

SIMPLE
AIR CONTAMINANT DISCHARGE PERMIT

Department of Environmental Quality
Western Region
750 Front Street NE, Suite 120
Salem, Oregon 97301-1039
(503) 378-8240

This permit is being issued in accordance with the provisions of ORS 468A.040 based on the land use compatibility findings included in the permit record.

ISSUED TO:

Specialty Polymers, Inc.
PO Box 646
Woodburn, Oregon 97071

INFORMATION RELIED UPON:

Application No.: 021854
Date Received: 06/23/2006
Additional Information Received: 8/20/06,
9/12/06, 12/7/06, 1/28/07, 2/8/07, 2/27/07

PLANT SITE LOCATION:

2475 Progress Way
Woodburn, Oregon 97071

LAND USE COMPATIBILITY FINDING:

Approving Authority: City of Woodburn
Approval Date: 6/13/06

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Cheryll Hutchens, Western Region-Salem Air Quality Manager Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-0020):

Table 1 Code	Source Description	SIC
Part B, 70	Synthetic Resin Manufacturing	2821

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1.0 GENERAL EMISSION STANDARDS AND LIMITS

- 1.1. Visible Emissions** Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one year.
- 1.2. Particulate Matter Emissions** The permittee must comply with the following particulate matter emission limits, as applicable:
- Particulate matter emissions from any burning equipment must not exceed 0.1 grains per standard cubic foot, corrected to 12% CO₂ or 50% excess.
 - Particulate matter emissions from any air contaminant source other than fuel burning equipment and fugitive emission sources must not exceed 0.1 grains per standard cubic foot.
- 1.3. Fugitive Emissions** The permittee must take reasonable precautions to prevent fugitive dust emissions by:
- Treating vehicular traffic areas of the plant site under the control of the permittee.
 - Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times.
 - Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer.
- 1.4. 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. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled.
- 1.5. Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by Department personnel.

2.0 PLANT SITE EMISSION LIMITS

2.1. Plant Site Emission Limits (PSEL)

Plant site emissions must not exceed the following:

Pollutant	Limit	Units
NO _x	39	tons per year
CO	99	tons per year
VOC	39	tons per year
Single HAP	9	tons per year
Combined HAPs	24	tons per year

2.2. Annual Period

The annual plant site emissions limits apply to any 12-consecutive calendar month period.

3.0 COMPLIANCE DEMONSTRATION

3.1. PSEL Compliance Monitoring

Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:

$$E = [\Sigma(EF \times P)/2000 \text{ lbs}] + E_{\text{VOC}} + E_{\text{HAPs}}$$

where,

E = pollutant emissions (tons/year);

EF = pollutant emission factor (see Condition 9.0);

P = process production (Condition 10.0)

$E_{\text{VOC/HAP}}$ = VOC/HAPs emissions determined in accordance with Condition 3.3 (tons/year).

3.2. Emission Factors

The permittee must use the default emission factors provided in Condition for calculating pollutant emissions, unless alternative emission factors are approved by the Department. The permittee may request or the Department 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 the Department.

- 3.3. Process VOC/HAPs Emission Determination** The permittee will use the approved emission calculations as provided in the permit application or other Department approved software program(s) to determine the amount VOC/HAP emissions generated from the manufacturing production processes at this facility for each 12 consecutive month period.

4.0 RECORDKEEPING REQUIREMENTS

- 4.1. Operation and Maintenance** The permittee must maintain records of the PSEL calculations required in Condition 3.0, the pollutant emissions and operational data that are to be reported in Condition 5.2, and the Production/Operation records required by Condition 10.0.
- 4.2. Excess Emissions** The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by the Department in accordance with OAR 340-214-0330(4).
- 4.3. Complaint Log** The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated with 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.
- 4.4. Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to the Department upon request.

5.0 REPORTING REQUIREMENTS

- 5.1. Excess Emissions** The permittee must notify the Department of excess emissions events if the excess emission is of a nature that could endanger public health.
- 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 regional office identified in Condition 6.4 by e-mail, telephone, facsimile, or in person.
 - b. If the excess emissions occur during non-business hours, the permittee must notify the Department 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 the Department.
- 5.2. Annual Report** For each year this permit is in effect, the permittee must submit to the Department by **February 15** two (2) copies of the following information for the previous calendar year:
- a. A summary of annual pollutant emissions determined each month in accordance with Condition 3.0 and comparison to the PSEL.
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by permittee during the year.
 - d. List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions.
 - e. List major maintenance performed on pollution control equipment.
- 5.3. Notice of Change of Ownership or Company Name** The permittee must notify the Department in writing using a Departmental "Permit Application Form" within 60 days after the following:
- a. Legal change of the name of the company as registered with the Corporations 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 the Department in writing using a Departmental “Notice of Construction Form,” or “Permit Application Form,” and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before:
- a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;
 - b. Making any physical change or change in 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 air pollution control equipment.
- 5.5. Where to Send Reports and Notices** The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in Condition 6.3.

6.0 ADMINISTRATIVE REQUIREMENTS

- 6.1. Permit Renewal Application** The completed application package for renewal of this permit is due on **December 1, 2011**. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in Condition 6.3.
- 6.2. Permit Modifications** Application for a modification of this permit must be submitted not less than **60** days prior to the source modification. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the Business Office of the Department.
- 6.3. Permit Coordinator Address** All reports, notices, and applications should be directed to the Permit Coordinator as follows:
Department of Environmental Quality
Western Region
750 Front Street NE, Suite 120
Salem, OR 97301-1039
Telephone: (503) 378-5305

- 6.4. Department Contacts** Information about air quality permits and the Department's regulations may be obtained from the DEQ web page at www.deq.state.or.us. All inquiries about this permit should be directed to the Salem regional office as follows:
Department of Environmental Quality
Salem Office
750 Front Street NE, Suite 120
Salem, OR 97301-1039
Telephone: (503) 378-8240

7.0 FEES

- 7.1. Annual Compliance Fee** The Annual Fee specified in OAR 340-216-0020, Table 2, Part 2 for a Simple ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by Department regulations, will be mailed prior to the above date.
- 7.2. Change of Ownership or Company Name Fee** The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company.
- 7.3. Special Activity Fees** The special activity fees specified in OAR 340-216-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit.
- 7.4. Where to Submit Fees** Fees must be submitted to:
Department of Environmental Quality
Business Office
811 SW Sixth Avenue
Portland, Oregon 97204-1390

8.0 GENERAL CONDITIONS AND DISCLAIMERS

- 8.1. Permitted Activities** This permit allows the permittee 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, or is revoked.
- 8.2. Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by the Department.

- 8.3. Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 8.4. 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.
- 8.5. Department Access** The permittee must allow the Department'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.
- 8.6. Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 8.7. Open Burning** The permittee may not conduct any open burning except as allowed by OAR 340 Division 264.
- 8.8. Asbestos** The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 8.9. 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.
- 8.10. Termination, Revocation, or Modification** The Department may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084.

9.0 EMISSION FACTORS

Emissions device or activity	Pollutant	Emission Factor (EF)	EF units	EF Reference
Natural Gas Fired Equipment	NO _x	100	lb/MMcf	DEQ
	CO	84	lb/MMcf	DEQ
	VOC	5.5	lb/MMcf	DEQ

10.0 PROCESS/PRODUCTION RECORDS

Emissions device or activity	Process or production parameter	Frequency
Boilers	natural gas combustion (ft ³)	monthly, annually
Monomer Feed Tanks/Reactors	vapor released (lbs)	monthly, annually
Storage Tanks	evaporative losses(lbs)	monthly, annually
Railcar Product Delivery	evaporative losses (lbs)	monthly, annually

11.0 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 1 st and ending December 31 st	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	PACT	Powder Activated Carbon Treatment
dscf	dry standard cubic foot	PCD	pollution control device
EPA	US Environmental Protection Agency	PM	particulate matter
FCAA	Federal Clean Air Act	PM ₁₀	particulate matter less than 10 microns in size
gal	gallon(s)	ppm	part per million
gr/dscf	grains per dry standard cubic foot	PSD	Prevention of Significant Deterioration
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	PSEL	Plant Site Emission Limit
I&M	inspection and maintenance	PTE	Potential to Emit
lb	pound(s)	RACT	Reasonably Available Control Technology
MMBtu	million British thermal units	scf	standard cubic foot
MMft ³	million cubic feet	SER	Significant Emission Rate
NA	not applicable	SIC	Standard Industrial Code
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SIP	State Implementation Plan
NO _x	nitrogen oxides	SO ₂	sulfur dioxide
NSPS	New Source Performance Standard	Special Control Area	as defined in OAR 340-204-0070
		VE	visible emissions
		VOC	volatile organic compound
		year	A period consisting of any 12-consecutive calendar months

