



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:

Robert and Sons Fine Cabinetry, Inc.
3766 West 11th Avenue
Eugene, OR 97402

INFORMATION RELIED UPON:

Application No.: 68449
Date Received: June 3, 2022

PLANT SITE LOCATION:

3766 West 11th Avenue
Eugene, OR 97402

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: May 3, 2012

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director

9-12-22

Dated

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

Table 1 Code	Source Description	SIC
Part A, 7	Surface coating operations whose actual or expected usage of coating materials is greater than 250 gallons per year, but less than 250 gallons/month, excluding sources that exclusively use non-VOC and non-HAP containing coatings.	3577

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air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded, as long as the permittee complies with the conditions of this permit.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 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 Production Limits**
- a. The permittee is prohibited from using 250 gallons or more of any VOC-containing coating materials in a calendar month without first notifying LRAPA.
 - b. The permittee is prohibited from producing more than 25,000 board feet of finished product per 8-hour input without first notifying LRAPA.
- 2.2 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 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)]
- 2.3 Particulate Matter Emissions** Particulate matter emissions from any air contaminant source, other than fugitive emission sources, must not exceed:
- a. 0.14 grains per dry standard cubic foot for sources installed, constructed or modified prior to April 16, 2015; and [LRAPA 32-015(2)(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)]

- 2.4 Fugitive Emissions** The permittee must take reasonable precautions for preventing fugitive dust emissions. [LRAPA 48-015]
- 2.5 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]
- 2.6 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 equipment 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 sources are operating. [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 continuous monitoring data, including, but not limited to, safety data sheets (SDS) or certified product data sheets (CPDS) for each coating material, 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 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, two (2) copies of the following information for the preceding calendar year: [LRAPA 34-016(2)]
- a. Operating parameters:
 - i. Gallons of VOC-containing coatings used during the previous year; and
 - ii. Maximum quantity of lumber (board feet) input in an 8-hour period; and
 - iii. Board feet of lumber produced during the previous year; and
 - iv. Dates and descriptions of all maintenance performed on the paint booth, including filter changes.

- b. Records of all planned and unplanned excess emissions events.
- c. Summary of complaints relating to air quality received by the permittee during the year.
- d. List of permanent changes made in facility processes, production levels, and pollution control equipment which affected air contaminant emissions.
- e. List of major maintenance performed on pollution control equipment.

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 or installing any new source of air contaminant emissions, including air pollution control equipment;
- b. Modifying or altering an existing source that may significantly affect the emission of air contaminants;
- c. Making any physical change which increases emissions; or
- d. Changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation that result in increased emissions.

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	NSR	New Source Review
ASTM	American Society for Testing and Materials	O ₂	Oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
calendar year	The 12-month period beginning January 1st and ending December 31st	ORS	Oregon Revised Statutes
CFR	Code of Federal Regulations	O&M	Operation and maintenance
CO	Carbon monoxide	Pb	Lead
DEQ	Oregon Department of Environmental Quality	PCD	Pollution control device
dscf	Dry standard cubic foot	PM	Particulate matter
EPA	US Environmental Protection Agency	PM ₁₀	Particulate matter less than 10 microns in size
FCAA	Federal Clean Air Act	ppm	Part per million
gal	Gallon(s)	PSD	Prevention of Significant Deterioration
gr/dscf	Grains per dry standard cubic foot	PSEL	Plant Site Emission Limit
HAP	Hazardous Air Pollutant as defined by LRAPA title 44	PTE	Potential to Emit
ID	Identification number	RACT	Reasonably Available Control Technology
I&M	Inspection and maintenance	scf	Standard cubic foot
lb	Pound(s)	SER	Significant Emission Rate
MMBtu	Million British thermal units	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
NSPS	New Source Performance Standard	VE	Visible emissions
		VOC	Volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

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 9/12/2022



Lane Regional Air Protection Agency

BASIC AIR CONTAMINANT DISCHARGE PERMIT REVIEW REPORT

Roberts and Sons Fine Cabinetry, Inc.
3766 West 11th Avenue
Eugene, Oregon 97402
541-484-9876

Website: <https://roberts1.my-free.website/>

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
Feb 15	NA	X	NA	NA	Category 1

1. The proposed permit is a renewal of an existing Basic Air Contaminant Discharge Permit (ACDP) issued to Roberts and Sons Fine Cabinetry (the facility) located at 3766 West 11th Avenue in Eugene, Oregon. The facility's initial permit (existing permit) was issued on August 24, 2012. An addendum was issued on May 14, 2018, correcting the expiration date for the existing permit to August 24, 2022.
2. The permittee operates a cabinet and similar product manufacturing facility. The facility uses approximately 20 gallons per month of VOC- and HAP-containing coatings per month. The facility currently uses one (1) paint booth with filters for the surface coating operation. Exhaust from sawing and sanding wood is ducted to a Murphy Rogers baghouse for control of particulate matter emissions.
3. This facility qualifies for a Basic ACDP because the expected usage of VOC- and HAP-containing coating materials used in the surface coating operation is greater than 250 gallons per year, but less than 250 gallons per month.
4. The source is located in an attainment area for PM_{2.5}, SO₂, N₂O, VOC (ozone), and Lead (Pb), and in the Eugene Springfield Air Quality Maintenance Area for PM₁₀ and CO.
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. 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.

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