

**LANE REGIONAL AIR PROTECTION AGENCY**

1010 Main Street, Springfield, Oregon 97477

(541) 736-1056

**SIMPLE**  
**AIR CONTAMINANT DISCHARGE PERMIT (Simple-ACDP)**

Issued in accordance with provisions of Title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:

**Oregon Rubber Company, DBA  
Oregon Tread Rubber Co. & Wyatt's Tire Company**  
3595 West First Avenue and 68 Wallis Street  
Eugene, OR 97402

Information Relied Upon:

Application Number: 63345  
Dated: November 20, 2017

Mailing Address:

3595 West First Avenue  
Eugene, OR 97402

Land Use Compatibility Statement:

From: City of Eugene  
Date: June 16, 2011

Permit Number: 206127

Permit Type: Simple "Low"

SIC: 2822 Synthetic Rubber,  
7534 Recapping and Retreading tires

Date Renewed: February 15, 2019

Expiration Date: February 15, 2024

Fee Basis:

Title 37, Table 1, B.71:  
Tire Manufacturing

Permitted Sources:

Tire Tread Manufacturing  
Tire Retreading

Issued

By: \_\_\_\_\_

  
Merlyn L. Hough, Director

Effective

Date: \_\_\_\_\_

FEB 15 2019

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge exhaust gases containing contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

Emission Unit Description

2. The emission units (EUs) regulated by this permit are the following:

EU ID	Emission Unit (EU)	Control Device (ID)
#1A	Rubber Mixing and Milling	Baghouse (#7)
#2B	Rubber Extrusion	NA
#3C	Rubber Tread Presses (12)	NA
#4D	Tread Grinding (Sides and Back)	Electrostatic Precipitator (ESP) /Bag filter (#8)
#5E	Rubber Cement Glue Applicator	NA
#6F	2.1 MMBtu/hr Natural Gas-fired Boiler	NA
#7G	Tire Buffing and Painting	Electrostatic Precipitator (ESP) /Bag filter (#8)
#8H	Various Tire Retreading Activities (including tire curing emissions along with adhesive and solvent usage)	

General Emission Limits

3. The permittee must ensure that emissions of any air contaminant source do not equal or exceed 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(2)]
4. The permittee must ensure that particulate matter emissions from any air contaminant source installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015, other than fuel burning equipment and fugitive emissions, do not exceed 0.14 grains per dry standard cubic foot (dscf). [LRAPA 32-015(2)(b)(B)]
5. The permittee must ensure that particulate matter emissions from any fuel burning equipment installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 must not exceed 0.14 grains per dry standard cubic foot (dscf) corrected to 12% CO<sub>2</sub> or 50% excess air. [LRAPA 32-030(1) and (3)]

6. The permittee must conduct dust suppression measures such as, but not limited to, cleaning around bins and equipment and must operate all air contaminant generating processes so that fugitive dust associated with the operation will be adequately controlled at all times. [LRAPA 48-015]
7. All plant process equipment and all air contaminant collection and disposal facilities, including but not limited to the electrostatic precipitator and baghouses must be operated and maintained at all times in a manner which minimize air contaminant discharges. [LRAPA 32-005]

Plant Site Emission Limits (PSELs)

8. The total emissions from all sources located at the plant must not exceed the 12-month rolling limits below. Calculation details are found in the attachment to the Review Report. [LRAPA 42-0040, 42-0060]

**Annual Plant Site Emission Limits (PSELs)**  
 (tons per year)

Source	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	Single Hap	Total HAP	VOC
Facility-wide Tire and Tread Manufacturing	24	14	9	9	24	39

9. The annual plant site emission limits apply to any 12 consecutive calendar month period.

PSEL Monitoring

10. **By the last working day of each month**, the permittee must determine compliance with the 12-month rolling VOC and HAP(s) PSELs in accordance with the following procedures. [LRAPA 42-0080]
  - 10.a. The 12-month rolling total for VOC/HAP for the rubber cement glue and clean-up solvent used in EU #5E must be determined by summing the total VOC or HAP(s) emissions from the previous 12 months. All of the VOC or HAP content of the coatings is assumed to be emitted to the atmosphere. The permittee must maintain usage records of all materials used in EU-#5E that contain VOC and HAP(s) in accordance with Condition 12 and calculate emissions using the following equation:

$$E = \sum_{i=1}^{12} \frac{RM_i \cdot D \cdot W\%}{K}$$

- where: E = VOC/HAP emissions in tons per year;  
 Σ = Symbol representing "summation of";  
 RM = Raw material usage in gallons per month;

- i = Month, beginning with the most recent, summing for 12 preceding, consecutive calendar months;
- D = Density of each VOC/HAP-containing raw material used in pounds per gallon as obtained from the SDS/CPDS;
- W% = VOC/HAP content of Raw Material by weight percent as obtained from the SDS/CPDS;
- K = Conversion factor of 2000 pounds per 1 ton.

10.b. The 12-month rolling total for emissions from EUs #1A, #2B, #3C, #4D, #7G and #8H must be determined by summing the total PM/PM<sub>10</sub>/PM<sub>2.5</sub>, VOC or HAP(s) emissions from the previous 12 months. The permittee must maintain usage records of all materials that contain VOC and HAP(s) in accordance with Condition 12 and calculate emissions using the following equation:

$$E = \sum_{i=1}^{12} \frac{EF \cdot P_i}{2000}$$

where,

- E = Emissions in tons/year;
- Σ = Symbol representing "summation of";
- i = Month, beginning with the most recent, summing for 12 preceding, consecutive calendar months;
- EF = Pollutant emission factor (see Condition 11);
- P = Process production or parameter (see Condition 12)

11. The permittee must use the following emission factors for calculating pollutant emissions, unless alternative emission factors are approved 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]

Emission Unit	Pollutant	Emission Factor <sup>2</sup> (EF)	EF Units
#1A - Rubber Milling and Mixing	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	2.00E-05	lb/lb rubber
	VOC	3.86E-05	
	Single HAP <sup>1</sup>	3.83E-06	
	HAPs	4.87E-05	
#2B – Rubber Extrusion	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	7.77E-09	
	VOC	1.23E-05	
	Single HAP <sup>1</sup>	2.66E-07	
	HAPs	3.52E-05	
#3C Tread Presses	VOC	4.04E-04	
	Single HAP <sup>1</sup>	5.35E-04	

	HAPs	7.23E-04	
#4D – Grinding (Carcass and Retread)	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	5.45E-04	
	VOC	5.21E-04	
	Single HAP <sup>1</sup>	2.58E-06	
	HAPs	1.27E-04	
#5E – Rubber Cement Glue Applicator	VOC	Use SDS	lb/lb glue
	Single HAP <sup>1</sup>	Use SDS	
	HAPs	Use SDS	
#5E – Clean-Up Solvent	VOC	Use SDS	lb/lb solvent
#7G – Tire Buffing and Painting	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	5.73E-05	lb/tire
#8H – Various Tire Retreading Activities	VOC	0.0894	
	Single HAP <sup>1</sup>	2.70E-04	
	HAPs	2.23E-03	

<sup>1</sup> Carbon Disulfide is the highest single HAP.

Recordkeeping Requirements

12. The permittee must monitor and maintain records for a period of five (5) years from the date of entry of the following information: [LRAPA 34-016, 42-0080]

Activity	Parameter	Units	Recording Frequency
Rubber Milling	Material Throughput	Pounds	Monthly
Rubber Extrusion	Material Throughput	Pounds	Monthly
Tread Pressing	Material Throughput	Pounds	Monthly
Rubber Grinding/Buffering	Material Throughput	Pounds	Monthly
Tire Retreading	Tires Retreaded	Tires	Monthly
VOC/HAP-containing Material Usage <sup>1</sup>	Material Usage	Gallons	Monthly
VOC/HAP-containing Material Usage <sup>1</sup>	Density of Material	Pounds per Gallon	Maintain current information at all times <sup>2</sup>
VOC-containing Material Usage <sup>1</sup>	VOC Content	% By Weight	Maintain current information at all times <sup>2</sup>
HAP-containing Material Usage <sup>1</sup>	HAP Content	% By Weight	Maintain current information at all times <sup>2</sup>

<sup>1</sup>NOTE: Including but not limited to: adhesives, thinners, solvents, cleaning, and wash-off materials.

<sup>2</sup>NOTE: This information must be supplied from a Safety Data Sheet (SDS) or Certified Product Data Sheet provided by the manufacturer/supplier of the coatings or solvents.

Reporting Requirements

13. An annual report to document compliance with the PSELs must be submitted. The reports must document any new VOC/HAP-containing raw materials used by the facility and must provide updated or new Safety Data Sheets or Certified Product Data Sheets, as necessary. The reports must include the information required per Conditions 10, 12, and G15.

The annual report is due **February 15<sup>th</sup>** of each year. [LRAPA 34-016 and 42-0080]

14. Unless otherwise specified, all reports, test results, and notifications required by the above terms and conditions must be reported to the following office: [LRAPA 34-016]

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

Fee Schedule

15. In accordance with adopted regulations, the permittee will be invoiced for the annual permit fee by **October 1<sup>st</sup>** with the fees due on **December 1<sup>st</sup>** of each year. [37-8020 Table 2]

Cnc/cmw  
02/15/2019

Abbreviations, Acronyms and Definitions

ACDP	Air Contaminant Discharge Permit
ASTM	American Society for Testing and Materials
AQMA	Air Quality Maintenance Area
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO <sub>2e</sub>	Carbon dioxide equivalent
DEQ	Oregon Department of Environmental Quality
dscf	Dry standard cubic foot
EPA	United States Environmental Protection Agency
FCAA	Federal Clean Air Act
ft <sup>2</sup>	Square foot
GHG	Greenhouse gases
gr/dscf	Grains per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44
I&M	Inspection and maintenance
lb	Pound(s)
LRAPA	Lane Regional Air Protection Agency
N/A	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O <sub>2</sub>	Oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
PCD	Pollution control device
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in size
PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
ppm	Part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
scf	Standard cubic foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
TACT	Typically Achievable Control Technology
VE	Visible emissions
VOC	Volatile organic compound
year	A period consisting of any 12- consecutive calendar months

## **GENERAL PERMIT CONDITIONS**

### General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [LRAPA 37-0020(3)]
- G2. The permittee must allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. 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.

### Performance Standards and Emission Limits

- G4. The permittee must not cause or permit the deposition of any particulate matter which is larger than 250 microns in size at sufficient duration and quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]
- G5. The permittee must not discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090(1)]
- G6. The permittee must not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]
- G7. The permittee must not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 32-050(1)]
- G8. The permittee must not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050(2)]
- G9. The permittee must not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(1)]
- G10. The permittee may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause nuisance. [LRAPA 49-010(1)]

### Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition, including but not limited to excess emissions



resulting from the breakdown of air pollution control devices or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSPS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [LRAPA 36-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply: [LRAPA 36-020(1)]
- a. The owner or operator, of a small source, as defined by LRAPA 36-005(7), need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health.
  - b. Notification must be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.
  - c. Follow-up reporting, if required by LRAPA, must contain all information required by Condition G15.
- G13. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee must submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)(a)]
- G14. Any excess emissions which could endanger public health or safety must immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee must keep an upset log of all planned and unplanned excess emissions. The upset log must include the following: [LRAPA 36-025(3) and 36-030(1)]
- a. date and time each event was reported to LRAPA;
  - b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  - c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;
  - d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
  - e. final resolution of the cause of the excess emissions.

Upset logs must be kept by the permittee for five (5) calendar years. [LRAPA 36-025(3)]

Excess Emissions: Scheduled Maintenance

- G16. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution

control devices may result in excess emissions, the permittee must obtain prior LRAPA authorization of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. The application must include the following: [LRAPA 36-015(1)]

- a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
  - b. identification of the specific production or emission control device or system to be maintained;
  - c. identification of the nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and
  - d. identification of specific procedures to be followed which will minimize excess emissions at all times during the scheduled maintenance.
- G17. No scheduled maintenance associated with the approved procedures in Condition G16 that is likely to result in excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as PM<sub>2.5</sub> or PM<sub>10</sub> nonattainment areas. [LRAPA 36-015(6)]
- G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-015(3), the permittee must immediately notify LRAPA by telephone of the situation, and must be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(7)]

#### Air Pollution Emergencies

- G19. The permittee must, upon declaration of an air pollution alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittees responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

#### Notification of Construction/Modification

- G20. The permittee must notify LRAPA in writing using an LRAPA "Notice of Intent to Construct" form, or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:
- a. constructing, installing or establishing a new stationary source that will cause an increase in regulated pollutant emissions

- b. making any physical change or change in the operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. constructing or modifying any pollution control equipment.

#### Notification of Name Change

- G21. The permittee must notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon. [LRAPA 37-0030(4)]

Applicable administrative fees must be submitted with an application for the name change.

#### Permit Renewal

- G22. Application for renewal of this permit must be submitted not less than 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDP. [LRAPA 37-0040(2)(b)]
- G23. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit: [LRAPA 37-0082(1)(a)]
- a. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or
  - b. Another type of permit, ACDP or Title V, has been issued authorizing operation of the source.
- G24. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)]
- G25. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [LRAPA 37-0040(4)]

#### Termination Conditions

- G26. This permit will be automatically terminated upon: [LRAPA 37-0082(2)]
- a. Issuance of a renewal or new ACDP for the same activity or operation;
  - b. Written request of the permittee, if LRAPA determines that a permit is no longer required;
  - c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or;
  - d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.
- G27. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any applicable rule or statute, LRAPA may revoke the permit. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a

contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee, and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60th day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]

- G28. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three months of the permit expiration date. [LRAPA 37-0082(3)]
- G29. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided under LRAPA Title 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A permittee's written request for hearing must be received by LRAPA within 90 days of service of the notice on the permittee and must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]
- G30. Any hearing requested must be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

#### Asbestos

- G31. 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. [LRAPA Title 43]

[Revised 1/12/2018]