ASSIGNMENT

to

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

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

PERMITTEE:

Lane Marble Interiors, Inc.
10 West Q Street, Suite D
Springfield, OR 97477

PLANT SITE LOCATION:

Lane Marble Interiors, Inc.
10 West Q Street, Suite D
Springfield, OR 97477

INFORMATION RELIED UPON:

Application No.: 71550
Date Received: 03/10/25

LAND USE COMPATIBILITY STATEMENT:

Approving Authority: City of Springfield
Approval Date: 01/26/2004

ASSIGNMENT: The permittee identified above is assigned by the Lane Regional Air Protection Agency to the General ACDP listed below in accordance with ORS 468A.040, LRAPA Subsection 37-0060(2).

Travis Knudsen, Executive Director

February 13, 2026
Dated

General Air Contaminant Discharge Permit Issued in Accordance with Section 37-0060:

General ACDP Number	Expiration Date	Source Category Description
AQGP-003	01/13/2036	Fiberglass lay-up and/or reinforced plastics composites production
Rule Citation	LRAPA 37-8010, Table 1, Part B, 83	
SIC	3281	Cut stone and stone products
NAICS	327991	Cut stone and stone product manufacturing

SUPPLEMENTAL INFORMATION:

Facility contact:		
Name:	Melanie Leata	
Title:	Bookkeeper	
Phone number:	541-726-3013	
e-mail address:	lanemarble@peak.org	
Permit Summary:		
Source Test Requirement	No	N/A
NSPS (40 CFR Part 60)	No	N/A
NESHAP (40 CFR Part 63)	No	N/A
Reports Required:		
Annual	Yes	February 15
NSPS	No	N/A
NESHAP	No	N/A
Test Results	No	N/A
Public Notice	Category I	
Application review report:		
LRAPA has reviewed the application for assignment to the General ACDP and determined that the application is complete and the subject facility qualifies for assignment to the General ACDP.		

MH 2/11/2026: jm

LANE REGIONAL AIR PROTECTION AGENCY

GENERAL AIR CONTAMINANT DISCHARGE PERMIT

1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056

This permit is being issued in accordance with the provisions of ORS 468A.040.

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Travis Knudsen, Executive Director — Date: 1/13/26

Source(s) Permitted to Discharge Air Contaminants (LRAPA 37-8010):

Table 1 Code	Source Description	SIC
Part B, 83	Fiberglass lay-up and/or reinforced plastics composites production	3083, 3089, 3562, 3823, etc.

TABLE OF CONTENTS

1.0 PERMIT ASSIGNMENT

1.1. Qualifications

The permittee must meet all of the following conditions in order to qualify for assignment to this General Air Contaminant Discharge Permit (ACDP):

a. The permittee is operating fiberglass lay-up and/or reinforced plastics composites production as listed on the cover of this permit, including supporting activities;
b. Actual or expected emissions of any single Hazardous Air Pollutant (HAP) are less than 5.1 tons/year;
c. The permittee is not having ongoing, recurring or serious compliance problems; and
d. A Simple or Standard ACDP is not required for the source.

1.2. Assignment

LRAPA will assign qualifying permittees to this permit that have and maintain a good record of compliance with LRAPA's air quality regulations and that LRAPA determines would be appropriately regulated by a General Air Contaminant Discharge Permit (ACDP). LRAPA may rescind assignment if the permittee no longer meets the requirements of LRAPA 37-0025(2) and LRAPA 37-0060 or the conditions of this permit.

1.3. Permitted Activities

a. Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant source(s) listed on the cover page of this permit, in addition to any categorically insignificant activities, as defined in LRAPA title 12, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is not authorized by this permit. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain an associated General ACDP Attachment, a Simple or Standard ACDP, or a source specific Title V Operating Permit, if applicable.
b. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA, and citizens under the Clean Air Act, except where noted. Those noted conditions are enforceable by only the state.

2.0 RELATION TO LOCAL LAND USE LAWS

2.1. Relation to Local Land Use Laws

This permit is not valid outside of Lane County, or at any location where the operation of the permittee's processes, activities, and insignificant activities would violate any local land use or zoning laws. It is the permittee's responsibility to obtain local land use approvals as, or where, applicable before operating this facility at any location. For operation outside of Lane County, contact the Oregon Department of Environmental Quality for any necessary permits at (503) 229-5359.

3.0 GENERAL EMISSION STANDARDS AND LIMITS

3.1. Visible Emissions

The permittee must comply with the following visible emission limits from air contaminant sources other than fugitive emission sources, as applicable. Opacity must be measured as a six-minute average using EPA Method 9 or an alternative monitoring method approved by LRAPA that is equivalent to EPA Method 9.

a. Emissions from any point source must not equal or exceed 20% opacity. [LRAPA 32-010(3)]

3.2. Fugitive Emissions

The permittee must take reasonable precautions to prevent fugitive dust emissions from leaving the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. [LRAPA 48-015]

a. At least quarterly, the permittee must conduct a six (6) minute visible emission survey of the plant site using EPA Method 22. The person conducting this survey does not have to be EPA Method 9 certified but the individual must be trained and knowledgeable with respect to the general procedures for determining the presence of visible emissions. For purposes of this survey, excessive fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. [LRAPA 32-007(1) and LRAPA 37-0060(1)(b)(C)]
    i. If visible fugitive emissions are detected at the property boundary for more than 5% (18 seconds) of the survey time, the permittee must take corrective action which may include the following:
        A. Applying water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts. Dust suppressant material must not adversely affect water quality;
        B. Requiring slower driving speeds on unpaved roads;
        C. Enclosing (full or partial) materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter, including dust, from becoming airborne; and
        D. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.
    ii. The permittee must record in a log, the results of the EPA Method 22 emission surveys and any corrective actions taken.
b. If requested by LRAPA, the permittee must: [LRAPA 48-015(2)&(3) and 34-016]
    i. Prepare and submit a fugitive emission control plan within 60 days of the request;
    ii. Implement the LRAPA approved plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period; and
    iii. Keep the plan on site and make the plan available upon request.

3.3. Particulate Matter Emissions

The permittee must not allow particulate matter emissions from any point source, other than fuel burning equipment, to exceed 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)(A) and (c)]

3.4. Particulate Matter Fallout

The permittee must not cause or permit the deposition 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] (LRAPA-only enforceable)

3.5. Nuisance and Odors

The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010] (LRAPA-only enforceable)

3.6. Complaint Log

The permittee must maintain a log of all complaints received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution or nuisance concerns associated with the permitted facility. Contact information for the permittee can be found on the Assignment to General Permit sheet. If LRAPA receives any complaints about operation of the assigned source through the LRAPA complaint line, https://www.lrapa-or.gov/air-quality-protection/current-aqi/file-an-air-quality-complaint/ or 541-726-1205, LRAPA will notify the permittee and require the permittee to investigate the complaint and take action for complaint resolution. Documentation of complaints must include: [LRAPA 34-016]

a. The date the complaint was received;
b. The date and time the complaint states the condition was present;
c. A description of the pollution, nuisance, or odor condition;
d. The location of the complainant/exposure location relative to the source location;
e. The status of source operation or activities during the complaint's stated time of pollution, nuisance, or odor condition; and
f. A record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution.

4.0 PLANT SITE EMISSION LIMITS

4.1. Plant Site Emission Limits (PSEL)

The permittee must not cause or allow plant site emissions to exceed the following: [LRAPA 42-0041]

Pollutant	Limit	Units
VOC	5.1	Tons per year

4.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period. [LRAPA 42-0035(4)]

5.0 COMPLIANCE DEMONSTRATION

5.1. VOC PSEL Compliance and HAP Monitoring for Coatings and Solvents

The permittee must calculate the VOC emissions for each 12-consecutive calendar month period, by the end of the 15th day of the following month, based on the following calculation: [LRAPA 42-0080]:

E= VOC from coatings and solvents (See Condition 6.2) + VOC from gelcoats and resins (See Condition 6.3)

5.2. VOCs from Coatings and Solvents

For coatings and solvents, the permittee shall estimate VOC/HAP emissions for each 12-consecutive calendar month period based on the following calculation:

$$E = \Sigma RM \times D \times VOC/HAP \times EF \times K$$

where:

E = VOC and HAP pollutant emissions (tons/year);
Σ = symbol representing summation of;
RM = Raw Material usage in gallons per year;
D = Density of each Raw Material used in pounds per gallon as obtained from the SDS/CPDS;
VOC/HAP = VOC and HAP content of Raw Material by weight fraction as obtained from the SDS/CPDS;
EF = Emission Factor: For all solvent and coating usage, the EF is 1 (assumes 100% emitted); and
K = Conversion Factor Constant: 1 ton per 2000 pounds

5.3. VOCs from Gelcoats and Resins

For gelcoats and resins containing styrene and methyl methacrylate, the permittee shall estimate VOC/HAP emissions in accordance with Appendix A – Emission Factors. These emissions depend on the application method, the material used (e.g., resin or gel coat), and the styrene or methyl methacrylate content of the applied material. Emission rates from these activities must be calculated using the "Unified Emission Factors for Open Molding of Composites" included as Appendix A (Condition 1.0) to this permit.

5.4. Emission Factors

The permittee must use the default emission factors provided in Condition 1.0 for calculating pollutant emissions unless alternative emission factors are approved in writing by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by LRAPA. [LRAPA 42-0080]

5.5. PSEL Compliance Monitoring

The permittee must demonstrate compliance with the PSEL by totaling the emissions from all point sources calculated under Condition 5.2 and 5.3, as applicable, [LRAPA 42-0080]

6.0 RECORDKEEPING REQUIREMENTS

6.1. Recordkeeping

A record of the following data must be maintained for a period of at least five (5) years at the plant site and shall be available for inspection by authorized representatives of LRAPA: [LRAPA 35-0160 and 42-0080]

Facility-Wide Activity	Parameter	Units	Minimum Recording Frequency
VOC-containing Material Usage[1]	Material Usage	gallons	Monthly
VOC-containing Material Usage[1]	Density of Material, per coatings and solvents	pounds/gallon	Maintain current information at all times[2]

Facility-Wide Activity	Parameter	Units	Minimum Recording Frequency
VOC-containing Material Usage[1]	VOC content	% by weight	Maintain current information at all times[2]
Spray Booth maintenance performed	Occurrence	NA	Occurrence
Fuel combustion (e.g., ovens and/or any other stationary fuel burning equipment)	Type and quantity of fuel combusted	Cubic feet, MMBtu, gallons	Monthly

[1]NOTE: Including but not limited to: gel coats, resins and solvents.
[2]NOTE: This information shall be supplied from SDS/CPDS provided by the manufacturer/supplier of the gel coats, resins and solvents

6.2. **Excess Emissions**

a. The permittee must maintain the records of excess emissions listed below and as defined in LRAPA title 36, recorded on occurrence. Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance.
   i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
   ii. The date and time the permittee notified LRAPA of the event;
   iii. The equipment involved;
   iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
   v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
   vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations); and
   vii. The final resolution of the cause of the excess emissions;
b. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees. [LRAPA 36-020]
c. 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 LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
d. If startups or shutdowns may result in excess emissions, the permittee must submit startup/shutdown procedures used to minimize excess emissions to LRAPA for prior

authorization, as required in LRAPA 36-010(2). New or modified procedures must be received by LRAPA 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.

e. The permittee must maintain a log of all excess emissions in accordance with LRAPA 36-025(3).

6.3. **Complaint Log**

To demonstrate compliance with Condition 3.6, the permittee must maintain a log with all the information included in Condition 3.6 for all complaints received by the permittee. [LRAPA 34-016]

6.4. **Retention of Records**

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to LRAPA upon request. The permittee must maintain the two (2) most recent years of records onsite for permanent facilities. The permittee must maintain records at the home office location for a five-year rolling period for portable facilities. [LRAPA 34-016]

7.0 REPORTING REQUIREMENTS

7.1. **Excess Emissions**

a. The permittee must notify LRAPA of excess emissions events if the excess emission is of a nature that could endanger public health. Initial 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 LRAPA by email, telephone, facsimile, or in person.

b. The permittee must also submit follow-up reports summarizing records of excess emissions as required in Condition 6.2 within 15 days of the date of the event. Notice must be made to LRAPA by email, telephone, facsimile, or in person.

7.2. **Annual Report**

a. Each year this permit is in effect, the permittee must submit to LRAPA, by **February 15** one (1) electronic copy of the following information for the previous calendar year: [LRAPA 37-0060(1)(b)(C)]
   i. Annual emissions as calculated according to Condition 5.1.
   ii. Records of all planned and unplanned excess emissions events.
   iii. Summary of complaints relating to air quality received by permittee during the year.
   iv. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
   v. List major maintenance performed on pollution control equipment.

7.3. **Notice of Change of Ownership or Company Name**

The permittee must notify LRAPA in writing using an LRAPA "Transfer 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.

7.4. **Construction or Modification Notices**

The permittee must notify LRAPA in writing using a LRAPA "Notice of Intent to Construct Form," or other permit application form and obtain approval in accordance with LRAPA 34-035 through 34-038 before:

a. Constructing, installing, or establishing a new stationary or portable source that will cause an increase in any regulated pollutant emissions;
b. Making any physical change or change in operation of an existing stationary or portable source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions;
c. Replacement of any new stationary or portable source; or
d. Constructing or modifying any air pollution control equipment.

8.0 ADMINISTRATIVE REQUIREMENTS

8.1. Annual Compliance Fee

The permittee must pay the annual fees specified in LRAPA 37-8020, Table 2, Parts 2 and 3 by **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. Late fees in accordance with Part 5 of the table will be assessed as appropriate.

8.2. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in LRAPA 37-8020, Table 2, Part 4 with an application for changing the ownership or the name of the company.

8.3. Special Activity Fees

The permittee must pay the applicable special activity fees specified in LRAPA 37-8020, Table 2, Part 4 upon invoicing by LRAPA.

9.0 LRAPA ADDRESS

9.1. LRAPA Addresses

The permittee must submit all reports, notices, applications, and fees to LRAPA as follows:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, Oregon 97477
(541) 736-1056
permitting@lrapa-or.gov

9.2. Web Site

Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA web page at https://www.lrapa-or.gov.

10.0 GENERAL CONDITIONS AND DISCLAIMERS

10.1. Other Regulations

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

10.2. Conflicting Conditions

In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. [LRAPA 12-001]

10.3. 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] (LRAPA-only enforceable)

10.4. 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.

10.5. Permit Availability

The permittee must have a copy of the permit available at the facility at all times. [LRAPA 37-0020(3)]

10.6. Outdoor Burning

The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.

10.7. Asbestos [40 C.F.R. Part 61, Subpart M (not LRAPA-enforceable), LRAPA title 43 (LRAPA-only enforceable)]

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.

10.8. 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.

10.9. Permit Termination, Revocation, or Modification

LRAPA may terminate, revoke, or modify this permit pursuant to LRAPA title 37. [LRAPA 37-0082]

11.0 EMISSION FACTORS

a. The emission factors below are from the "American Composites Manufacturers Association".

EF Table 1: Unified Emission Factors for Open Molding of Composites

Revised and Approved: 10/13/ 2009

Emission Rate in Pounds of Styrene Emitted per Ton of Resin or Gelcoat Processed

Application Process	Styrene content in resin/gelcoat, % [1]	<33 [2]	33	34	35	36	37	38	39	40	41	42	43	44	45	46	47	48	49	50	>50 [2]
	Manual	0.126 x %styrene x 2000	83	89	94	100	106	112	117	123	129	134	140	146	152	157	163	169	174	180	((0.286 x %styrene) - 0.0529) x 2000
	Manual w/ Vapor Suppressed Resin VSR [3]	**Manual emission factor** [listed above] x (1 - (0.50 x specific VSR reduction factor for each resin/suppressant formulation))																			
	Mechanical Atomized	0.169 x %styrene x 2000	111	126	140	154	168	183	197	211	225	240	254	268	283	297	311	325	340	354	((0.714 x %styrene) - 0.18) x 2000
	Mechanical Atomized with VSR [3]	**Mechanical Atomized emission factor** [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
	Mechanical Atomized Controlled Spray [4]	0.130 x %styrene x 2000	86	97	108	119	130	141	152	163	174	185	196	207	218	229	240	251	262	273	0.77 x ((0.714 x %styrene) - 0.18) x 2000
	Mechanical Controlled Spray with VSR	**Mechanical Atomized Controlled Spray emission factor** [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
	Mechanical Non-Atomized	0.107 x %styrene x 2000	71	74	77	80	83	86	89	93	96	99	102	105	108	111	115	118	121	124	((0.157 x %styrene) - 0.0165) x 2000
	Mechanical Non-Atomized with VSR [3]	**Mechanical Non-Atomized emission factor** [listed above] x (1 - (0.45 x specific VSR reduction factor for each resin/suppressant formulation))																			
	Mechanical Non-Atomized Application of Resins That Contain Methyl Styrene Monomer [10]	**Mechanical Non-Atomized Styrene Monomer EmissionsFactor (listed above) x 0.55**																			
	Mechanical Non-Atomized Filled DCPD Resins [11]	0.144 x %styrene x 2000	95	98	101	104	108	111	114	117	120	124	127	130	133	135	140	143	145	149	((0.1603 x %styrene) - 0.0055) x 2000
	Filament application	0.184 x %styrene x 2000	122	127	133	138	144	149	155	160	166	171	177	182	188	193	199	204	210	215	((0.2746 x %styrene) - 0.0298) x 2000
	Filament application with VSR [3]	0.120 x %styrene x 2000	79	83	86	90	93	97	100	104	108	111	115	118	122	125	129	133	136	140	0.65 x ((0.2746 x %styrene) - 0.0298) x 2000
	Gelcoat Application	0.445 x %styrene x 2000	294	315	336	356	377	398	418	439	460	481	501	522	543	564	584	605	626	646	((1.03646 x %styrene) - 0.195) x 2000
	Gelcoat Controlled Spray Application [4]	0.325 x %styrene x 2000	215	230	245	260	275	290	305	321	336	351	366	381	396	411	427	442	457	472	0.73 x ((1.03646 x %styrene) - 0.195) x 2000
	Gelcoat Non-Atomized Application [8]	SEE **Note 9** below	196	205	214	223	232	241	250	259	268	278	287	296	305	314	323	332	341	350	((0.4506 x %styrene) - 0.0505) x 2000
	Lesser Atomized Gelcoat Application [12]	for < 30 : 0.323 x %styrene x 2000																			
	Covered-Cure after Roll-Out	**Non-VSR process emission factor** [listed above] x (0.80 for Manual <or> 0.85 for Mechanical)																			
	Covered-Cure without Roll-Out	**Non-VSR process emission factor** [listed above] x (0.50 for Manual <or> 0.55 for Mechanical)																			

Emission Rate in Pounds of Methyl Methacrylate Emitted per Ton of Gelcoat Processed

MMA content in gelcoat, % [6]	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	≥20
Gel coat application [7]	15	30	45	60	75	90	105	120	135	150	165	180	195	210	225	240	255	270	285	0.75 x %MMA x 2000

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, fillers, glass,...etc.
2. Formulas for materials with styrene content < 33% are based on the emission rate at 33% (constant emission factor expressed as percent of available styrene), and for styrene content > 50% on the emission rate based on the extrapolated factor equations; these are not based on test data but are believed to be conservative estimates. The value for "% styrene" in the formulas should be input as a fraction. For example, use the input value 0.30 for a resin with 30% styrene content by wt.
3. 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. The effect of vapor suppressants on emissions from filament winding operations is based on the ***Dow Filament Winding Emissions Study.***
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.
7. Based on gelcoat data from ***NMMA Emission Study.***
8. SEE the July 17, 2001 EECS report ***Emission Factors for Non-Atomized Application of Gel Coats used in the Open Molding of Composites*** for a detailed description of the non-atomized gelcoat testing.
9. Use the equation **((0.4506 x %styrene) - 0.0505) x 2000** for gelcoats with styrene contents between 19% and 32% by wt.; use the equation **0.185 x %styrene x 2000** for gelcoats with less than 19% styrene content by wt.
10. Refer to section 3.0. Instructionand Examples for the Emission Factor table. 3.2 Calculation of the methyl styrene factor
11. Use this factor for the non-atomized application of DCPD or DCPD-blend resin, when filled to 30% or more by weight
12. Table from 30% TO 32% styrene content:

30	31	32
194	206	217

12.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit
ACI	Air curtain incinerator
ARB	Air Resources Board
ASTM	American Society for Testing and Materials
AQMA	Air Quality Maintenance Area
calendar year	The 12-month period beginning January 1st and ending December 31st
CAO	Cleaner Air Oregon
CAS	Chemical Abstracts Service
C.F.R.	Code of Federal Regulations
CI ICE	Compression Ignition Internal Combustion Engine
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
DEQ	Oregon Department of Environmental Quality
DPF	diesel particulate filter
dscf	dry standard cubic foot
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
Gal	gallon(s)
GHG	greenhouse gas
gr/dscf	grains per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040
I&M	inspection and maintenance
lb(s)	pound(s)
LRAPA	Lane Regional Air Protection Agency
Mgal	Thousand gallons
MMBtu	million British thermal units
NA	not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_X	nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O_2	oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	operation and maintenance
PAHs	polycyclic aromatic hydrocarbons
Pb	lead
PCD	pollution control device
PEMS	Predictive emission monitoring system
PM	particulate matter
PM_{10}	particulate matter less than or equal to 10 microns in size
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in size
ppm	part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
QR	Quick response
RACT	Reasonably Available Control Technology
scf	standard cubic foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO_2	sulfur dioxide
TACT	Typically Achievable Control Technology
USDA	United States Department of Agriculture
VE	visible emissions
VOC	volatile organic compound
year	A period consisting of any 12-consecutive calendar months

GENERAL AIR CONTAMINANT DISCHARGE PERMIT ASSESSMENT REPORT

FIBERGLASS LAY-UP AND/OR REINFORCED PLASTIC COMPOSITES PRODUCTION

Lane Marble Interiors, Inc.
Source No. 204747
10 West Q Street, Suite D
Springfield, OR 97477

SIC	3281
NAICS	327991

Source Categories (Table 1 Part, code)	B.83
Public Notice Category	Category I

Compliance and Emissions Monitoring Requirements:

FCE		Source test	
Compliance schedule		COMS	
Unassigned emissions		CEMS	
Emission credits		PEMS	
Special Conditions		Ambient monitoring	

Reporting Requirements

Annual report (due date)	X (Feb 15)	Monthly report (due dates)	
Quarterly report (due dates)		Excess emissions report	
		Other (specify)	

Air Programs

Synthetic Minor (SM)		PSD	
SM -80		GHG	
NSPS (list subparts)		RACT	
NESHAP (list subparts)		TACT	
CAO		Other (specify)	
NSR			

TABLE OF CONTENTS

LIST OF ABBREVIATIONS USED IN THIS ASSESSMENT REPORT

ACDP	Air Contaminant Discharge Permit
AQMA	Air Quality Management Area
ASTM	American Society of Testing and Materials
BDT	bone dry ton
CAO	Cleaner Air Oregon
CEMS	continuous emissions monitoring system
C.F.R.	Code of Federal Regulations
CH_4	methane (greenhouse gas)
CMS	continuous monitoring system
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
COMS	continuous opacity monitoring system
DEQ	Oregon Department of Environmental Quality
DPF	diesel particulate filter
dscf	dry standard cubic feet
EF	emission factor
EPA	United State Environmental Protection Agency
EU	emissions unit
FCAA	Federal Clean Air Act
FCE	Full Compliance Evaluation
GHG	greenhouse gas
gr/dscf	grains per dry standard cubic feet
HAP	hazardous air pollutant
ID	identification code
I&M	inspection and maintenance
LRAPA	Lane Regional Air Protection Agency
MB	material balance
Mlb	1000 pounds
MM	million
N_2O	nitrous oxide (greenhouse gas)
NA	not applicable
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO_x	oxides of nitrogen
NSPS	New Source Performance Standard
NSR	New Source Review
O_2	oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	operation and maintenance
Pb	lead
PCD	pollution control device
PEMS	predictive emissions monitoring system
PM	particulate matter
PM_{10}	particulate matter less than or equal to 10 microns in size
$PM_{2.5}$	particulate matter less than or equal to 2.5 microns in size
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
SO_2	sulfur dioxide
ST	source test
TACT	Typically Achievable Control Technology
VE	visible emissions
VMT	vehicle mile traveled
VOC	volatile organic compound

SOURCE DESCRIPTION AND QUALIFICATION

1. This General Permit is designed to regulate air contaminant emissions from sources with activities involving fiberglass lay-up and/or reinforced plastics composite production. The category and permit is intended to regulate emissions from minor sources of Hazardous Air Pollutants (HAPs) – particularly styrene. Emissions of Volatile Organic Compounds (VOCs) are also regulated by the permit.
2. This General Permit does not apply to:
   a. Process units that are subject to the requirements of any major source NESHAP; or
   b. Any facility with actual or expected annual emissions that equal or exceed 5.1 tons/year of any single HAP (i.e., >50% of the major source single HAP threshold).
3. A facility assigned to this General Permit:
   a. May not emit any other air pollution that requires regulation beyond that specified in this permit, except for other pollution emissions that also qualify for assignment, and are assigned, to other General Permits and categorically insignificant activities defined by LRAPA title 12; or
   b. May not experience reoccurring or serious compliance problems, which would make that facility ineligible for assignment to this General Permit.
4. If this General Permit does not cover all requirements applicable to the facility, the other applicable requirements must be covered by assignment to one or more General Permit Attachments in accordance with LRAPA 37-0062, otherwise the facility must obtain a source specific Simple or Standard ACDP. A facility requesting to be assigned to a General Permit Attachment, in accordance with LRAPA 37-0062, for a source category in a higher annual fee class, must be reassigned to the General Permit for the source category in the higher annual fee class.

SIC Code*	**Description**	**NAICS Code**	**Description**
3083	Laminated Plastics Plate, Sheet, and Profile Shapes	326130	Laminated Plastics Plate, Sheet (except Packaging), and Shape Manufacturing
3089	Plastics Products, Not Elsewhere Classified	326121	Unlaminated Plastics Profile Shape Manufacturing
		326122	Plastics Pipe and Pipe Fitting Manufacturing
		326199	All Other Plastics Product Manufacturing
		336612	Boat Building
		337215	Showcase, Partition, Shelving, and Locker Manufacturing
		339113	Surgical Appliance and Supplies Manufacturing
3562	Ball and Roller Bearings	332991	Ball and Roller Bearing Manufacturing

SIC Code*	Description	NAICS Code	Description
3823	Industrial Instruments for Measurement, Display, and Control of Process Variables; and Related Products	334513	Instruments and Related Products Manufacturing for Measuring, Displaying, and Controlling Industrial Process Variables

*Note: May include other SIC codes that are not listed in the table. SIC codes may be used to determine regulatory applicability. NAICS codes alone cannot be used to determine applicability for Oregon sources.

FACILITY IDENTIFICATION

5. The permittee is Lane Marble Interiors, Inc., 10 West Q Street, Suite D, Springfield, OR 97477. The current site contact person is Melanie Leata, Bookkeeper, who can be reached at (541) 726-3013.
6. Lane Marble Interiors, Inc. ("Lane Marble", "the facility", "the permittee") operates a custom cultured marble operation at 10 West Q Street, Suite D, Springfield, OR 97477.

ASSESSMENT OF EMISSIONS

7. Facilities assigned to AQGP-003 are sources of particulate matter (PM), VOCs, Toxic Air Contaminant, and Hazardous Air Pollutant emissions. For the purpose of compliance with the Plant Site Emission Limits (PSELs) facilities are required to estimate VOC and HAP emissions. PM emissions are expected to be de minimis and a PSEL for PM has not been established.
8. LRAPA has assessed the level of emissions of all air pollutants from these facilities and determined that facilities complying with the operational limits and monitoring requirements of this permit have emission levels below the Significant Emission Rates listed in LRAPA Title 12.
9. CAO Risk Screening. LRAPA performs a generalized risk screening for some General ACDPs upon renewal. For the purposes of AQGP-003, LRAPA staff looked at the reported emissions from all sources currently assigned to AQGP-003 as well as their building areas estimated from aerial images which were used in the Level 1 Risk Assessment Tool.
    a. LRAPA assumed the following:
        A. Emissions are conservatively emitted from a 14,000 square foot building area for a relatively small emission footprint of all sources currently assigned to AQGP-003.
        B. The highest calendar year emission rate since 2015 for the 'largest' source currently assigned to this General ACDP was used, and increased by 25% to allow for a reasonable amount of growth.
        C. 50 meters to exposure location (the default distance used for General Permit screening exercises).
10. Risks for all exposure scenarios were estimated to be well below Source Permit Levels in the OAR 340 division 245 Cleaner Air Oregon rules.

11. Actual emissions from this facility since 2015 are estimated to be:

Lane Marble Interiors, Inc.		2015	2016	2017	2018	2022	2023	2024
Styrene	lbs	2,610	2,610	2,610	3,497	3,431	3,524	3,611
	tons	1.30	1.30	1.30	1.75	1.72	1.76	1.81
Methyl Methacrylate	lbs	0	0	0	0	0	0	0
	tons	0.00	0.00	0.00	0.00	0.00	0.00	0.00

EMISSIONS

12. Proposed PSEL information:

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis Proposed (tons/yr)	Plant Site Emission Limits (PSEL) Proposed PSEL (tons/yr)
VOC	NA	0	5.1

a. Because these sources will be constructed after the baseline periods listed in LRAPA 42-0048, they have no baseline emission rate.
b. The netting basis is zero for sources that first obtained a permit after the baseline period and have not undergone NSR in accordance with LRAPA 42-0046(2)(c)(A).
c. For General Permits, the proposed PSEL is set based upon the highest emitting year from the largest emitting source currently assigned to this General ACDP and increased by 25% to allow a reasonable amount of growth over the permit term. The VOC PSEL is set below the 40 ton/year Significant Emission Rate (SER).
d. The basis for the PSEL is included in the emission detail sheets in Attachment A of this Assessment Report.
e. The PSEL is a federally enforceable limit on the potential to emit.

COMPLIANCE ASSURANCE

13. Facilities assigned to this General ACDP are required to maintain records of notifications, production, compliance, work practice activities, and complaints received at the facility for a period of at least five (5) years. These items are reported to LRAPA annually, as applicable.
14. LRAPA staff members review annual report submittals and perform site inspections of the permitted facilities on a routine basis; inspections may be performed more frequently if complaints are received.

REVOCATION OF ASSIGNMENT

15. Any facility that fails to demonstrate compliance or fails to conform to the requirements and limitations contained in the permit may have its assignment to the General Permit revoked. The facility would then be subject to a more stringent level of permitting under

a source-specific Simple or Standard ACDP.

PUBLIC NOTICE

16. General Air Contaminant Discharge Permits are authorized by LRAPA Rules & Regulations and are part of the State Implementation Plan. As part of the General ACDP issuance process under LRAPA title 31, a new General ACDP requires public notice as a Category III permit action LRAPA 37-0060(1)(c).
17. Pursuant to LRAPA 37-0060(1)(c), issuance of a General Air Contaminant Discharge Permit requires public notice in accordance with LRAPA 31-0030(3)(c), which requires LRAPA to provide notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments.
18. The public notice was mailed/emailed on November 24, 2025 and the comment period ended on December 29, 2025.
19. LRAPA did not receive written requests for a hearing from ten persons or from an organization representing at least ten persons, within 35 days of the mailing of the public notice. Therefore, no hearing was scheduled.
20. LRAPA did not receive any written comments during the public notice period.

AQGP-003r, Fiberglass Lay-up and/or Reinforced Plastic Composite Production
MH 1/21/26