Department of Environmental Quality
Air Quality Division

OREGON TITLE V OPERATING PERMIT APPLICATION REVIEW REPORT

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PSEL CRED	SOURCE TEST	CMS	AMB MON	COMPL SCHED	SPEC COND	REPORT A	REPORT S	REPORT M	EXCESS R	EXCESS N	NSPS	NSR	PSD	NESHAP	SIZE TV	SIZE SM	SIZE A2	PUBL NOTC
						X	X			X				X	X			X

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INTRODUCTION

1. This is a renewal of existing Title V permit 03-2778. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

2. There were not any off-permit changes, 502(b)(10) changes, administrative amendments, and minor modifications which occurred during the last permit renewal.

3. Condition-by condition changes between previous permit 03-2778 and this renewal permit 03-2778:

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
	13	Deletion of permit condition	Short term plant site emissions no longer applicable
13	14	Changed "annual" to specifically, 12-month rolling basis; changed 1 tons/year PM and PM_{10} PSEL to zero tons/year	Change in regulation language; updated PSELs based either on De minimis level
14		Addition of permit condition for the due date for compliance with NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
15		Addition of permit condition for the work practice standard for closed molding operations	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
16		Addition of permit condition for the HAP emission limits for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
17		Addition of permit condition for the determination of organic HAP emission factors for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
18		Addition of permit condition for the organic HAP standards for all resins or gel coats for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
19		Addition of permit condition for the determination of the organic HAP emissions limit for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
20		Addition of permit condition for the calculation of the actual weighted average organic HAP emissions factor for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
21		Addition of permit condition equation for the actual weighted average organic HAP emissions factor for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
22		Addition of permit condition related to operation and resin type for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
23		Addition of permit condition for organic HAP emission limits without add-on controls for the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
24-25		Addition of permit condition for demonstrating initial compliance with the NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
27		Addition of permit condition pertaining to purposeful rendering of inaccurate monitoring devices or methods	Addition of general permit condition in the regulations
28		Addition of permit condition pertaining to use of methods to determine actual emission must also be used for compliance determination	Addition of general permit condition in the regulations
29	17	Updated language regarding annual emissions	Updated regulation language
30		Changed “annual” to specifically, 12-month rolling basis	Updated regulation language
31		Addition of permit condition for source testing requirements	Addition of general permit condition in the regulations
34		Additions of permit condition for monitoring requirements for closed molding operations	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
35		Addition of permit condition for data collection and monitoring related to NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
36		Addition of permit condition for data collection and monitoring related to NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
37		Addition of permit condition for data collection and monitoring related to NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
39		Addition of permit condition pertaining to permittee's effort to maintain 100% of all required records	Addition of general permit condition in the regulations
43		Addition of permit condition for recordkeeping requirements related to NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
44		Addition of permit condition regarding excess emissions	Addition of general permit condition in the regulations
45		Addition of permit condition for permit deviation reporting	Addition of general permit condition in the regulations
46		Addition of permit condition for responsible official certification	Addition of general permit condition in the regulations
47	26	Moved report due date condition to report guidelines and added semiannual compliance certification sub-condition	Streamlining of the permit condition; addition of general permit condition in the regulations
49	27	Addition of PM and PM_{10} to condition, updated annual language to 12-month rolling and changed annual VOC reporting to monthly	Updated regulation language
50		Addition of permit condition for semiannual compliance report related to NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW
51		Addition of permit condition for initial resin and gelcoat compliance related to NESHAP MACT standard	Stationary source is now subject to NESHAP standard 40 CFR 63 Subpart WWWW

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
G4		Addition of permit condition pertaining to masking emissions	Addition of general permit condition in the regulations
N/A	Attachment 1	Removal of cross-referenced regulation numbers	The revised regulation numbers have been in effect since the previous permit

FACILITY DESCRIPTION

4. Miles Fiberglass & Plastics Inc. operates a facility which produces fiber reinforced plastic parts, located in Portland, Oregon. This facility manufactures various finished fiberglass reinforced products. The resins used contain monomers (usually styrene) that chemically link to become polymers when a chemical initiator is added. This causes the liquid resin to become solid. However, during application of the resin, some of the monomer evaporates out of the resin before it can be linked, resulting in emissions of VOCs.

   This facility uses four general processes to form resins into parts. Gelcoat Resin Application uses a spray gun to apply the colored finish coat to the molds before the fiber reinforcement is added. The gelcoat is a special resin used to form what will be the finish of the part. In some cases, a vapor suppressant may be added to the gelcoat to reduce styrene emissions. The Mechanical (Spray) Resin Application (SRA) process uses a spray gun or other device to apply resin to parts. This process generally accounts for most of the resin use. Like the gelcoat resin, in some situations a vapor suppressant may be used to reduce styrene emissions. The styrene emissions may also be reduced by the use of special mechanical applicators like "flowcoaters" that do not atomize the resin during application and by the use special application techniques ("controlled spraying"), like those described by the Composite Fabricator Association (CFA). In Manual Resin Application (MRA), the resin is applied directly to the fiber reinforcement either before or after it is applied to the part. This results in less emissions than the Mechanical Resin Application process. The emissions from both MRA and SRA can be further reduced by the use of vacuum bagging (covered cure). In vacuum bagging, pressure is applied to a resin lay-up by drawing a vacuum under a flexible membrane which covers the laminate, sealing in the styrene emissions during curing. In closed molding, the resin is placed or forced into a closed mold and allowed to cure. Closed or Press molding is the lowest emitting process. Once the resin has cured, the various parts are removed from their molds or forms and trimmed, repaired, assembled and prepared for shipping. The facility was built in 1977.

5. Air contaminant processes at the facility may include the following:

   5.a. Controlled spraying

   Controlled spraying is a method to increase spray material transfer efficiency and reduce styrene emissions for atomized spray application. Wet surface area is a major factor that affects the styrene emission rate. Atomized spray application contributes to increased surface area in two ways. First a relatively greater amount of atomization is caused by the higher gun tip pressure, because the smaller atomized aerosol particles have a greater relative wet surface area in the spray gun fan pattern. Second, overspray (spray material that travels off-mold) increases the wet surface area. The purpose of controlled spraying is to minimize the wet surface area by reducing the amount of atomization and overspray.
   A controlled spraying program consists of the following three elements, which function synergistically to increase gun transfer efficiency and decrease styrene emissions:

Spray Gun Pressure Calibration - provides a procedure to determine the minimum gun tip pressure for any combination of spray equipment, materials, or conditions.
Operator Training - optimizes the operator spraying technique to maximize transfer efficiency and minimize styrene emissions. An operator training program outlines methods for spray gun handling and application techniques focused on reducing overspray and therefore increasing transfer efficiency and decreasing styrene emissions.
Overspray Containment Flanges - reduces overspray through the installation of mold perimeter flanges that limit "off-mold spray" from the edge of the mold. These flanges can be built into the mold, or consist of removable masking around the perimeter of the mold.

Controlled spraying can be introduced in all cases where atomized spray application is currently used. In order to qualify as controlled spraying, all three of the above elements must be in place and documented, as outlined in the "CFA Controlled Spraying Handbook."

5.b. Covered-cure –

Covered-cure refers to an impervious film or barrier that is applied to the wet surface of the mold just after the application of the resin. This barrier may be applied immediately after the roll-out phase, or just after the application phase without any subsequent roll-out. Once in place, this barrier is assumed to 100% effective at preventing the evaporation and emission of styrene (or other HAP) vapor from the uncured composite laminate. Presumably, the barrier film has no effect whatsoever upon the emissions that occur during the application phase. The covered-cure technique includes vacuum-bagging and press- molding.

5.c. Roll-out –

Roll-out refers to a manual operation that uses squeegees, special roller tools, or stiff brushes to spread out the resin applied to the glass reinforcement, smooth down the tangled mass of glass fibers, and remove the air bubbles trapped in the wet glass fibers.

5.d. Filament application –

In the filament winding process, the resin is applied to a continuous strand of glass roving, which is a rope-like bundle made from fine glass filaments. This glass roving is passed through a dip tank that contains liquid resin. The resin in the dip tank wets the glass, and then the wet roving is tightly wound around a rotating mold, called a mandrel. Filament winding is normally used to make cylindrical fiberglass reinforced plastic parts, such as storage tanks, reaction vessels, duct work, process stacks, and piping.

5.e. Gelcoat spray application –

Gelcoat spray application uses a mechanical fluid delivery system to apply gelcoat to the open mold surface. Typically, a pressurized spray gun is used to coat the mold with a fine mist of catalyzed gelcoat aerosol droplets. Note that gelcoat must be applied with atomized spray equipment, and cannot be applied using non-atomized equipment.

5.f. Manual application –

Manual application refers to the hand application of resin using a "bucket and tool," and is generally regarded as the simplest fiberglass lamination process. Dry glass fiber reinforcement, in the form of chopped strand mat, woven roving, or cloth fabrics, is first cut and then fitted into or onto the open mold surface. A small precise quantity of catalyst is added to cups or small buckets full of resin, and the catalyzed resin is then quickly poured onto the dry glass reinforcement.

5.g. Mechanical atomized application –

Mechanical atomized application uses a mechanical fluid delivery system such as a spray gun to apply catalyzed resin to the mold or glass reinforcement or a "chopper gun" to simultaneously apply catalyzed resin and chopped glass fibers to the mold surface. Both of these guns atomize the resin stream, forming a fine mist of resin aerosol droplets.

5.h. Mechanical non-atomized application –

Mechanical non-atomized application employs a mechanical fluid delivery system to apply resin to the glass reinforcement without atomizing the resin fluid stream. Non-atomized application equipment includes flow coaters, flow choppers, and pressure-fed rollers. Flow coater guns and flow chopper guns are not considered to be "spray guns" due to the absence of spray atomization. While mechanical non-atomized application can be used in a wide range of production settings, it may not be suitable for all spray application. For example, flow coaters and flow choppers may not be feasible where the material must be projected over a long distance to reach across a large mold surface or into a "deep-draw" mold geometry. Problems have been reported when flow choppers were used to coat vertical mold surfaces. In the case of pressure-fed rollers, roll stock fiberglass must be used, which can greatly complicate the cutting and positioning of glass reinforcement within a complicated mold geometry. Hence, mechanical non-atomized application is not a universal substitute for all mechanical atomized application (which uses standard spray lay-up or "chopper" guns) due to these technical and economic considerations.

5.i. Vapor-suppressed resin –

A vapor-suppressed resin contains a small amount of a vapor suppressant additive, which is usually a wax or wax-like substance. The vapor suppressant is dissolved or dispersed in the resin, and migrates to the surface forming a waxy layer on the still wet resin. This waxy layer inhibits the evaporation of styrene from the curing laminate surface, and works best when the wet surface is left undisturbed. During the application and roll-out phases, the surface is highly disturbed and fresh resin and styrene is continuously exposed to the air, which reduces the effectiveness of the suppressant. Hence, vapor suppressants do not appear to affect the emission rate during the application phase, only partially affect the emission rate during the roll-out phase (because the wet surface is disturbed by the action of the rollers), and fully affect the emission rate during the curing phase.

The type of vapor suppressant should be carefully matched to each resin system - some suppressants seem to work better for a particular resin type than another. Suppressants are reportedly not as effective when used with filled resin systems. The CFA has developed a test protocol called the "CFA Vapor Suppressant Effectiveness Test Method " to estimate the emission rates that occur during the roll-out and cure phases of the lamination process. This test will be used to verify the effectiveness of each resin/suppressant combination.

Vapor suppressants cannot be used in all applications, due to serious problems with secondary bonding. Secondary bonding refers to the chemical and mechanical bonds that develop between the successive layers of resin and glass that are applied to the mold to build-up the finished laminate. The vapor suppressant film can decrease the adhesion between these successive laminate layers, causing the structural integrity of the laminate to be weakened. In critical applications, such as storage tanks or other load bearing structures, a laminate bond failure can lead to a catastrophic failure of the structure.

Vapor suppressants cannot be used for gel coat application, because nearly all gelcoats require a very strong secondary bond with the subsequent laminate layer.

5.j. Closed molding –

Transfer of resin directly into a closed mold or placed into a press mold, where it is allowed to cure.

5.k. Use of miscellaneous putties, paints, solvents, cleaners and other materials used in the manufacturing processes, and in the construction and maintenance of molds. Most of the miscellaneous emissions are acetone. Other chemicals emitted include small quantities of various VOCs including the HAPs listed below in Toxics Substance Usage section of this report.

5.l. Solvent storage tanks, piping and recycling equipment (emissions are accounted for in the miscellaneous VOC use).

6. The following activities which are present at the facility are insignificant in aggregate:

6.a. Particulate matter emissions from spray application exhaust filter units.
6.b. Various grinding, sanding and woodworking operations.
6.c. Mold preparation and repair activities.
6.d. Storage tanks and piping for resins.

Emission units and SCC Codes

Emission unit	Process Descriptions	Process SCC Code
VOC-A	Gelcoat Resin use	3-08-007-22
	Laminating Resin Use, Manual Application	3-08-007-23
	Laminating Resin Use, Mechanical application	3-08-007-24
	Miscellaneous VOC Use	3-08-007-99
Agg-Insig	Aggregate Insignificant Activities	3-08-007-20

7. The following categorically insignificant activities are present at the facility:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under Divisions 20 through 32 of this chapter, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year
- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Food service activities
- Janitorial activities

- Personal care activities
- Grounds keeping activities including, but not limited to building painting and road and parking lot maintenance
- Maintenance and repair shop
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities
- Warehouse activities
- Temporary construction activities
- Accidental fires
- Air vents from air compressors
- Electrical charging stations
- Fire brigade training
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- Health, safety, and emergency response activities
- Emergency generators and pumps used only during loss of primary equipment or utility service
- Oil/water separators in effluent treatment systems
- Combustion source flame safety purging on startup

APPLICABLE REQUIREMENTS (EMISSIONS LIMITS AND STANDARDS)

8. The following state and federally enforceable rule requirements have been determined to be applicable to this facility:

8.a.	Division 208:	0110;***** establishes a visible emissions limit. 0210; establishes requirements to prevent particulate matter from becoming airborne.
8.b.	Division 226:	0210; establishes particulate concentration emissions limits for fuel burning equipment.
8.c.	Division 228:	0210******; establishes particulate concentration emissions limits for non fuel burning equipment..
8.d.	Division 222:	0020; requires Plant Site Emission Limits.

*****OAR 340-208-0110 is included because it is federally enforceable for all air contaminant sources, and because OAR 340-208-0600 only applies to non-fuel burning equipment and is only enforceable by the State. OAR 340-208-0600 is a county specific rule for non-fuel burning equipment which is more stringent than the general opacity rule (OAR 340-208-0110).

******OAR 340-228-0210 is included because it is federally enforceable and because OAR 340-208-0610 is only enforceable by the State. OAR 340-208-0610 is a county specific rule which is equally as stringent as OAR 340-228-0210 in this case.

9. The following state only enforceable rule requirements have been determined to be applicable to this facility:

9.a.	Division 208:	0600; establishes a visible emissions limit. 0610; establishes a particulate concentration emissions limit. 0670; establishes a particulate emission size limitation. 0660; establishes limits on the emission of odorous matter.

10. Compliance Assurance Monitoring (CAM) applicability.
This facility is not subject to the requirements of 40 CFR Part 64 because the source does not employ any control devices.

CHANGES TO THE PERMIT

11. The permit condition language has been revised in some conditions. This has been done to make the conditions more clear. These changes do not affect applicability or standards.

12. Some general permit conditions were added in this renewal permit to reflect additional regulations that have been adopted since the prior permit. These additions do not affect applicability or standards.

13. The facility is subject to NESHAP MACT standard 40 CFR Part 63 Subpart WWWW because it is a reinforced plastic composites production facility that is located at a major source of HAP emissions. All applicable regulations were included in this renewal permit.

BASELINE EMISSION RATE

14. The Baseline Emission Rate for this source is zero because it was constructed after 1978.

PLANT SITE EMISSION LIMIT

15. The normal operating schedule for the plant is 24 hrs/day x 6 days/wk x 52 wks/yr = 7488 hrs/yr.

16. The normal annual and maximum monthly plant raw material usage is approximately 155,000 lb/year and 16,300 lb/month of gelcoat and 920,000 lbs/year and 98,000 lb/month of laminating resin.

17. The Plant Site Emission Limit for normal operation is shown below.

Source		PM	PM_{10}	SO_2	NO_x	CO	VOC
Hand Lay-up Spray Lay-up Closed Molding Misc. VOC Use	tons/yr	---	---	---	---	---	38
	lbs/month	---	---	---	---	---	8000
Aggregate Insignificant Activities	tons/yr	----	----	---	---	---	1.0
	lbs/month	---	---	---	---	---	---
TOTAL	tons/yr	----	----	---	---	---	39
	lbs/month	---	---	---	---	---	8000

Calculations are included in the Plant Site Emissions Detail Sheets.

CHANGES TO PLANT SITE EMISSION LIMITS (PSELS)

18. The PSELs in this permit renewal are the same as the PSELs in the current permit with the exception of PM and PM_{10}, which were adjusted from 1 ton per year for each to zero tons per year based on OAR 340-222-0020 (3)(a) that PM and PM_{10} will be emitted at less than the de minimis emission level.

SIGNIFICANT EMISSION RATE

19. The Plant Site Emission Limit increase over baseline (0) is less than the Significant Emission Rate (SER) for VOCs as defined in OAR 340-28-110(82), and is shown below. Therefore, under the current OARs, no further air quality analysis is required for the proposed emission rates. The Plant Site Emission Limit for the source is the generic limit of 39 tons per year under OAR 340-222-0040.

New Source Review applicability

Baseline Emissions	Proposed PSEL	Increase above Baseline *	Significant Emissions Rate (SER)
0 tons/year VOC	39 tons/year VOC	39 tons/year VOC	40 tons/year VOC

*Before a source can increase emissions more than the Significant Emissions Rate (SER) above the source's baseline, the permittee must meet the requirements of the Department's New Source Review Program.

HAZARDOUS AIR POLLUTANT EMISSIONS

20. The estimated emissions of Hazardous Air Pollutants for the current normal year, estimated by the source, are as follows;

CAS Number	Pollutant	Potential to Emit (tons/yr)
100-42-5	Styrene	37.3
131-11-3	Dimethyl Phthalate	0.05
108-10-1	Methyl Isobutyl Ketone	0.15
108-88-3	Toluene	0.15
1330-20-7	Xylenes	0.15
TOTAL (TONS PER YEAR)		39

TOXIC SUBSTANCE USAGE

21. The annual usage of Toxic Substances as estimated by the source, for the current normal year is as follows:

CAS Number	Chemical name	Estimated Annual Usage, (ranges, lb/year)				
		Insignificant	1,001-10,000	10,001-20,000	20,001-50,000	>50,000
100-42-5	Styrene					X
131-11-3	Dimethyl Phthalate		X			
108-10-1	Methyl Isobutyl Ketone	X				
108-88-3	Toluene	X				
1330-20-7	Xylenes	X				
80-62-6	Methyl Methacrylate	X				

Facility Wide Compliance Monitoring Requirements

22. A log of complaints will be used to monitor for odor nuisance conditions and the particulate fallout size standard. The permittee shall maintain a log recording all written complaints, or complaints received via telephone or in person by the responsible official or a designated appointee, that specifically refer to a complaint of odor or particulate fallout nuisance conditions caused by this facility. The permittee will also record the permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the nuisance problem, if possible, within two working days of receiving the complaint, but no later than 10 days after receiving the complaint. The log will be submitted to the Department annually, along with the annual report.

Compliance Monitoring for the PSELs

23. The Plant Site Emission Limits regulate VOC emissions from emission unit VOC-A and includes PM and PM_{10} emissions from the aggregate insignificant activities. Compliance will be demonstrated by recordkeeping of the quantities and styrene contents of resins as well as the type of use and any emissions reduction methods employed, and also recordkeeping of Miscellaneous VOC use at the facility.

ADDITIONAL REQUIREMENTS

24. The source is required to submit reports to the Department semi-annually.

25. This source is not subject to federal regulations for New Source Review.

26. This source is not subject to federal regulations for Prevention of Significant Deterioration (PSD).

27. This source is now subject to federal regulations for National Emissions Standards for Hazardous Air Pollutants (NESHAPS) for reinforced plastic composite production facilities, with a Maximum Achievable Control Technology (MACT), 40 CFR PART 63 SUBPART WWWW, which was promulgated in 2003. The NESHAP applies to each new or existing affected source at reinforced plastic composites production facilities. [40 CFR 63.5790(a)]

    27.a. The facility is located at a major source of HAP emissions. Reinforced plastic composites production is limited to operations in which reinforced and/or non-reinforced plastic composites or plastic molding compounds are manufactured using thermoset resins and/or gel coats that contain styrene to produce plastic composites. The resins and gel coats may also contain materials designed to enhance the chemical, physical, and/or thermal properties of the product. Reinforced plastic composites production also includes cleaning, mixing, HAP-containing materials storage, and repair operations associated with the production of plastic composites. [40 CFR 63.5785(a)]

    27.b. The permittee's operation types are open and closed molding operations which emit below less than the 100 tpy HAP emissions threshold.

    27.c. The affected source consists of all parts of the affected facility engaged in the following operations: open molding, closed molding, centrifugal casting, continuous lamination, continuous casting, polymer casting, pultrusion, sheet molding compound (SMC) manufacturing, bulk molding compound (BMC) manufacturing, mixing, cleaning of equipment used in reinforced plastic composites manufacture, HAP-containing materials storage, and repair operations on parts manufactured at the affected facility. [40 CFR 63.5790(b)]

    27.d. For the purposes of the NESHAP, an existing affected source is any affected source that is not a new affected source. [40 CFR 63.5795(b)]

GENERAL BACKGROUND INFORMATION

28. This source is located in a maintenance area for ozone, and is a significant source of VOCs and an insignificant source of NOx, which are both precursors of ozone. The source is also located in a maintenance area for carbon monoxide, but is an insignificant source of that pollutant. This source is located in a maintenance area for ozone, and is a significant source of VOCs and an insignificant source of NOx, which are both precursors of ozone. The source is also located in a maintenance area for carbon monoxide, but is an insignificant source of that pollutant.

29. A Land Use Compatibility Statement was signed by the Clackamas County on November 15, 1994.

30. This source has also been issued a storm water discharge permit.

31. The permittee was last inspected on 04/05/05, and was found to be in compliance with all permit conditions. The permittee was also inspected on 08/25/99, 08/03/98, and 06/17/97, and was found to be in compliance with all permit conditions on all occasions. There is one odor complaint on record for the facility.

32. The permit is a renewal Oregon Title V Operating Permit.

PUBLIC NOTICE

This permit will be made available for public notice from
February 20, 2007 until March 28, 2007, 5pm. Comments may be submitted until 5 pm on March 28, 2007-.

PH:
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November 3, 2006