



BASIC AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (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:

Scientific Developments, Inc.
175 S. Danebo Avenue
Eugene, OR 97402

INFORMATION RELIED UPON:

Application No.: 69078
Date Received: December 23, 2022 and
January 10, 2023

PLANT SITE LOCATION:

175 S. Danebo Avenue
Eugene, OR 97402

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: October 4, 2002

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director

5-2-23

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	3069

1.0 PERMIT ISSUANCE

- 1.1 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) associated with the SIC code listed on the first page of this permit until this permit expires, is modified, revoked or rescinded, as long as the permittee complies with the conditions of this permit. If there are other emissions activities occurring at the site besides those associated with the SIC code listed on the cover page of this permit, the permittee may be required to obtain a General, Simple or Standard ACDP, if applicable.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. Visible emissions from any air contaminant source must not equal or exceed an average of 20% opacity for a period or periods aggregating more than three minutes in any one hour. [LRAPA 32-010(3)]
 - b. Observations must be recorded at 15-second intervals as specified in LRAPA 32-010(2).
 - c. The visible emissions standard in this condition does not apply to fugitive emissions from the source. [LRAPA 32-010(1)]
- 2.2 Particulate Matter Emissions** Particulate matter emissions from any air contaminant source, other than fuel burning equipment, refuse burning equipment and fugitive emission sources, must not exceed:
- a. 0.14 grains per dry standard cubic foot for sources installed, constructed, or modified on or after June 1, 1970, but prior to April 16, 2015; and [LRAPA 32-015(2)(b)(B)]
 - b. 0.10 grains per dry standard cubic foot for sources installed, constructed, or modified after April 16, 2015. [LRAPA 32-015(2)(c)]
- Particulate matter emissions from any fuel burning equipment sources must not exceed:
- c. 0.14 grains per dry standard cubic foot for sources installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015; and [LRAPA 32-030(1)(b)]

- d. 0.10 grains per dry standard cubic foot for sources installed, constructed, or modified after April 16, 2015. [LRAPA 32-030(2)]

- 2.3 **Fugitive Emissions** The permittee must take reasonable precautions to prevent particulate matter from becoming airborne. [LRAPA 48-015]
- 2.4 **Particulate Matter Fallout** The permittee must not cause or permit the emission of particulate matter larger than 250 microns in size at such 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]

3.0 OPERATION AND MAINTENANCE REQUIREMENTS

- 3.1 **Operation of Pollution Control Devices and Processes** The permittee must operate and maintain air pollution control devices and emission reduction processes at the highest reasonable efficiency and effectiveness to minimize emissions. Air pollution control devices and components must be in operation and functioning properly at all times when the associated emission source is operating. Air pollution control devices include the cyclone and bag filter controlling particulate matter from the reject grinder. [LRAPA 32-007(1)]

4.0 RECORDKEEPING REQUIREMENTS

- 4.1 **Monitoring Requirements** The permittee must monitor and maintain records of the operation and maintenance of the facility as required in Condition 5.2: [LRAPA 34-016(1)]
- 4.2 **Operation and Maintenance** The permittee must maintain all records associated with operation of the facility and associated air pollution control devices, including, but not limited to, safety data sheets (SDS) or certified product data sheets (CPDS) for each coating and material incorporated into finished products, calculations, production records, and maintenance records. [LRAPA 34-016(1)]
- 4.3 **Excess Emissions** The permittee must maintain records of excess emissions as defined in LRAPA Title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. Excess

emissions are evident when visible emissions are greater than 20% opacity for a period or periods aggregating more than three minutes in any one hour. [LRAPA 36-025]

4.4 Complaint log

The permittee must maintain a log of all written complaints and complaints received via telephone, fax, or email that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. [LRAPA 34-016(1)]

4.5 Retention of Records

Unless otherwise specified, all records must be maintained on site for a period of at least five (5) years and must be made available to LRAPA upon request. [LRAPA 34-016(5)]

5.0 REPORTING REQUIREMENTS

5.1 Excess Emissions

The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health. [LRAPA 36-020]

- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 6.2.
- b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
- c. The permittee must also submit follow-up reports when required by LRAPA.

5.2 Annual Report

The permittee must submit to LRAPA by **February 15** of each year this permit is in effect, the following information for the preceding calendar year:
[LRAPA 34-016(2)]

- a. Operating parameters:
 - i. The annual quantity (pounds) of rubber used; and
 - ii. The annual quantity of natural gas (MMscf or therms) combusted in the boilers and thermal oil heater; and

- iii. The annual number of gallons of VOC and/or HAP containing coatings and solvents used.
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by the permittee.
 - d. List of permanent changes made in facility processes and production levels which affected air contaminant emissions.
- 5.3 **Notice of Change of Ownership or Company Name**

The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following: [LRAPA 37-0030(4)]

 - a. Legal change of the name of the company as registered with the Corporation Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 5.4 **Construction or Modification Notices**

The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with LRAPA 34-010 through 34-038 before:

 - a. Constructing, installing, or establishing a new source that will cause an increase in any regulated pollutant emissions; [LRAPA 34-034(1)]
 - b. Making a physical change or change in operation of an existing source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or [LRAPA 34-034(2)]
 - c. Constructing or modifying any air pollution control device. [LRAPA 34-034(3)]
- 5.5 **Where to Send Reports and Notices**

The reports, with the permit number prominently displayed, must be sent to LRAPA as identified in Condition 6.2.

6.0 ADMINISTRATIVE REQUIREMENTS

- 6.1 **Renewal of the Basic Permit**

A complete application for renewal of this permit is due within 30 days prior to expiration. [LRAPA 37-0040(2)(b)(A)]

 - a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee

must comply with the conditions of the permit until such time that the permit is renewed.

- b. The permittee may submit an application for either a General, Simple or Standard ACDP at any time, but the permittee must continue to comply with the Basic ACDP until LRAPA takes final action on the General, Simple or Standard ACDP application.
- c. If a complete application for renewal of the Basic ACDP or a General, Simple or Standard ACDP application is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.

6.2 LRAPA Address and Contact Number All reports, notices, and applications should be directed to the LRAPA office. The LRAPA address is as follows:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

6.3 LRAPA Website Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA web page at www.lrapa.org.

7.0 FEES

7.1 Annual Fees The Annual Fees specified in LRAPA title 37, Section 37-8020, Table 2, Parts 2 and 3 for a Basic ACDP 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.
[LRAPA 37-0056(2)]

7.2 Where to Submit Fees Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

8.0 GENERAL CONDITIONS AND DISCLAIMERS

8.1 Other Regulations In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

- 8.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 8.3 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]
- 8.4 LRAPA Access** 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 ORS 468.095.
- 8.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 8.6 Outdoor Burning** The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.
- 8.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 8.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 8.9 Termination, Revocation, or Modification** LRAPA may terminate, modify or revoke this permit in accordance with LRAPA title 37, Section 37-0082 and Section 37-0084.

9.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSPS	New Source Performance Standard
ASTM	American Society for Testing and Materials	NSR	New Source Review
AQMA	Air Quality Maintenance Area	O ₂	Oxygen
calendar year	The 12-month period beginning January 1st and ending December 31st	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
CO	Carbon monoxide	O&M	Operation and maintenance
DEQ	Oregon Department of Environmental Quality	Pb	Lead
dscf	Dry standard cubic foot	PCD	Pollution control device
EPA	US Environmental Protection Agency	PM	Particulate matter
FCAA	Federal Clean Air Act	PM ₁₀	Particulate matter less than 10 microns in size
gal	Gallon(s)	ppm	Part per million
gr/dscf	Grains per dry standard cubic foot	PSD	Prevention of Significant Deterioration
HAP	Hazardous Air Pollutant as defined by LRAPA title 44	PSEL	Plant Site Emission Limit
ID	Identification number	PTE	Potential to Emit
I&M	Inspection and maintenance	RACT	Reasonably Available Control Technology
lb	Pound(s)	scf	Standard cubic foot
MMBtu	Million British thermal units	SER	Significant Emission Rate
MMscf	Million standard cubic feet	SIC	Standard Industrial Code
NA	Not applicable	SIP	State Implementation Plan
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SO ₂	Sulfur dioxide
NO _x	Nitrogen oxides	Special Control Area	As defined in LRAPA title 29
		VE	Visible emissions
		VOC	Volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Scientific Developments, Inc.
 175 S Danebo Avenue
 Eugene, Oregon 97402
 541-686-9844

Website: <http://plasticade.com/sdi-rubber>

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
February 15	NA	X	NA	NA	Category I

1. The proposed Basic Air Contaminant Discharge Permit (ACDP) is an initial permit for an existing facility. Scientific Developments, Inc. (the facility) manufactures engineered rubber products such as car stops, speed bumps, wheel chocks, and bases for work zone safety products at 175 S Danebo Avenue in Eugene, Oregon.
2. A review of Environmental Protection Agency (EPA) regulated facilities in Lane County revealed that the facility reports small quantities of air emissions to the EPA Toxic Release Inventory (TRI) program. Activities at the facility were assessed for permit applicability, resulting in the proposed Basic ACDP.
3. The permittee manufactures engineered rubber products from rubber crumb and buffings purchased from outside vendors. The rubber crumb and buffings are mixed in batches with a binder and a catalyst in a carrier oil, then placed into molds and cured in a heated press. Color is applied to finished rubber products either by pressing prefabricated strips of coloring to rubber car stops during the molding process, or by surface coating in a spray booth. All raw material is stored inside a building, along with a granulator which grinds reject product for remanufacturing.
4. The facility currently has two (2) shuttle presses for manufacturing rubber car stops and 20 rubber wheel chock presses. The shuttle presses are heated by one (1) 1.7 MMBtu/hr natural gas fired thermal oil heater and the wheel chock presses are heated by four (4) natural gas-fired boilers [two (2) 1.26 MMBtu/hr boilers and two (2) 1.075 MMBtu/hr boilers]. The facility operates one (1) paint booth for surface coating wheel chocks and one (1) granulator equipped with a cyclone and bag filter to control particulate matter emissions from grinding reject

product for remanufacturing. The granulator and cyclone with bag filter are also located inside a building for additional particulate matter control.

5. This facility qualifies for a Basic ACDP because actual emissions of volatile organic compounds (VOC) and/or hazardous air pollutants (HAP) from the facility exceed 1 ton/year but are less than 10 tons/year for each criteria pollutant.
6. The source is not subject to Subpart JJJJJJ, National Emission Standards for Hazardous Air Pollutants (NESHAP) for Industrial, Commercial, and Institutional Boilers Area Sources because the facility operates gas-fired boilers excluded by 40 CFR 63.11195(e).
7. The source is not subject to Subpart Dc, Standards of Performance for Small Industrial Commercial Institutional Steam Generating Units because each of the boilers at the facility are rated at less than 10 MMBtu/hr.
8. The source is located in an attainment area for PM_{2.5}, SO₂, NO₂, VOC (ozone), and Lead (Pb), and in the Eugene Springfield Air Quality Maintenance Area for PM₁₀ and CO.
9. 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.
10. Pursuant to LRAPA 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.

CG:rr
5/1/2023