21-23

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Title 37, Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 8	Sources not elsewhere classified with actual emissions of more than 1 ton/year VOC and/or HAP.	3554

Addendum No. 1
Non-PSD/NSR Basic Technical Permit Modification

In accordance with 37-0056(4) of LRAPA's Rules and Regulations, Basic Air Contaminant Discharge Permit No. 204417 is hereby amended on July 21, 2023 to add conditions for thermal metal arc spraying. The following conditions were either modified, added, or renumbered as a result of the addendum: (All new language is in **bold**):

Condition 2.7: New condition to add a chromium VI limit.
Condition 2.8: Renumbered condition 2.7
Condition 2.9: Renumbered condition 2.7, modified to include new reporting requirements.
Conditions 2.10: New condition to add requirement for new data sheets to be submitted annually.
Conditions 2.11 – 2.12: New conditions to add calculations and EFs for calculating chromium VI emissions.
Conditions 2.13 – 4.8: Renumbered conditions 2.9 - 4.8, no changes.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.7 Chromium VI Limit **The permittee must not exceed 0.45 lb/yr of chromium VI emissions from thermal spray operations.**

RECORDKEEPING AND REPORTING REQUIREMENTS

2.9 Annual Reports The permittee must submit an annual report to LRAPA by February 15th of each year. The report must contain the following:

- a. The amount (pounds) of rubber used.
- b. The amount (therms) of natural gas burned in the boilers.
- c. The amount (pounds) of abrasive material used for sandblasting.
- d. The coating, solvent, and cover material usage amounts (pounds).
- e. **The amount (pounds) and type of thermal spray wire used.**
- f. **The amount (pounds) of Chromium VI emitted.**

2.10 Data Sheets **The permittee must provide new or updated product Data Sheets (i.e. Safety Data Sheets, Environmental Data Sheets, etc.) for all thermal spray wire used, with each annual report.**

For any Data Sheets that provide a range of values for the product composition, the highest value must be used for emissions calculations.

2.11 Calculating Chromium VI emissions from thermal spraying

For Chromium VI containing materials used in thermal spraying, the permittee must calculate Chromium VI emissions using the following formula:

$$E = ((\sum (W \times Cr)) \times EF_F \times (1 - CE)) + ((\sum (W \times Cr)) \times EF_C)$$

Where:

E = Pollutant emissions in pounds/year;

∑ = Symbol representing “summation of”;

W = Thermal spray wire usage in pounds;

Cr = Chromium VI content as a weight percentage of each thermal spray wire used, as obtained from the product data sheets;

EF_F = Emission factor for fugitive emissions as identified in the table below;

CE = Capture efficiency of the control device;

EF_C = Emission factor for controlled emissions as identified in the table below.

2.12 Emission Factors

	Emission Factors (lb Cr+6/lb Cr+6 sprayed)
EF_F	0.00696
EF_C	0.000696



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This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Voith US Inc.
2620 East Glendale Avenue
Appleton, Wisconsin 54911

INFORMATION RELIED UPON:

Application No.: 66468
Date Received: October 16, 2020

PLANT SITE LOCATION:

Voith US Inc. (VPRO)
2885 Olympic Street
Springfield, Oregon 97478

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Springfield
Approval Date: October 21, 1997

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director

2-7-22

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Title 37, Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 8	Sources not elsewhere classified with actual emissions of more than 1 ton/year VOC and/or HAP.	3554

STATEMENT OF PURPOSE

- 1.1 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible emission limits** Emissions from any air contaminant source must not exceed an opacity equal to or greater than 20% for a period aggregating more than 3 minutes in any one hour. "Opacity" means the degree to which an emission reduces transmission of light and obscures the view of an object in the background. The aggregate times consist of the total duration of all readings during the observation period that are equal or greater than 20% opacity, whether or not the readings are consecutive. Each observation represents 15 seconds of time. The visible emissions standard in this condition does not apply to fugitive emissions from the source. [LRAPA 32-010]
- 2.2 Particulate Emission Limitations for Sources Other Than Fuel Burning Equipment** Particulate matter emissions from any air contaminant source must not exceed 0.14 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)]
- 2.3 Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive particulate matter emissions. [LRAPA 48-015]
- 2.4 Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]
- 2.5 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010]
- 2.6 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

RECORDKEEPING AND REPORTING REQUIREMENTS

- 2.7 Records** The permittee must maintain all records pertaining to pollutant emissions, as outlined in Condition 2.9, onsite for at least 5 years from the date of the record, and must be made available to LRAPA upon request. [LRAPA 34-016(5)]
- 2.8 Annual Reports** The permittee must submit an annual report to LRAPA by February 15th of each year. The report must contain the following:
- a. The amount (pounds) of rubber used.
 - b. The amount (therms) of natural gas burned in the boilers.
 - c. The amount (pounds) of abrasive material used for sandblasting.
 - d. The coating, solvent, and cover material usage amounts (pounds).
- 2.9 Permit Renewal** An application to renew the permit is due 30 days prior to the permit expiration date. [LRAPA 37-0040(2)(b)(A)]
- 2.10 Construction or Modification Notices** The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to, or emissions are significantly changed or increased. [LRAPA 34-034]
- 2.11 Notice of Change of Ownership or Company Name** The permittee must promptly notify LRAPA of any change of mailing address, company name, or plant ownership. The permit will expire 60 days after a change in the legal entity owning/operating the facility unless application, with appropriate fees, is made to transfer the permit to the new entity. [LRAPA 37-0030(4)]
- 2.12 Where to Send Reports and Notices** The reports and notices, with the permit number prominently displayed, must be sent to the LRAPA office identified on the cover page of the permit.
- 3.0 Fees**
- 3.1 Fees** The Annual Fee for a Basic Air Contaminant Discharge Permit (ACDP) is specified in LRAPA Title 37, Section 37-8020, Table 2, Part 2. The Annual Cleaner Air Oregon (CAO) fee for a Basic ACDP is specified in LRAPA Title 37, Section 37-8020 Table 2, Part 3. Both fees are due on **December 1** of each year this permit is in effect. An invoice

indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

4.0 GENERAL CONDITIONS

- 4.1 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050]
- 4.2 Outdoor Burning** The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.
- 4.3 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance must be performed by persons certified for asbestos abatement projects.
- 4.4 Permit Availability** The permittee must have a copy of the permit available at the facility at all times. [LRAPA 37-0020(3)]
- 4.5 LRAPA Inspections** The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with LRAPA Section 13-020. [ORS 468.095(1) and LRAPA 13-020(1)(h)]
- 4.6 Legal Disclaimers** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 4.7 Permit Revocation** This permit is subject to revocation for cause as provided in LRAPA Section 37-0082.
- 4.8 LRAPA Contact** Call the LRAPA office in Springfield at (541) 736-1056.



Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Voith US Inc.
 2885 Olympic Street
 Springfield, Oregon 97478

Reports			NSPS	NESHAP	Size	Public Notice
Annual	Semi-annual	Excess Emissions				
Feb 15	N/A	X	N/A	N/A	B	1

1. The proposed permit is a renewal for an existing Air Contaminant Discharge Permit (ACDP) which was issued on January 11, 2011 and was originally scheduled to expire on January 11, 2021. Initially, this facility was classified as a Simple "Low" however it qualifies as a Basic. As part of the 2011 renewal, the Simple ACDP was converted to a Basic ACDP in accordance with the rules adopted in 2008.
2. The facility was built in 1998 and the facility operates a paper machine roll covering repair and remanufacturing operation. These are the large rolls used in paper manufacturing. The facility repairs and rebalances worn or damaged rolls, and then reapplies the proper coating type (rubber, polyurethane, or resin).

The repair and remanufacturing process takes place in two buildings, and involves general metal fabrication (drilling, grinding, tooling, balancing, and welding), sandblasting, extruding rubber and curing the rubber coatings in autoclaves, and polyurethane and resin extrusion along with a curing oven. There is also grinding of the cured rubber coating. There are three (3) baghouses to control PM emissions from the metal fabrication processes, and an additional, portable, filter used when welding occurs.

There is one 0.76 MMBtu natural gas fired boiler/water heater used in the north building, and two 1.34 MMBtu natural gas fired boilers used to generate steam for heating the autoclave in the south building. The autoclave operates at a maximum temperature of 310°F.

3. This facility qualifies for a Basic ACDP because the emissions will be more than 1 ton/year VOC and/or HAP and less than 5 tons/yr. PM₁₀ in a PM₁₀ nonattainment or maintenance area, and less than 10 tons/yr. for each criteria pollutant emissions.
4. The facility is located in a maintenance area for CO and PM₁₀. The area is in attainment for all other criteria pollutants.



5. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases the emission will not exceed 5 tons of PM or PM₁₀ or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
6. The facility is required to record and report annually, by February 15th, the amount of rubber used, the amount of natural gas burned in the boilers, the amount of abrasive material used, and the amount of coatings, solvents, and cover material used. The reporting amounts will be used by LRAPA to estimate actual emissions and confirm that the facility qualifies for a Basic ACDP.
7. Pursuant to LRAPA Section 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

CNC/rcr
02/01/2022



Lane Regional Air Protection Agency

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 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Voith US Inc.
 2885 Olympic Street
 Springfield, Oregon 97478

Reports			NSPS	NESHAP	Size	Public Notice
Annual	Semi-annual	Excess Emissions				
Feb 15	N/A	X	N/A	N/A	B	I

1. **This permit action is for a modification to the existing permit that was renewed on February 7, 2022.**

In 2023 the facility installed a stationary dust collector and desiccant air dryer to replace the portable dust collector they were using. During the construction application process, LRAPA became aware of the facility’s thermal arc spray operation. Thermal spraying generally emits more particulate matter than welding does, and it raises concerns for chromium VI emissions. The discovery of thermal spraying operations required additional reporting requirements and a chromium VI emission limit to be added to the permit.

2. The facility was built in 1998 and the facility operates a paper machine roll covering repair and remanufacturing operation. These are the large rolls used in paper manufacturing. The facility repairs and rebalances worn or damaged rolls, and then reapplies the proper coating type (rubber, polyurethane, or resin).

The repair and remanufacturing process takes place in two buildings, and involves general metal fabrication (drilling, grinding, tooling, balancing, and welding), sandblasting, extruding rubber and curing the rubber coatings in autoclaves, and polyurethane and resin extrusion along with a curing oven. There is also grinding of the cured rubber coating. There are three (3) baghouses to control PM emissions from the metal fabrication processes, and a dust collector that is used for welding and thermal spraying operations.

There is one 0.76 MMBtu natural gas fired boiler/water heater used in the north building, and two 1.34 MMBtu natural gas fired boilers used to generate steam for heating the autoclave in the south building. The autoclave operates at a maximum temperature of 310°F.

3. This facility qualifies for a Basic ACDP because the emissions will be more than 1 ton/year VOC and/or HAP and less than 5 tons/yr. PM₁₀ in a PM₁₀ nonattainment or maintenance area, and less than 10 tons/yr. for each criteria pollutant emissions.
4. The facility is located in a maintenance area for CO and PM₁₀. The area is in attainment for all other criteria pollutants.
5. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases the emission will not exceed 5 tons of PM or PM₁₀ or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
6. The facility is required to record and report annually, by February 15th, the amount of rubber used, the amount of natural gas burned in the boilers, the amount of abrasive material used, **the amount of thermal spray wire used**, and the amount of coatings, solvents, and cover material used. The reporting amounts will be used by LRAPA to estimate actual emissions and confirm that the facility qualifies for a Basic ACDP.

The facility is also required to calculate and report annually, by February 15th, the amount of chromium VI emitted.

7. **Chromium VI has a very high cancer risk for exposure to relatively small amounts of material. As part of the 2023 permit modification, a chromium VI limit was added to the permit to keep local cancer risk below acceptable levels.**
8. **The facility is not subject to the Plating and Polishing NESHAP WWWWWW (6W) because they use thermal spraying solely to repair surfaces and are therefore exempt per 40 CFR 63.11505(d)(4).**
9. **This modification qualifies as a Category I public notice. No public notice is required.**