



Oregon

Kate Brown, Governor

Department of Environmental Quality
Northwest Region Portland Office
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May 17, 2021

Frederick Albios
Daimler Truck NA
6936 N Fathom Street
Portland OR 97217

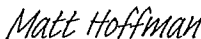
Re: Issuance of Oregon Title V Operating Permit Renewal
Permit No.: 26-2197-TV-01
Application No.: 29136
Multnomah County

The Department of Environmental Quality has completed processing your Oregon Title V Operating Permit renewal application and has issued the enclosed permit. Based upon the material contained in your application and the comments received in response to the public notice, DEQ has issued the enclosed Oregon Title V Operating Permit renewal. To the extent that any permit conditions are different than those contained in the proposed permit, the reasons are explained in the attached Review Report.

The permit became effective the date it was signed unless a hearing is requested. If you wish to appeal any of the conditions or limitations contained in the attached permit, you have a right to request a hearing on this permit within 20 calendar days from the date of this letter. The hearing must be requested, and will be conducted, in accordance with ORS Chapter 183, OAR Chapter 137, division 003 and OAR Chapter 340, division 011. You must send your written request to: Office of Director, DEQ, 700 NE Multnomah Street, Suite 600, Portland, Oregon 97232. If you fail to file a timely request for hearing, your right to a hearing will be considered waived and this permit will become a final order by default without further action by DEQ, as per OAR 340-011-0535(1).

You are urged to carefully read the permit and take all possible steps to ensure compliance with the conditions established.

Sincerely,


Matt Hoffman (May 17, 2021 14:40 PDT)

Matt Hoffman
DEQ Northwest Region AQ Manager

Enclosure

cc: EPA Region 10 via email
DEQ HQ Air Quality and DEQ NWR Air Quality



OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY OREGON TITLE V OPERATING PERMIT

Northwest Region
700 NE Multnomah St., Suite 600
Portland, OR 97232

Issued in accordance with provisions of ORS 468A.040
and based on land use compatibility findings included in the permit record.

ISSUED TO:

Daimler Trucks North America LLC
6936 Fathom Street
Portland, OR 97217

INFORMATION RELIED UPON:

Application Number: 029136
Received: 07/03/2017

PLANT SITE LOCATION:

Western Star Truck Plant Portland
Truck Manufacturing Plant (TMP)
6936 N. Fathom St, Portland, OR

LAND USE COMPATIBILITY STATEMENT:

Issued by: The City of Portland
Dated: 07/22/1993

Parts Manufacturing Plant (PMP)
5400 N. Basin Ave, Portland, OR 97217

ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY

Matt Hoffman

Matt Hoffman (May 17, 2021 15:41 PDT)

05/17/2021

Matt Hoffman, Northwest Region Air Quality Manager

Date

Nature of Business

Manufacturing of Heavy Trucks and Parts

Primary

SIC

3711, 3714

NAICS

336120

RESPONSIBLE OFFICIAL:

Title: Plant Manager

FACILITY CONTACT PERSON

Name: Traci Parker
Title: Senior Environmental Engineer
Phone: (503) 745-7602

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit	OSHA	Occupational Safety and Health Administration
ASTM	American Society for Testing and Materials	Pb	lead
BWPA	Best Work Practices Agreement	PCD	pollution control device
AQMA	Air Quality Maintenance Area	PM	particulate matter
calendar year	The 12-month period beginning January 1st and ending December 31 st	PM ₁₀	particulate matter less than 10 microns in size
CAO	Cleaner Air Oregon	PM _{2.5}	particulate matter less than 2.5 microns in size
CFR	Code of Federal Regulations	ppm	part per million
CO	carbon monoxide	PSD	Prevention of Significant Deterioration
CO ₂ e	carbon dioxide equivalent	PSEL	Plant Site Emission Limit
CPMS	continuous parameter monitoring system	PTE	Potential to Emit
DEQ	Oregon Department of Environmental Quality	RACT	Reasonably Available Control Technology
dscf	dry standard cubic foot	scf	standard cubic foot
EF	emission factor	SER	Significant Emission Rate
EPA	US Environmental Protection Agency	SERP	source emission reduction plan
FCAA	Federal Clean Air Act	SIC	Standard Industrial Code
Gal	gallon(s)	SIP	State Implementation Plan
GDF	gasoline dispensing facility	SO ₂	sulfur dioxide
GHG	greenhouse gas	Special Control Area	as defined in OAR 340-204-0070
gr/dscf	grains per dry standard cubic foot	ST	Source test
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	TACT	Typically Achievable Control Technology
HCFC	halogenated chloro-fluoro-carbon	VE	visible emissions
ID	identification number	VOC	volatile organic compound
IEU	insignificant emission unit	year	A period consisting of any 12-consecutive calendar months
I&M	inspection and maintenance		
lb	pound(s)		
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		

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010, and 340-218-0120 (2)]
2. All conditions in this permit are federally enforceable except as Conditions 5, 6, 26, 27, 28 64, 65 and G5, which are only enforceable by the state. [OAR 340-218-0060]

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE IDENTIFICATION

3. Emissions units regulated by this permit are the following: [OAR 340-218-0040 (3)]

Emissions Unit	EU ID	Pollution Control Device
All Coating Application at TMP (Truck Manufacturing Plant)	1-AC	Spray Booth Filters
All Coating Application at PMP (Parts Manufacturing Plant)	2-AC	Spray Booth Filters
Natural Gas Combustion Devices	5-BO	None
Non-Combustion VOCs	7-VOC	None
Aggregate Insignificant Activities	8-AGG	None
Emergency Generator	9-Egen	None

EMISSION LIMITS AND STANDARDS

4. The following tables contain summaries of applicable requirements, other than the Plant Site Emission Limit (PSEL), along with the monitoring methods for the emissions units to which those requirements apply.

FACILITY WIDE EMISSION LIMITS AND STANDARDS

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Monitoring Method	Condition Number
Particulate Size Standard OAR 340-208-0450	5	PM >250 microns	N/A	Periodic monitoring	63
Fugitive Odor Nuisance Condition OAR 340-208-0300	6	Fugitive Odor	No Nuisance	Periodic monitoring	0
Fugitive Particulate Condition [OAR 340-208-0210]	7	Fugitive Particulate	Reasonable Precaution	Periodic monitoring	63
Stratospheric Ozone and Climate Protection [40 CFR part 82]	8, 9	Class I and Class II substances	Labeling Requirements	Recordkeeping	66
Risk Management Plan [40 CFR part 68]	10	Risk Management	Risk Management Plan	NA	10

5. The permittee must not cause or permit the emission of any particulate matter, which is larger than 250 microns in size provided such particulate matter does or will deposit on the real property of another person. Monitor per Condition 63. This condition is only enforceable by the State. [OAR 340-208-0450].
6. The permittee must not allow the emission of odorous matter in such a manner as to cause a public nuisance in accordance with OAR 340-208-0300. This condition is only enforceable by the State.
7. The permittee must not cause, suffer, allow, or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but not be limited to the following: [OAR 340-208-0210]
 - 7.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - 7.b. Application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
 - 7.c. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - 7.d. Adequate containment during sandblasting or other similar operations;
 - 7.e. The prompt removal from paved streets of earth or other material which does or may become airborne.
8. The permittee is subject to all of the applicable requirements as specified in 40 CFR Part 82, Subpart E; The Labeling of Products Using Ozone-depleting Products. Monitor per Condition 66. [40 CFR Part 82 and OAR 340-260-0040]
9. The permittee is allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to section 612 of the Act without requiring a permit revision. Monitor per Condition 66. [40 CFR Part 82 and OAR 340-260-0040]
10. Should this facility become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

EMISSIONS UNIT SPECIFIC CONDITIONS

Applicable Requirement: Surface Coating VOC limitations, Visible Emissions, and Particulate limits for EU IDs 1-AC (TMP) and 2-AC (PMP)

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Monitoring Method	Condition Number
Opacity Rule [OAR 340-208-0110(2)(b)]	11	Opacity	20 %	Periodic Monitoring	67
Particulate Emissions Rule - Non-Fuel Burning Equipment [OAR 340-226-0210(2)(b)]	12	PM/PM ₁₀	0.14 gr/dscf	Periodic Monitoring	67
NEW Particulate Emissions Rule - Non-Fuel Burning Equipment [OAR 340-226-0210(2)(c)]	13	PM/PM ₁₀	0.10 gr/dscf	Periodic Monitoring	67
RACT VOC Limit [OAR 340-232-0160(5)(j)]	14	lb-VOC/gal Daily Average	See Condition 14	Recordkeeping of daily usage or list of coatings	68
NESHAP Subpart MMMM Limits [40 CFR Part 63.3880-4080]	30	kg organic HAP/liter coating solids 12-month rolling basis	0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids	Recordkeeping and Calculations	71 through 75
NESHAP Subpart PPPP Limits [40 CFR Part 63.4480-4581]	45	kg organic HAP emitted /kg coating solids 12-month rolling basis	0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids	Recordkeeping and Calculations	76 through 80

11. The permittee must not cause or allow the emissions from any individual source included in EU IDs 1-AC and 2-AC to equal or exceed 20% opacity. Opacity must be measured as a six-minute block average using a continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60, or an alternative monitoring method approved by DEQ that is equivalent to EPA Method 9 Monitor per Condition 67. [OAR 340-208-0110(2)(b)]
12. The permittee must not cause or allow the emission of particulate matter from any individual source included in EU IDs 1-AC and 2-AC in excess of 0.14 grains per dry standard cubic foot. Monitor per Condition 67. [OAR 340-226-0210(2)(b)]
13. The permittee must not cause or allow the emission of particulate matter from any individual source installed or modified on or after April 16, 2015 in excess of 0.10 grains per dry standard cubic foot. Monitor per Condition 67. [OAR 340-226-0210(2)(c)]

14. The permittee must not allow emissions of Volatile Organic Compounds from EU ID 1-AC (TMP) or EU ID 2-AC (PMP) to exceed the following limits or the RACT allowable VOC emissions as calculated in Condition 68.c.1 on a daily average basis, as measured in accordance with Condition 68: [OAR 340-232-0160(5)(j)]

- A. Clear Coatings 4.3 lb/gal.
- B. Forced Air Dried or Air Dried 3.5 lb/gal.
- C. Extreme Performance Coatings 3.5 lb/gal.
- D. Other Coatings (i.e. Powder, oven dried) 3.0 lb/gal.

Applicable Requirements; Visible Emissions and Particulate limits for EU ID 5-BO

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Monitoring Method	Condition Number
Opacity Rules [OAR 340-208-0110(4)]	15	Opacity	20 %	Recordkeeping	69
Particulate Emissions Rule - Fuel Burning Equipment [OAR 340-228-0210(1)(b)]	16	PM/PM ₁₀	0.14 gr/dscf	Recordkeeping	69
Particulate Emissions Rule - New Fuel Burning Equipment [OAR 340-228-0210(1)(c)]	17	PM/PM ₁₀	0.10 gr/dscf	Recordkeeping	69

15. The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from any individual source included in EU ID 5-BO which is equal to or greater than 20% opacity, excluding uncombined water. Monitor per Condition 69. [OAR 340-208-0110(4)]
16. The permittee must not cause or allow the emission of particulate matter from any individual source included in EU ID 5-BO, in excess of 0.14 grains per dry standard cubic foot, corrected to 50% excess air. Monitor per Condition 69. [OAR 340-228-0210(2)(b)]
17. The permittee must not cause or allow the emission of particulate matter from any individual fuel burning source installed or modified on or after April 16, 2015, in excess of 0.10 grains per dry standard cubic foot, corrected to 50% excess air. Monitor per Condition 69. [OAR 340-228-0210(2)(c)]

INSIGNIFICANT ACTIVITIES

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit\Standard	Monitoring Requirements	
				Monitoring Method	Condition Number
Opacity Rule [OAR 340-208-0110(4)]	18	Visible Emissions	20 % Opacity	N/A	N/A
Particulate (gr. load) Rules, Fuel Burning Equipment [340-228-0210(2)(b)]	19	PM/PM ₁₀	0.14 gr/dscf	N/A	N/A
Particulate (gr. load) Rules, Fuel Burning Equipment [340-228-0210(2)(c)]	20	PM/PM ₁₀	0.10 gr/dscf	N/A	N/A
Particulate (gr. load) Rules, Non-Fuel Burning Equipment [OAR 340-226-0210(2)(b)]	21	PM/PM ₁₀	0.14 gr/dscf	N/A	N/A
Particulate (gr. load) Rules, Non-Fuel Burning Equipment [OAR 340-226-0210(2)(c)]	22	PM/PM ₁₀	0.10 gr/dscf	N/A	N/A
NSPS 40 CFR 60.4230 thru 60.4248	23	Manufacturer certification	See NSPS subpart JJJJ	Maintain records of certification and maintenance	

18. The permittee must not cause or allow the emissions of any air contaminant into the atmosphere which is equal to or greater than 20% opacity, excluding uncombined water, from any source. [OAR 340-208-0110(4)]
19. The permittee must not cause or allow the emission of particulate matter in excess of 0.14 grains per dry standard cubic foot, corrected to 50% excess air, from any fuel burning equipment installed, constructed or modified after June 1, 1970 but before April 16, 2015. [OAR 340-228-0210(2)(b)]
20. The permittee must not cause or allow the emission of particulate matter in excess of 0.10 grains per dry standard cubic foot, corrected to 50% excess air, from any fuel burning equipment installed, constructed or modified on or after April 16, 2015. [OAR 340-228-0210(2)(c)]
21. The permittee must not cause or allow the emission of particulate matter in excess of 0.14 grains per dry standard cubic foot, from any non-fugitive air contaminant source other than fuel burning equipment installed, constructed after June 1, 1970 but before April 16, 2015. [OAR 340-226-0210(2)(b)]
22. The permittee must not cause or allow the emission of particulate matter in excess of 0.10 grains per dry standard cubic foot, from any non-fugitive air contaminant source other than fuel burning equipment installed, constructed or modified on or after April 16, 2015. [OAR 340-226-0210(2)(c)]

23. The permittee must comply with the applicable requirements of 40 CFR 60 Subpart JJJJ for Spark Ignition Reciprocating Internal Combustion Engines, including but not limited to proof or manufacturer certification and compliance with manufacturer operation and maintenance specifications. Compliance with NESHAP subpart ZZZZ is met by complying with the NSPS subpart JJJJ. Monitoring per Condition 85.r [40 CFR 60 subpart JJJJ].

PLANT SITE EMISSION LIMITS

24. Prior to January 1, 2023, the permittee must not allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0040 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)	Emission Reduction Credit (tons/yr)
PM	24	5	0
PM ₁₀	24	5	0
PM _{2.5}	24	5	0
SO ₂	39	0	0
NO _x	39	0	0
CO	99	0	0
VOC	470	0	0
GHG CO _{2e}	74,000	0	0

Note: All PM is assumed to be PM_{2.5}.

BEST WORK PRACTICES AGREEMENT

25. On and after January 1, 2023, the permittee must not allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0040 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)	Emission Reduction Credit (tons/yr)
PM	24	5	0
PM ₁₀	24	5	0
PM _{2.5}	24	5	0
SO ₂	39	0	0
NO _x	39	0	0
CO	99	0	0
VOC	86	0	0
GHG CO _{2e}	74,000	0	0

Note: All PM is assumed to be PM_{2.5}. For VOCs, the rolling 12 consecutive month period for demonstrating compliance with the 86 tons/yr PSEL begins on January 1, 2023.

26. On and after January 1, 2023 the permittee must not allow VOC emissions from surface coating operations to exceed 39 tons in any rolling 12 consecutive month period. Monitoring per Condition 70.
- 26.a. VOCs attributable to touch-up of previously coated components, adhesive usage, cleaning solvent usage and from paint application to miscellaneous parts will not be counted against the 39 tons per year limit (paint application to miscellaneous parts does not include chassis or cab painting).
- 26.b. The permittee may temporarily increase VOC emissions from painting operations in the event of unforeseen supply issues, provided that, prior to allowing surface-coating VOC emissions to exceed 39 tons per rolling 12 month period, Daimler must provide to DEQ written notice of the cause of the increase, the anticipated duration and the odor mitigation measures that Daimler will employ during that time period. This condition is only enforceable by the State. [BWPA and OAR 340-208-0320 & OAR 340-208-0550] *Note:* For VOCs, the rolling 12 consecutive month period for demonstrating compliance with the 39 tons/yr surface coating limit begins on January 1, 2023. *This condition is only enforceable by the State. [BWPA No. AQ/V-NWR-2019-109 & OAR 340-208-0320 & OAR 340-208-0550]*
27. Until such time as the permittee is below 39 tpy of VOC from all surface-coating operations on a rolling 12 month basis, the permittee must implement the following best work practice measures for all surface coating operations at the Facility: *This condition is only enforceable by the State. [BWPA No. AQ/V-NWR-2019-109 & OAR 340-208-0320 & OAR 340-208-0550]*
- 27.a. By no later than February 20, 2021, develop and implement a standard practice for use in determining the feasibility of using factory premix paint from an offsite supplier. Submit standard practice procedure to DEQ for review and an opportunity to provide comments to the permittee regarding such procedure;
- 27.b. Continue to use only high-solids pre-mixed coatings where the permittee has already initiated use;
- 27.c. By no later than November 22, 2020, submit to DEQ for review and approval a plan for a study of the use of high solids clear coat. The plan must include specific metrics for measuring feasibility. DEQ may reasonably modify the plan to ensure that it includes adequate methods to gauge feasibility. If the permittee concludes that DEQ's modifications are unreasonable, then it must object to them within 10 days, and propose a new plan within 30 days. If DEQ notifies the permittee within 10 days that it will not approve the revised plan, then the parties agree to schedule a meeting within 10 days at which they will negotiate in good faith to reach agreement on a plan.
- 27.c.1. Within 180 days of the date DEQ approves the study plan submitted pursuant to Condition 27.c, conduct a study of the feasibility of conversion to high solids clear coat and submit a report to DEQ on the findings. The report shall contain specific metrics for measuring feasibility so DEQ can make an adequate determination.
- 27.c.2. Within 210 days of the date the high-solids clear coat study is finalized, implement use of high-solids clear coat where Daimler's study determined use was feasible;
- 27.d. Continue to use reduced pressure (RP) spray guns for all surface coating applications at the Facility currently using RP spray guns unless a lower emitting technology is substituted;
- 27.e. By no later than November 22, 2020, develop and implement a robust preventative maintenance (PM) plan for the RP spray guns at the Facility. Upon completion of the PM plan, submit a copy of the plan to DEQ;
- 27.f. Continue to use current VOC-free, high solids chassis coating activator until such time as the paint vendor changes at which time Daimler will use a VOC-free moderate solids (or better) chassis coating activator; and
- 27.g. When any coating is changed or reformulated, evaluate the odor potential of the revised coating compared to existing coating and implement odor mitigation strategies when the revised coating has greater odor potential compared to the existing coating.

28. By no later than August 19, 2021 the permittee must evaluate the use of electrostatic coating technology for chassis surface coating at the Facility and submit an evaluation report to DEQ. If the permittee concludes that electrostatic coating is feasible, safe, and does not result in a significant impact to product quality and durability, then the evaluation report must include a schedule for conversion to electrostatic coating for DEQ's approval and the permittee must immediately begin implementation of the approved schedule. *This condition is only enforceable by the State. [BWPA No. AQ/V-NWR-2019-109 & OAR 340-208-0320 & OAR 340-208-0550]*

SURFACE COATING OF MISCELLANEOUS METAL PARTS AND PRODUCTS NESHAP [40 CFR PART 63 SUBPART MMMM]

29. The permittee must comply with the standard in Condition 30 for all trucks and parts manufactured at the facility. The permittee does not qualify for the exemption under 40 CFR 63.3881(c)(4) due to the definition of military munitions under 40 CFR 260.10.
30. The permittee must limit the organic HAP emissions to no more than 0.31 kg (2.6 lb) organic HAP per liter (gal) coating solids used during each rolling 12-month compliance period at all times. [40 CFR 63.3890(b)(1)]
31. The permittee must use either the compliant material or the emission rate without add-on controls option to demonstrate that the organic HAP content of all coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s) is less than or equal to the limit in Condition 46. [40 CFR 63.3891]
- 31.a. The permittee may apply either of the compliance options listed in Condition 31 to either an individual or multiple coating operation at any time, except when different compliance options are used at the same time on the same coating operation. [40 CFR 63.3891]
- 31.b. If the permittee switches between compliance options, the permittee must report the switch in the next semiannual report as referenced by Condition 100 and as required by Condition 106. [40 CFR 63.3891]
- 31.c. The permittee must comply with all the applicable emission limits, monitoring, recordkeeping, and reporting (MRR) requirements for the compliance options listed in Condition 31. For simplicity, the MRR requirements which apply to both compliance options listed in Condition 31 are grouped together. In addition, specific MRR requirements which apply to the compliance methods listed in Condition 31 are listed separately.
- 31.d. The permittee is not required to re-determine the organic HAP content or the mass of organic HAP in coatings, thinners and /or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has proper documentation showing the exact same materials sent off-site were received back) and re-used in the coating operation. [40 CFR 63.3941 and 63.3951]
- 31.e. No operating limit or work practice standard is applicable when using the compliance options listed in Condition 31. [40 CFR 63.3892(a) and 40 CFR 63.3893(a)]
32. The permittee must determine the mass fraction of organic HAP for each material used by one of the following methods: [40CFR 63.3941(a)]
- 32.a. Method 311 (Appendix A to 40 CFR Part 63):
- 32.a.1. Count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA-defined carcinogens and at 1.0 percent by mass for other compounds as specified in 29 CFR 1910.1200(d)(4).
- 32.a.2. Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions.

- 32.b. Method 24 (Appendix A to 40 CFR Part 60) to determine the mass fraction of non-aqueous volatile matter which may substitute for mass fraction of organic HAP.
- 32.c. An alternative method following the procedure outlined in 40 CFR 63.7(f) and which DEQ approves.
- 32.d. Information from the supplier or manufacturer of the material:
 - 32.d.1. The permittee must include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more for OSHA-defined carcinogens and 1.0 percent by mass for other compounds as specified in 29 CFR 1910.1200(d)(4).
 - 32.d.2. If there is a disagreement between information collected from the manufacturer and the results of a test conducted according to the procedures outlined in 32.a through 32.c, then the test method results will take precedence unless, after consultation, the permittee demonstrates to DEQ's satisfaction that the manufacturer's formulation data is correct.
- 32.e. Solvent blends:
 - 32.e.1. May be listed as single components for some materials in data provided by manufacturers.
 - 32.e.2. May contain organic HAP, which must be counted toward the total organic HAP mass reaction of the materials.
- 32.f. If test or manufacturer's data is not available, the permittee may use the default values for the mass fraction of organic HAP in the solvent blends listed in the tables below.
 - 32.f.1. If the permittee uses the information provided in the tables below, the solvent blend name or chemical abstract series (CAS) number must match.
 - 32.f.2. If the permittee uses Table 1 or Table 2 below, then the permittee must use the values for all solvent blends that match within the table.
 - 32.f.3. If a solvent blend matches at least either the name or CAS number, the permittee must use the organic HAP mass fractions listed in Table 1.
 - 32.f.4. If neither the name nor CAS number match the solvent blend name, the permittee must use the organic HAP mass fractions listed in Table 2.
 - 32.f.5. If the results of a Method 311 test indicate higher values than those listed in Table 1 or Table 2, then the test results take precedence, unless the permittee demonstrates to DEQ that the manufacturer's formulation data are correct.

Table 1: Default Organic HAP Mass Fraction for Solvents and Solvent Blends [40CFR63 Subpart M MMM Table 3]

Solvent/Solvent blend	CAS No.	Average Organic HAP Mass Fraction	Typical Organic HAP, Percent by Mass
1. Toluene	108-88-3	1.0	Toluene
2. Xylene(s)	1330-20-7	1.0	Xylenes, ethylbenzene
3. Hexane	110-54-3	0.5	n-hexane
4. n-Hexane	110-54-3	1.0	n-hexane
5. Ethylbenzene	100-41-4	1.0	Ethylbenzene
6. Aliphatic 140	-----	0	None
7. Aromatic 100	-----	0.02	1% xylene, 1% cumene
8. Aromatic 150	-----	0.09	Naphthalene
9. Aromatic naphtha	64742-95-6	0.02	1% xylene, 1% cumene
10. Aromatic solvent	64742-94-5	0.1	Naphthalene
11. Exempt mineral spirits	8032-32-4	0	None
12. Ligroines (VM & P)	8032-32-4	0	None
13. Lactol spirits	64742-89-6	0.15	Toluene
14. Low aromatic white spirit	64742-82-1	0	None
15. Mineral spirits	64742-88-7	0.01	Xylenes
16. Hydrotreated naphtha	64742-48-9	0	None
17. Hydrotreated light distillate	64742-47-8	0.001	Toluene
18. Stoddard solvent	8052-41-3	0.01	Xylenes
19. Super high-flash naphtha	64742-95-6	0.05	Xylenes
20. Varsol® solvent	8052-49-3	0.01	0.5% xylenes, 0.5% ethylbenzene
21. VM & P naphtha	64742-89-8	0.06	3% toluene, 3% xylene
22. Petroleum distillate mixture	68477-31-6	0.08	4% naphthalene, 4% biphenyl

Table 2: Default Organic HAP Mass Fraction for Petroleum Solvent Groups [40CFR63 Subpart M MMM Table 4]

Solvent Type	Average Organic HAP Mass Fraction	Typical Organic HAP, Percent by Mass
Aliphatic ^a	0.03	1% Xylene, 1% Toluene, and 1% Ethylbenzene
Aromatic ^b	0.06	4% Xylene, 1% Toluene, and 1% Ethylbenzene

^a Mineral Spirits 135, Mineral Spirits 150 EC, Naphtha, Mixed Hydrocarbon, Aliphatic Hydrocarbon, Aliphatic Naphtha, Naphthol Spirits, Petroleum Spirits, Petroleum Oil, Petroleum Naphtha, Solvent Naphtha, Solvent Blend.

^b Medium-flash Naphtha, High-flash Naphtha, Aromatic Naphtha, Light Aromatic Naphtha, Light Aromatic Hydrocarbons, Aromatic Hydrocarbons, Light Aromatic Solvent.

33. The permittee must determine the volume fraction of coating solids for each coating in liters (gal) of coating per liter (gal) for each coating used during the compliance period by either a test, information provided by the manufacturer of the material, or by calculation, as specified below: [40 CFR 63.3941(b)]

33.a. ASTM Method D2697-86 (Reapproved 1998) or ASTM Method D6093-97 (Reapproved 2003).

- 33.a.1. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids.
- 33.a.2. If the results from this test disagree with information obtained by using 33.b through 33.d, then the test results will take precedence unless, after consultation, the permittee demonstrates to DEQ's satisfaction that the manufacturer's formulation data is correct.
- 33.b. Alternative method upon DEQ approval. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- 33.c. Information from the supplier or manufacturer.
- 33.d. Calculation of volume fraction of coating solids using the following equation:

Equation 1

$$V_s = 1 - \frac{m_{volatiles}}{D_{avg}}$$

Where:

- V_s = Volume fraction of coating solids, liters (gal) coating solids per liter (gal) coating.
- $m_{volatiles}$ = Total volatile matter content of the coating, including HAP, VOCs, water, and exempt compounds according to Method 24 in Appendix A of 40 CFR Part 60, grams volatile matter per liter coating.
- D_{avg} = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-98, information from the manufacturer, or reference sources.

In addition, when the permittee uses the compliant material method option, then the permittee must comply with Conditions 34 through 36:

- 34. The permittee must determine if the organic HAP content of each coating used in the coating operation(s) is less than or equal to the limit in Condition 30 and that each thinner and/or other additive, and cleaning material used contains no organic HAP. [40 CFR 63.3891(a)]
- 35. The permittee must determine the density of each coating using one of the following methods: [40 CFR 63.3941(c)]
 - 35.a. ASTM Method D1475-98. If the results from this test disagree with information obtained by using 35.b, then the test results will take precedence unless, after consultation, the permittee demonstrates to DEQ's satisfaction that the formulation data is correct.
 - 35.b. Information from the supplier or manufacturer.
 - 35.c. Specific gravity data for pure chemicals.
- 36. The permittee must determine the organic HAP content of each coating by calculating the organic HAP content, kg (lb) or organic HAP emitted per liter (gal) coating solids used, of each coating used during the compliance period using the following equation: [40 CFR 63.3941(d)]

Equation 2

$$H_c = \frac{(D_c)(W_c)}{V_s}$$

Where:

- H_c = Organic HAP content of the coating, kg organic HAP emitted per liter (gal) coating solids used.

- D_c = Density of coating, kg coating per liter (gal) coating, as determined according to Condition 35.
- W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, as determined according to Condition 32.
- V_s = Volume fraction of coating solids, liter (gal) coating solids per liter (gal) coating, as determined by Equation 1 and described in Condition 33.d.

In addition, when the permittee uses the emission rate without add-on controls option, then the permittee must comply with Conditions 37 through 44:

37. The permittee must limit the organic HAP emission rate for the coating operation, including on all coatings, thinners and/or other additives, and cleaning materials used in the operation is less than or equal to the emission limit in Condition 30. [40 CFR 63.3891(b)]
38. The permittee must calculate the rolling 12-month organic HAP emission rate, not including any coatings, thinners and/or other additives, or cleaning materials used on coating operations for the compliant material option was used. [40 CFR 63.3951]
39. The permittee must determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month from test results using either: [40 CFR 63.3951(c)]
- 39.a. ASTM Method D1475-98 information from the supplier; or
- 39.b. Manufacturer of the material; or
- 39.c. Reference sources providing density or specific gravity data for pure materials.
- 39.d. If the permittee includes powder coatings in the compliance determination, then:
- 39.d.1. Determine the density of powder coatings using ASTM Method D5965-02; or
- 39.d.2. Use information from the supplier.
- 39.d.3. If there is a disagreement between ASTM Method D1475-98 or D5965-02 test results and other information sources, the test results take precedence unless the permittee demonstrates to DEQ the formulation data are correct.
- 39.e. If the permittee purchases materials or monitors consumption by weight instead of volume, then the permittee:
- 39.e.1. Does not need to determine material density; but instead, must
- 39.e.2. Use the material weight in place of the combined terms for density and volume in Equation 4 through Equation 7 and described in Conditions 41.b, 41.c, 41.d, and 43.
40. The permittee must determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. [40 CFR 63.3951(d)]
- 40.a. If the permittee purchases materials or monitors consumption by weight instead of volume, then the permittee,
- 40.a.1. Does not need to determine the volume of each material used; but instead, must
- 40.a.2. Use the material weight in place of combined terms for density and volume in Equation 4 through Equation 7 and described in Conditions 41.b, 41.c, 41.d, and 43.
41. The permittee must calculate the mass of organic HAP emissions using the equation below: [40 CFR 63.3951(e)]

Equation 3

$$H_e = A + B + C - R_w$$

Where:

- H_e = Total mass of organic HAP emissions during the month, kg
- A = Total mass of organic HAP in the coatings used during the month, kg, as calculated in Equation 4 and described in Condition 41.b.
- B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg, as calculated in Equation 5 as described in Condition 41.c.
- C = Total mass of organic HAP in the cleaning materials used during the month, kg, as calculated in Equation 6 and described in Condition 41.d.
- R_w = Total mass of organic HAP in waste materials sent or designated for shipment to a hazardous waste TSDF for treatment or disposal during the month, kg, determined according to Condition 42 (the permittee may assign a value of zero to R_w if they do not wish to use this allowance).

- 41.a. The permittee must include the organic HAP contained in all coatings, thinners and/or other additives, and cleaning materials used during each month minus the organic HAP in certain waste materials.
- 41.b. The permittee must calculate the kg organic HAP in the coatings used during the month using the equation below:

$$A = \sum_{i=1}^m (Vol_{c,i}) (D_{c,i}) (W_{c,i}) \quad \text{Equation 4}$$

Where:

- A = Total mass of organic HAP in the coatings used during the month, kg
- $Vol_{c,i}$ = Total volume of coating, i , used during the month, liters
- $D_{c,i}$ = Density of coating, i , kg coating per liter coating
- $W_{c,i}$ = Mass fraction of organic HAP in coating, i , kg organic HAP per kg coating. For reactive adhesives as defined in 40 CFR 63.3981, use the mass fraction of organic HAP that is emitted as determined using the method described in 40 CFR Part 63 Subpart PPPP, Appendix A
- m = Number of different coatings used during the month

- 41.c. The permittee must calculate the kg of organic HAP in the thinners and/or other additives used during the month using the equation below:

$$B = \sum_{j=1}^n (Vol_{t,j}) (D_{t,j}) (W_{t,j}) \quad \text{Equation 5}$$

Where:

- B = Total mass of organic HAP in the thinners and/or other additives used during the month, kg

- $Vol_{i,j}$ = Total volume of thinner and/or other additive, j , used during the month, liters
- $D_{i,j}$ = Density of thinner and/or other additive, j , kg per liter.
- $W_{i,j}$ = Mass fraction of organic HAP in thinner and/or other additive, j , kg organic HAP per kg thinner and/or other additive. For reactive adhesives as defined in 40 CFR 63.3981, use the mass fraction of organic HAP that is emitted as determined using the method described in 40 CFR Part 63 Subpart PPPP, Appendix A.
- n = Number of different thinners and/or other additives used during the month.

41.d. The permittee must calculate the kg organic HAP in the cleaning materials used during the month using the equation below:

$$C = \sum_{k=1}^p (Vol_{s,k}) (D_{s,k}) (W_{s,k}) \quad \text{Equation 6}$$

Where:

- C = Total mass of organic HAP in the cleaning materials used during the month, kg.
- $Vol_{s,k}$ = Total volume of cleaning material, k , used during the month, liters.
- $D_{s,k}$ = Density of cleaning material, k , kg per liter.
- $W_{s,k}$ = Mass fraction of organic HAP in cleaning material, k , kg organic HAP per kg material.
- p = Number of different cleaning materials used during the month.

42. If accounting for Treatment, Storage, and Disposal Facility (TSDF) waste materials in the determination of organic HAP mass as described in Condition 53, then the permittee:

- 42.a. Must include only the waste materials that are generated by coating operations for which Equation 42, as described in Condition 53, is used.
- 42.b. Must include only the waste materials that will be treated or disposed of by a facility that is regulated as a TSDF.
 - 42.b.1. The TSDF must be defined under 40 CFR Part 262, 264, 265, or 266.
 - 42.b.2. The TSDF may be either off-site or on-site.
 - 42.b.3. No wastewater may be included in the organic HAP mass.
- 42.c. Must determine the amount of waste materials sent to a TSDF during the month or the amount collected and stored during the month and designated for future transport to a TSDF. The permittee need not include materials during a month in which the materials were already included in that month or a previous month's determination.
- 42.d. Must document the methodology used to determine the amount of waste materials and the total mass of organic HAP they contain.

43. The permittee must calculate the total combined volume of coating solids used, in liters, using the equation below: [40 CFR 63.3951(f)]

$$V_{st} = \sum_{i=1}^m (Vol_{c,i})(V_{s,i}) \quad \text{Equation 7}$$

Where:

- V_{st} = Total volume of coating solids used during that month, liters.
- $Vol_{c,i}$ = Total volume of coating, i , used during the month, liters.
- $V_{s,i}$ = Volume fraction of coating solids for coating, i , liter solids per liter coating, determined according to Equation 1 as set out in Condition 33.d.
- m = Number of coatings used during the month.

44. The permittee must calculate the organic HAP emission rate, kg (lb) organic HAP emitted per liter (gal) coating solids used using the following equation: [40 CFR 63.3952(g)]

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n V_{st}} \quad \text{Equation 8}$$

Where:

- H_{yr} = The rolling 12-month average organic HAP emission rate, kg organic HAP emitted per liter coating solids used.
- H_e = Total mass of organic HAP emissions from all materials used during month, y , kg, as calculated by Equation 3 and described in Condition 41.
- V_{st} = Total volume of coating solids used during the month, y , liters, as calculated by Equation 7 and described in Condition 43 of this section.
- y = Month identifier.
- n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

**SURFACE COATING OF PLASTIC PARTS AND PRODUCTS NESHAP [40 CFR PART 63
SUBPART PPPP]**

45. The standards in Condition 46 applies to all trucks and parts manufactured at the facility. The permittee does not qualify for the exemption under 40 CFR 63.4480(c)(3) due to the definition of military munitions under 40 CFR 260.10.
46. The permittee must limit the organic HAP emissions to no more than 0.16 kg (0.16 lb) organic HAP emitted per kg (lb) coating solids used during each rolling 12-month compliance period at all times. [40 CFR 63.4490(b)(1)]
- 46.a. The permittee must use either the compliant material option in Conditions 45, 48, and Conditions 50 through 57 or the emission rate without add-on controls option to demonstrate that the organic HAP content of all coatings, thinners and/or other additives, and cleaning materials used in the coating operation(s) is less than or equal to the limit in Condition 46 as calculated on a 12-month rolling basis and as determined on a monthly basis at all times. [40 CFR 63.4491(a) and (b)]
- 46.b. The permittee may apply either of the compliance options listed in Condition 46.a to either an individual or multiple coating operation at any time, except when different compliance options are used at the same time on the same coating operation. [40 CFR 63.4491]
- 46.c. If the permittee switches between compliance options, it must be reported in the next semiannual report as referenced by Condition 100 and as required by Condition 106. [40 CFR 63.4491]
- 46.d. The permittee must comply with all the applicable emission limits, monitoring, recordkeeping, and reporting (MRR) requirements for the compliance options listed in Condition 46.a. For simplicity, the MRR requirements which apply to both compliance options listed in Condition 46.a are grouped together. In addition, specific MRR requirements which apply to the compliance methods listed in Condition 46.a are listed separately.
- 46.e. The permittee does not need to re-determine the organic HAP content or the mass of organic HAP in coatings, thinners and /or other additives, or cleaning materials that have been reclaimed on-site (or reclaimed off-site if the permittee has proper documentation showing the exact same materials sent off-site were received back) and re-used in the coating operation. [40 CFR 63.4541 and 63.4551]
- 46.f. No operating limit or work practice standard is applicable when using the compliance options listed in Condition 46.a. [40 CFR 63.4493(a) and 40 CFR 63.4492(a)]
- 46.g. Adhesives, sealants, and caulks are not included under 40 CFR Part 63 Subpart PPPP in assembling on-road vehicles. [40 CFR 63.4481(a)(5)]
47. The permittee must determine the mass fraction of organic HAP for each material used by one of the following methods: [40 CFR 63.4541(a) and 40 CFR 63.4551(a)]
- 47.a. Method 311 (Appendix A to 40 CFR Part 63):
- 47.a.1. Count each organic HAP that is measured to be present at 0.1 percent by mass or more for OSHA-defined carcinogens and at 1.0 percent by mass for other compounds as specified in 29 CFR 1910.1200(d)(4).
- 47.a.2. Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions.
- 47.b. Method 24 (Appendix A to 40 CFR Part 60) to determine the mass fraction of non-aqueous volatile matter which may substitute for mass fraction of organic HAP.
- 47.c. An alternative method following the procedure outlined in 40 CFR 63.7(f) and which DEQ approves.
- 47.d. Information from the supplier or manufacturer of the material:
- 47.d.1. The permittee must include in the organic HAP total each organic HAP that is present at 0.1 percent by mass or more as specified in 29 CFR 1910.1200(d)(4).

47.d.2. If there is a disagreement between information collected from the manufacturer and the results of a test conducted according to the procedures outlined in 47.a through 47.c, then the test method results will take precedence unless, after consultation, the permittee demonstrates to DEQ's satisfaction that the formulation data is correct.

47.e. Solvent blends:

47.e.1. May be listed as single components for some materials in data provided by manufacturers.

47.e.2. May contain organic HAP, which must be counted toward the total organic HAP mass reaction of the materials.

47.e.3. If test or manufacturer's data is not available, the permittee may use the default values for the mass fraction of organic HAP in the solvent blends listed in Table 1 and Table 2 and according to Condition 32.f.1 through 32.f.5.

48. The permittee must determine the mass fraction of coating solids (kg (lb) of coating solids per kg (lb) of coating) for each coating used during each month using one of the following options: [40 CFR 63.4541(b) and 40 CFR 63.4551(b)]

48.a. Method 24 (Appendix A to 40 CFR Part 60) to determine the mass fraction of coating solids.

48.b. An alternative method following the procedure outlined in 40 CFR 63.7(f) and which DEQ approves.

48.c. Information from the supplier or manufacturer of the material, see Condition 47.d.2.

In addition to Conditions 45 and 48, when the permittee uses the compliant method option, then the permittee must comply with Condition 49

49. The permittee must calculate the organic HAP content, kg (lb) organic HAP emitted per kg (lb) coating solids used of each coating used during the rolling 12-month period using the equation below. [40 CFR 63.4541(c)]

$$H_c = \frac{W_c}{S_c} \quad \text{Equation 9}$$

Where:

H_c = Organic HAP content of the coating, kg (lb) or organic HAP emitted per kg (lb) coating solids used.

W_c = Mass fraction of organic HAP in the coating, kg organic HAP per kg coating, determined according to Condition 47.

S_c = Mass fraction of coating solids, kg coating solids per kg coating, determined according to Condition 48.

In addition Conditions 45 and 48, when the permittee uses the emission rate without add-on controls option, then the permittee must comply with Conditions 50 through 57:

50. The permittee must determine the density of each liquid coating, thinner and/or other additive, and cleaning material used during each month by either a test, information provided by the manufacturer of the material, or by reference sources providing density or specific gravity data for pure materials as specified below: [40 CFR 63.4551(c)]
 - 50.a. ASTM Method D21475-98. If the results from this test disagree with information obtained by using 50.b through 50.c, then the test results will take precedence unless, after consultation, the permittee demonstrates to DEQ's satisfaction that the formulation data is correct.
 - 50.b. Alternative method upon DEQ approval. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
 - 50.c. Information from the supplier or manufacturer, see Condition 47.d.2.
51. If the permittee purchases materials or monitors consumption by weight instead of volume, then the permittee: [40 CFR 63.4551(c)]
 - 51.a. Does not need to determine material density as required by Condition 50; but instead, must
 - 51.b. Use the material weight in place of the combined terms for density and volume in Equation 4 through Equation 6 and Equation 10, as described in Conditions 41.b, 41.c, 41.d, and 56.
52. The permittee must determine the volume (liters) of each coating, thinner and/or other additive, and cleaning material used during each month by measurement or usage records. [40 CFR 63.4551(d)]
 - 52.a. If the permittee purchases materials or monitors consumption by weight instead of volume, then the permittee does not need to determine the volume of each material used as required by Condition 50; but instead, must
 - 52.b. Use the material weight in place of combined terms for density and volume in Equation 4 through Equation 6 and Equation 10, as described in Conditions 41.b, 41.c, 41.d, and 56.
53. The permittee must calculate the mass of organic HAP emissions using Equation 3 as required in Condition 41 and according to Condition 41.a. [40 CFR 63.4551(e)]
54. The permittee must calculate the kg organic HAP in the coatings used during the month using Equation 5 as required in Condition 41.c. [40 CFR 4551(e)(2)]
55. The permittee must calculate the kg organic HAP in the cleaning materials used during the month using Equation 6 as required in Condition 41.d and according to Condition 42. [40 CFR 4551(e)(3) and (4)]

56. The permittee must calculate the total mass of coating solids used, in kg, using the equation below: [40 CFR 63.4551(f)]

$$M_{st} = \sum_{i=1}^m (Vol_{c,i})(D_{c,i})(M_{s,i}) \quad \text{Equation 10}$$

Where:

- M_{st} = Total mass of coating solids used during that month, kg.
- $Vol_{c,i}$ = Total volume of coating, i , used during the month, liters.
- $D_{c,i}$ = Density of coating, i , kgs per liter coating, determined according to Condition 50.
- $M_{s,i}$ = Mass fraction of coating solids for coating, i , kgs solids per kg coating, determined according to permit Condition 48.
- m = Number of coatings used during the month.

57. The permittee must calculate the organic HAP emission rate on a rolling 12-month basis (as determined monthly), in units of kg (lb) organic HAP emitted per kg (lb) coating solids used. The permittee must not include any coatings, thinners and/or other additives, or cleaning materials used on coating operations for which the compliant material option was used when using the following equation: [40 CFR 63.4551 and 63.4551(g)]

$$H_{yr} = \frac{\sum_{y=1}^n H_e}{\sum_{y=1}^n M_{st}} \quad \text{Equation 11}$$

Where:

- H_{yr} = The rolling 12-month average organic HAP emission rate, kg organic HAP emitted per kg coating solids used.
- H_e = Total mass of organic HAP emissions from all materials used during month, y , kg, as calculated by Equation 3 and described in Condition 41.
- M_{st} = Total mass of coating solids used during the month, y , kg, as calculated by Equation 10 and described in Condition 56 of this section.
- y = Month identifier.
- n = Number of full or partial months in the compliance period (for the initial compliance period, n equals 12 if the compliance date falls on the first day of a month; otherwise n equals 13; for all following compliance periods, n equals 12).

TESTING REQUIREMENTS

58. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120]
- 58.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to DEQ at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for DEQ to grant approval and may require EPA approval in addition to approval by DEQ.
- 58.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
- 58.c. Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:
- 58.c.1. At least 90% of the design capacity for new or modified equipment;
- 58.c.2. At least 90% of the maximum operating rate for existing equipment; or
- 58.c.3. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
- 58.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, DEQ may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 58.e. Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to DEQ within 45 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

MONITORING REQUIREMENTS

The monitoring conditions in this section are based on OAR 340-218-0050(3)(a); unless otherwise specified.

59. Unless otherwise specified in this permit or an applicable requirement, DEQ is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of "opacity" and "particulate matter" in OAR 340-208-0010 and perform the testing in accordance with DEQ's Source Sampling Manual.

GENERAL MONITORING REQUIREMENTS

60. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
61. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0050(3)(a)(F)]

62. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

FACILITY WIDE MONITORING REQUIREMENTS

63. At least once each month for a minimum period of 30 minutes at the TMP facility and 10 minutes at the PMP facility, the permittee must visually survey the plant for any sources of visible emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the plant site boundaries. The person conducting the observation does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions.
- 63.a. If sources of visible emissions are identified, the permittee must:
- 63.a.1. Immediately take corrective action to minimize the visible emissions, including but not limited to those actions identified in Condition 7; or
- 63.a.2. An EPA method 9 certified observer must monitor and record the opacity of each source of visible emissions in accordance with EPA Method 9 within 14 working days. The visible emission inspection must be performed during normal plant operations.
- 63.b. If the observer is unable to conduct the survey and/or EPA Method 9 tests due to visual interferences caused by other visible emissions sources or due to weather conditions, the observer must note such conditions on the data observation sheet and make at least three attempts to conduct the survey and/or tests at approximately 2 hour intervals. If no observations are made for that day, the observer must continue to attempt to conduct the inspection and/or EPA Method 9 tests daily until a valid observation is made.
- 63.c. Each EPA Method 9 test must be conducted for a minimum period of six minutes. If any of the observations exceed the applicable opacity limit for the emission source, the observation period must continue until 60 minutes of observations have been completed or until an exceedance of the applicable condition has been documented.
- 63.d. The permittee must maintain records of all visible emission survey and the results, as well as all Method 9 readings and results, if required;
64. The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is only enforceable by the state. [OAR 340-218-0050(3)(a)]

EMISSIONS UNIT SPECIFIC MONITORING

65. The permittee must maintain a log recording all written complaints, or complaints received via telephone or facsimile, that specifically refers to a complaint of odor from the permitted facility for monitoring pertaining to Condition 6. The log must also record permittee's actions to investigate the complaint, and actions taken resolve the complaint, if any. The monitoring in Condition 65 is only enforceable by the state.
66. The permittee must conduct monitoring pertaining to Conditions 8 and 9 by maintaining a list of all Class I and Class II substances (as defined within 40 CFR Part 82) used in the manufacture of or contained within any product incorporated into any product of this facility.

Monitoring Requirements for Emissions Units 1-AC and 2-AC All Coating Application at the TMP and PMP

67. For monitoring pertaining to Conditions 11 (opacity less than 20%) and Condition 12 (grain loading less than 0.14 gr/dscf), the permittee must perform the visible emission inspection as required by Condition 63.

68. The permittee must conduct monitoring pertaining to Condition 14 (RACT) at the TMP and PMP as follows:

68.a. On days when each coating used individually meets the RACT limits in Condition 14 the permittee must maintain a current list of all coatings used at the TMP and PMP including but not limited to the following information for each coating:

Coating List

- 68.a.1. Coating Name and Identification
- 68.a.2. Base, coating catalyst, and reducer used, excluding tints;
- 68.a.3. Mix Ratio of base and catalyst used, excluding tints;
- 68.a.4. VOC content of coating as applied, excluding water

68.b. On days when any coating used* at the facility exceeds the RACT limits in Condition 14, the permittee must maintain a log of all coatings used at the TMP and PMP including, but not limited to the following information for each coating:

Coating Log

- 68.b.1. Coating name and identification;
- 68.b.2. RACT type**;
- 68.b.3. Quantity of each coating used, in gallons.
- 68.b.4. The VOC content*** of each coating as applied, in lbs-VOC/gallon, excluding water.

*Coatings mixed by the mixing machine(s) must be considered used when they are dispensed.

**RACT type means CC, FA, EP, or OC, as described below.

***The permittee must use the VOC content supplied by the manufacturer on the MSDS Sheet or other manufacturer supplied information, for emissions calculations.

68.c. The permittee must perform the following calculations in addition to maintaining the coating log on days when any coating used at the facility exceeds the RACT limit:

RACT Calculation

68.c.1. The permittee must calculate actual VOC emissions and RACT allowable VOC emissions using the information below and Equation 12 in order to monitor compliance:

Actual VOC emissions = the sum total of VOCs emitted from each coating listed on the coating list, which is: gallons used x lbs-VOC/per gallon

RACT allowable VOC emissions =

$$(CC \times 4.3) + ((FA + EP) \times 3.5) + (OC \times 3.0) \quad \text{Equation 12}$$

Where:

CC = Clear Coatings (gallons, excluding water)

- FA* = Forced Air Dried or Air Dried Coatings (gallons, excluding water) with a cure temperature of 194°F or less as designated by the manufacturer.
- EP* = Extreme Performance Coatings (gallons, excluding water)
- OC* = Other Coatings (gallons, excluding water), including those with a cure temperature higher than 194°F, as designated by the manufacturer.

68.c.2. For purposes of determining compliance with the daily RACT, a day is a 24 hour period. The permittee may choose to start the 24 hour period at any time of day. When the starting time is changed, the permittee must notify DEQ in writing within 7 days of changing the starting time.

68.d. The permittee is in compliance with Condition 14 on days when only RACT compliance coatings are used, or on days when Actual VOC emissions do not exceed the RACT allowable VOC emissions.

Monitoring Requirements For Emissions Unit 5-BO Natural Gas Combustion Devices

69. The permittee must conduct monitoring pertaining to Condition 15 (opacity less than 20%) and Condition 16 (grain loading less than 0.14 gr/dscf) by only burning natural gas in the devices included in EU ID 5-BO and must monitor all fuel used in the devices in accordance with the requirements of Condition 70.

MONITORING REQUIREMENTS FOR THE PLANT SITE EMISSION LIMITS

70. Each month, the permittee must determine compliance with the Plant Site Emission Limits (PSELs) in Condition 24 or 25, and the surface coating limit in Condition 26, as applicable, and as required by the following:

- 70.a. The permittee must monitor and record the Monitored Parameters listed in Table 3 and must determine compliance with the PSELs by:
 - 70.a.1. Calculating the monthly emissions from each emissions unit listed below, by pollutant;
 - 70.a.2. Calculating the emissions for the preceding 12 calendar month period, by pollutant; and
 - 70.a.3. Completing the calculations required by this condition for the preceding month not later than the end of the following month.
- 70.b. Emissions from the emissions units listed in Table 3 must be calculated using Equation 13 for each pollutant.

$$E = MP \times EF \quad \text{Equation 13}$$

Where:

- E* = Emissions
- MP* = Monitored Parameter
- EF* = PSEL Emission Factor

Table 3: PSEL Emission Factors:

EU ID	Pollutant	PSEL Emission Factor *	Monitored Parameter (Monthly value)	Parameter Units
1-AC	PM/ PM ₁₀ /PM _{2.5}	0.033 Lb/Lb paint solids	Paint solids	Lbs - paint solids
2-AC	PM/ PM ₁₀ /PM _{2.5}	0.033 Lb/Lb paint solids	Paint solids	Lbs - paint solids
5-BO	PM/ PM ₁₀ /PM _{2.5} SO ₂ NO _x CO VOC	0.012 Lb/Million BTU 0.0026 Lb/Million BTU 0.1 Lb/Million BTU 0.021 Lb/Million BTU 0.0073 Lb/Million BTU	Natural gas use Natural gas use Natural gas use Natural gas use Natural gas use	Million BTU/month Million BTU/month Million BTU/month Million BTU/month Million BTU/month

* The PSEL EFs are not enforceable as emission limitations or standards.

70.b.1. The monthly paint solids is the total of the monthly paint solids in the paint purchased each month minus the monthly quantity of paint solids disposed offsite.

70.b.2. The monthly natural gas use is the total natural gas consumption of all devices included in EU ID 5-BO.

70.c. The permittee must determine monthly VOC emissions from EU ID 7-VOC (non-combustion VOCs) by:

70.c.1. Monitoring the monthly quantity of VOCs containing coatings purchased [total and those subject to surface coating limit], and

70.c.2. Performing the following calculations as set out in $(\sum_{i=1}^n Qi \times VOCi) - (VOC_{waste})$ Equation 14 for each calendar month:

Monthly VOC emissions =

$$(\sum_{i=1}^n Qi \times VOCi) - (VOC_{waste}) \text{ Equation 14}$$

Where:

Qi = Amount of VOC-containing product i (gal) purchased in the calendar month

$VOCi$ = VOC content of product i. (lb/gal)

VOC_{waste} = monthly VOC waste shipped offsite (as set out in $M_{dis} \times VOC_{dis}$ Equation 15)

Total Waste Shipped Off-Site =

$$M_{dis} \times VOC_{dis} \text{ Equation 15}$$

Where:

M_{dis} = Weight of VOC containing waste shipped off site.

$\%VOC_{dis}$ = VOC content of waste (lb per lb).

- 70.d. On and after January 1, 2023 the permittee must determine, using the material balance calculations in Condition 70.c, the rolling 12 consecutive month VOC emissions from surface coating operations as defined by Condition 26. These emissions must be compared to the rolling 12 consecutive month limit in Condition 26. If credit for waste shipped off-site is to be included in the VOC emission calculation, the permittee must demonstrate the quantity and VOC content associated with the surface coating operations.

NESHAP MONITORING REQUIREMENTS FOR SUBPART MMMM: [40 CFR Part 63 Subpart MMMM]

When the permittee uses the compliant method option, then:

71. The permittee must demonstrate compliance by not using any coatings for which the organic HAP content, determined by using Equation 2 and set out in Condition 36, exceeds the limit in Condition 30. [40 CFR 63.3891(a)]
72. The permittee must not use any thinner and/or other additive, or cleaning material which contains organic HAP, as determined in Condition 36 or thru evaluation of SDSs, based on a 12-month period. [40 CFR 63.3891(a)]
73. The use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria set out in Condition 32 is considered a deviation and must be reported as such and as outlined in Condition 96. [40 CFR 63.3942(b)]

When the permittee uses the emission rate without add-on controls option, then:

74. The permittee must demonstrate compliance by calculating the organic HAP emission rate based on a rolling 12-month period. The calculations as set out in Conditions 53 through 57 must be calculated on a monthly basis using data from that month and the preceding 11 months of operation. [40 CFR 63.3891(b)]
75. Any organic HAP emission rate for any rolling 12-month period which exceeds the emission limit as set out in Condition 46 is considered a deviation and must be reported as such and as outlined in Condition 96. [40 CFR 63.3952(b)]

NESHAP MONITORING REQUIREMENTS FOR SUBPART PPPP: [40 CFR Part 63 Subpart PPPP]

When the permittee uses the compliant method option, then:

76. The permittee must demonstrate compliance by not using any coatings for which the organic HAP content, as determined by using Equation 9 and set out in Condition 49, exceeds the limit in Condition 46. [40 CFR 63.4542(a)]
77. The permittee must not use any thinner and/or other additive, or cleaning material which contains organic HAP, as determined in Condition 47 or thru evaluation of SDSs based on a 12-month period. [40 CFR 63.4542(a)]

78. The use of any coating, thinner and/or other additive, or cleaning material that does not meet the criteria set out in Condition 47 is considered a deviation and must be reported as such and as outlined in Condition 96. [40 CFR 63.4542(b)]

When the permittee uses the emission rate without add-on controls option, then:

79. The permittee must demonstrate compliance by calculating the organic HAP emission rate based on a rolling 12-month period. The calculations as set out in Conditions 53 through 57 must be calculated on a monthly basis using data from that month and the preceding 11 months of operation. [40 CFR 63.4552(a)]
80. Any organic HAP emission rate for any rolling 12-month period which exceeds the emission limit as set out in Condition 46 is considered a deviation and must be reported as such and as outlined in permit Condition 96. [40 CFR 63.4552(b)]

RECORDKEEPING

The recordkeeping conditions in this section are based on OAR 340-218-0050(3)(b); unless otherwise specified.

General Recordkeeping Requirements

81. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]
- 81.a. The date, place as defined in the permit, and time of sampling or measurements;
 - 81.b. The date(s) analyses were performed;
 - 81.c. The company or entity that performed the analyses;
 - 81.d. The analytical techniques or methods used;
 - 81.e. The results of such analyses;
 - 81.f. The operating conditions as existing at the time of sampling or measurement; and
 - 81.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
82. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [OAR 340-214-0110, 340-214-0114, and 340-218-0050(3)(b)]
83. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
84. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [OAR 340-218-0050(b)(B)]

85. The permittee must maintain the following specific records of required monitoring information that include the following:
- 85.a. Monthly records of truck production;
 - 85.b. Daily coating logs, as required;
 - 85.c. Records of the RACT calculation for days when performed;
 - 85.d. Records of quarterly odor audits;
 - 85.e. Records of semi-annual visible emission inspections;
 - 85.f. Monthly records of natural gas used;
 - 85.g. The manufacturer's efficiency rating of the particulate control filters used in all paint spray booths;
 - 85.h. Monthly records of non-coating VOCs used;
 - 85.i. Monthly records of the VOC-containing product use and monthly per truck;
 - 85.j. Monthly and rolling 12-month plant-wide VOC emissions;
 - 85.k. Monthly and rolling 12 month surface coating VOC emissions (beginning January 1, 2023);
 - 85.l. Monthly paint solids used;
 - 85.m. Monthly non-VOC HAPs used;
 - 85.n. Monthly paint solids contained in paint waste disposed offsite;
 - 85.o. Monthly quantities of VOCs contained in waste disposed off site;
 - 85.p. Monthly quantities of VOCs from surface coating operations contained in waste disposed off site (beginning January 1, 2023);
 - 85.q. A list of all Class I and Class II substances (as defined within 40 CFR Part 82) used in the manufacture of or contained within any product incorporated into any product of this facility.
 - 85.r. Records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 9 tests;
 - 85.s. Type and amount of fuels; and
 - 85.t. Proof or manufacturer certification that the spark ignition emergency engine complies with 40 CFR 60 Subpart JJJJ

Source Specific Recordkeeping Requirements

86. Source specific recordkeeping requirements:
- 86.a. The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 9 tests.
 - 86.b. Type and amount of fuels

RECORDKEEPING REQUIREMENTS FOR THE PLANT SITE EMISSION LIMITS:

87. The permittee must maintain the following records on a monthly basis for VOC_{waste} as set out in Condition 70.c for any month the permittee chooses to subtract the VOC_{waste} from the VOC emissions:
- 87.a. Records of the total weight of VOC containing wastes shipped offsite,
 - 87.b. Records of the total weight of VOC containing wastes from surface coating operations shipped offsite (beginning January 1, 2023,
 - 87.c. Records of chemical analyses of a representative sample of waste shipped off site showing percentage VOC content.
 - 87.d. Records of chemical analyses of a representative sample of surface coating waste shipped off site showing percentage VOC content (beginning January 1, 2023).
88. The permittee must maintain the following records on a monthly basis as set out in Condition 70.c:
- 88.a. Usage records of miscellaneous VOC (other than VOC in coatings) coating usage

- 88.b. The name and quantity of each VOC containing product or coating used, in gallons or lbs.
- 88.c. The name and quantity of each VOC containing product or coating used for surface coating, in gallons or lbs (beginning January 1, 2023).
- 88.d. The VOC content of each VOC containing product or coating in lbs-VOC/gal or lbs-VOC/lb, (based on Safety Data Sheets or other representative information).

NESHAP RECORDKEEPING REQUIREMENTS FOR SUBPART MMMM: [40 CFR Part 63 Subpart MMMM]

- 89. The permittee must maintain the following records for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must maintain the records on site for two (2) years in such a manner that they may be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining three (3) years: [40 CFR 63.3930 (a) through (j) and 40 CFR 63.3931(a) through (c)]
 - 89.a. A copy of each notification and report submitted pertaining to compliance with 40 CFR 63 Subpart MMMM.
 - 89.b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating.
 - 89.c. If testing was conducted to determine mass fraction of organic HAP, density, or volume fraction of coating solids, the permittee must keep a copy of the test report.
 - 89.d. If manufacturer information used was based on testing, the permittee must keep a copy of the summary sheet of results provided by the manufacturer.
 - 89.e. A record of each coating operation, time period, and the compliance option used for each operation used.
 - 89.f. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
 - 89.g. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each 12-month period unless the material is tracked by weight.
 - 89.h. A record of the volume fraction of coating solids for each coating used during each compliance period as specified in Conditions 71 and 74.
 - 89.i. Records of the date, time, and duration of each deviation.

In addition to the recordkeeping requirements in Condition 89, when the permittee uses the compliant method option, then:

- 90. The permittee must keep the following records for each compliance period: [40 CFR 63.3930(c)(2) and (d)]
 - 90.a. A record of the calculation of the organic HAP content for each coating as calculated using the Equation 2 in Condition 36.
 - 90.b. The permittee may maintain purchase records for each material used rather than a record of the volume used in order to comply with Condition 92.f.

In addition to the recordkeeping requirements in Condition 89, when the permittee uses the emission rate without add-on controls option, then:

- 91. The permittee must keep the following records for each compliance period: [40 CFR 63.3930(c)(3) and (g) through (h)]

- 91.a. A record of the calculation of the total mass of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equation 3 through Equation 7.
- 91.b. The calculation used to determine mass of organic HAP in waste materials as set out in Condition 42, if applicable.
- 91.c. If the permittee uses an allowance, R_w , in Equation 3, as set out in Condition 41, then the permittee must also keep the following records:
 - 91.c.1. The name and address of each TSDF where the waste materials were sent;
 - 91.c.2. The date of each shipment;
 - 91.c.3. A statement of which Subparts specified under Condition 42.b.1 apply to the facility;
 - 91.c.4. The identification of the coating operation which produced waste materials included in each shipment, as well as, the month(s) in which it occurred;
 - 91.c.5. The methodology used, in accordance with Condition 42, to determine the following:
 - 91.c.5.1. The total amount of waste materials sent to or the amount collected, stored, and designated for transport to a TSDF each month;
 - 91.c.5.2. The mass of organic HAP contained in the waste materials, including:
 - 91.c.5.2.1 Sources for all data used in the determination,
 - 91.c.5.2.2 Methods used to generate the data,
 - 91.c.5.2.3 Frequency of testing or monitoring, and
 - 91.c.5.2.4 Supporting calculations and documentation, including the waste manifest for each shipment.
- 91.d. The calculation of the total volume of coating solids used each month using Equation 10 as described in Condition 56.
- 91.e. The calculation of each 12-month organic HAP emission rate using Equation 11 as described in Condition 57.
- 91.f. The density for each coating, thinner and/or other additive, and cleaning material used during each rolling 12-month period.

NESHAP RECORDKEEPING REQUIREMENTS FOR SUBPART PPPP: [40 CFR Part 63 Subpart PPPP]

- 92. The permittee must maintain the following records for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must maintain the records on site for two (2) years in such a manner that they may be readily accessed and are suitable for inspection according to 40 CFR 63.10(b)(1). The permittee may keep the records off-site for the remaining three (3) years: [40 CFR 63.4530 (a) through (h) and 40 CFR 63.4531(a) through (c)]
 - 92.a. A copy of each notification and report submitted pertaining to compliance with 40 CFR 63 Subpart PPPP.
 - 92.b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the mass fraction of coating solids for each coating.
 - 92.c. If testing was conducted to determine mass fraction of organic HAP, density, or mass fraction of coating solids, the permittee must keep a copy of the test report.
 - 92.d. If manufacturer information used was based on testing, the permittee must keep a copy of the summary sheet of results provided by the manufacturer.
 - 92.e. A record of each coating operation, time period, and the compliance option used for each operation used.
 - 92.f. A record of the name and mass of each coating, thinner and/or other additive, and cleaning material used during each compliance period.
 - 92.g. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each 12-month period.

92.h. A record of the mass fraction of coating solids for each coating used during each compliance period.

92.i. Records of the date, time, and duration of each deviation.

In addition to the recordkeeping requirements in Condition 92, when the permittee uses the compliant method option, then:

93. The permittee must keep the following records for each compliance period: [40 CFR 63.4530(c)(2)]

93.a. A record of the calculation of the organic HAP content for each coating, using Equation 9 as set out in Condition 49.

93.b. If the permittee uses an allowance, R_w , in Equation 3, as set out in Condition 41, then the permittee must also keep the records set out in Condition 91.c.

In addition to the recordkeeping requirements in Condition 92, when the permittee uses the emission rate without add-on controls option, then:

94. The permittee must keep the following records for each compliance period: [40 CFR 63.4530(c)(3)]

94.a. A record of the calculation of the density of organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month as required by Condition 50 or the volume of each coating, thinner and/or other additive, and cleaning material used each month as required by Condition 52;

94.b. A record of the calculation of the total mass or organic HAP emissions for the coatings, thinners and/or other additives, and cleaning materials used each month using Equation 3 through Equation 6 and Equation 10 in Condition 41 and Condition 56, and, if applicable, the calculation used to determine mass of organic HAP in waste materials according to Condition 42.

94.c. The calculation of the total mass of coating solids used each month using Equation 10, as set out in Condition 56.

94.d. The calculation of each 12-month organic HAP emission rate using Equation 11 as set out in Condition 57.

REPORTING REQUIREMENTS

The reporting conditions in this section are based on OAR 340-218-0050(3)(c); unless otherwise specified.

95. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]

95.a. Immediately (within 1 hour of the event) notify DEQ of an excess emission event by phone, email, or facsimile; and

95.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]

95.b.1. 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;

95.b.2. The date and time the permittee notified DEQ of the event;

95.b.3. The equipment involved;

95.b.4. Whether the event occurred during startup, shutdown, maintenance, or as a result of a breakdown, malfunction, or emergency;

95.b.5. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;

- 95.b.6. 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);
- 95.b.7. The final resolution of the cause of the excess emissions; and
- 95.b.8. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.
- 95.c. 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. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).
- 95.d. 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 DEQ by calling the Oregon Emergency Response System (OERs). The current number is 1-800-452-0311.
- 95.e. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to DEQ for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by DEQ 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.
- 95.f. Once DEQ approves startup/shutdown procedures, the permittee must notify DEQ of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if it results in excess emissions. When notice is required by this condition, it must be made in accordance with Condition 95.95.a.
- 95.g. The permittee must continue to maintain a log of all excess emissions in accordance with OAR 340-214-0340(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
96. Permit Deviations Reporting: The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in OAR 340-214-0300 through 340-214-0360 must be reported in accordance with Condition 95. [OAR 340-218-0050(3)(c)(B)]
97. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
98. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
- NESHAP REPORTING REQUIREMENTS FOR SUBPART MMMM: [40 CFR Part 63 Subpart MMMM]
99. The permittee must submit the following information semiannually as required by Condition 107 to demonstrate continuous compliance: [40 CFR 63.3920]
- 99.a. Identification of the compliance option(s) for each coating operation during the reporting period.

- 99.b. If the permittee switched between the compliance options specified in Condition 46.a, the beginning and ending dates for each option used.
- 99.c. If there were no deviations from any emission limitations as set out in Condition 46 during the reporting period, the permittee must include a statement in the semiannual report as required by Condition 106.

In addition, when the permittee uses the compliant material option, then:

- 100. The permittee must submit the following compliance report containing the following information semi-annually: [40 CFR 63.3942(c)]
 - 100.a. If there was no deviation from the limit set out in Condition 46, then the permittee must submit a statement that the coating operation(s) were in compliance with the emission limitations set out in Condition 46 during the reporting period because no coatings, thinners and/or other additives, or cleaning materials were used for which the organic HAP content exceeded the emission limit in Condition 46.
 - 100.b. If a deviation occurred during the reporting period, the permittee must include the following with the semiannual report required by Condition 106: [40 CFR 63.3920(a)(5) and 63.3910(c)(6)]
 - 100.b.1. A description and statement of the cause of each deviation.
 - 100.b.2. The identification of each coating used that deviated from the emission limit set out in Condition 46 and each thinner and/or additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used.
 - 100.b.3. The calculation of the organic HAP content for each coating under 100.b.2.
 - 100.b.4. The mass fraction of organic HAP for each thinner and/or other additive, and cleaning material under 100.b.2.

In addition, when the permittee uses the emission rate without add-on controls option, then:

- 101. The permittee must submit the following compliance report containing the following information semi-annually: [40 CFR 63.3952(c) and 63.3920(a)(3)(v)]
 - 101.a. If there was no deviation from the limit set out in Condition 46, then the permittee must submit a statement that the coating operation(s) were in compliance with the emission limitations set out in Condition 46 during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to emission limit in Condition 46.
 - 101.b. The calculation results for each rolling 12-month organic HAP emission rate during the 6 month reporting period, as specified in Condition 106.
 - 101.c. If a deviation occurred during the reporting period, the permittee must include the following with the semiannual report required by Condition 106: [40 CFR 63.3920(a)(6)]
 - 101.c.1. A description and statement of the cause of each deviation.
 - 101.c.2. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in Condition 46.
 - 101.c.3. The calculations from Equation 3 through Equation 8 used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred.
 - 101.c.4. The calculation used to determine mass of organic HAP in waste materials as set out in Condition 42, if applicable. The permittee does not need to submit background data such as MSDS reports, supporting these calculations.

NESHAP REPORTING REQUIREMENTS FOR SUBPART PPPP: [40 CFR Part 63 Subpart PPPP]

102. The permittee must submit the following information semiannually to demonstrate continuous compliance as required by Condition 106: [40 CFR 63.4542(c) and 63.4520(a)(3)(v)]
- 102.a. Identification of the compliance option for each coating operation during the reporting period.
 - 102.b. If there was no deviation from the limit set out in Condition 46, then the permittee must submit a statement that the coating operation(s) were in compliance with the emission limitations set out in Condition 46 during the reporting period because the organic HAP emission rate for each compliance period was less than or equal to emission limit in Condition 46.
 - 102.c. Results for each rolling 12-month organic HAP emission rate during the 6-month reporting period, as specified in permit Condition 106.

In addition, when the permittee uses the compliant material option, then:

103. If a deviation occurred during the reporting period, the permittee must include the following with the semiannual report required by permit Condition 106: [40 CFR 63.3920(a)(6)]
- 103.a. A description and statement of the cause of each deviation.
 - 103.b. The beginning and ending dates of each compliance period during which the 12-month organic HAP emission rate exceeded the emission limit in Condition 46.
 - 103.c. The calculations used to determine the 12-month organic HAP emission rate for the compliance period in which the deviation occurred.
 - 103.d. The calculation used to determine mass of organic HAP in waste materials as set out in Condition 42, if applicable. The permittee does not need to submit background data such as MSDS reports, supporting these calculations.

ALTERNATIVE COMPLIANCE TRACKING METHOD FOR NESHAP SUBPART MMMM AND SUBPART PPPP COMBINED [40 CFR 63.3980 and 40 CFR 63.4580]

104. If the permittee uses the same coating compounds on the metal and plastic parts that are coated, and coatings specific to metal or plastic are not used, compliance with the emission standards in NESHAP Subparts MMMM and PPPP may be demonstrated by assuming all of the coating compounds were used on the metal parts; then assuming that all of the coating compounds were used on the plastic parts. This will allow for compliance demonstration when the exact amount of coating applied to each type of part (metal and plastic) cannot be accurately tracked, but the total amount of each coating can be tracked.
105. If coatings specific* to metal or plastic parts are used, they must be tracked separately and compliance with the applicable NESHAP must be demonstrated for those coatings. Coating unique to plastic parts should not be included in the compliance calculation for subpart MMMM; and coating unique to metal parts should not be included in the compliance calculation for subpart PPPP.
- *specific to metal means 90% or more applied to metal parts; specific to plastic means 90% or more applied to plastic parts
106. The permittee must record the substrate each coating is applied to; metal, plastic or both.

Semi-annual and Annual Reports

107. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by DEQ. Six month periods are January 1 to June 30, and July 1 to December 31. One paper copy of the report must be submitted to the EPA and two copies (one paper copy and one electronic copy) to the DEQ regional office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]

- 107.a. The first semiannual report is due July 30 and consists of the semiannual compliance certification. [OAR 340-218-0080]
- 107.b. The annual report is due on February 15 and must consist of the following:
- 107.b.1. Plant-wide 12-month rolling VOC, PM, PM₁₀ and PM_{2.5} emissions for each month of the reporting year;
 - 107.b.2. The 12-month rolling coating and solvent materials used for each month recorded on DEQ approved forms;
 - 107.b.3. The 12-month non-coating VOC emissions for each month of the reporting year;
 - 107.b.4. The 12-month rolling VOC emissions calculated for each month of the reporting year;
 - 107.b.5. Surface coating 12-month rolling VOC emissions for each month of the reporting year (*beginning January 1, 2023*);
 - 107.b.6. Quantities and types of fuels used on an annual basis;
 - 107.b.7. The rolling 12-month truck production for each month of the reporting year;
 - 107.b.8. Monthly non-VOC HAP use;
 - 107.b.9. Miscellaneous VOC materials used monthly, recorded on DEQ approved forms;
 - 107.b.10. A copy of the complaint log as set out in Condition 64;
 - 107.b.11. The emission fee report; [OAR 340-220-0100]
 - 107.b.12. The excess emissions upset log as set out in Condition 95; [OAR 340-214-0340]
 - 107.b.13. The annual certification that the risk management plan is being properly implemented, OAR 340-244-0230; [OAR 340-218-0080(7)]
 - 107.b.14. The second semiannual compliance certification as set out in Condition 107.b. [OAR 340-218-0080]
 - 107.b.15. All applicable reports pertaining to NESHAP MACT standards MMMM and PPPP as outlined in Conditions 99 through 103.
108. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
- 108.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 108.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference into the permit. When certifying compliance with new applicable requirements that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the owner or operator must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
 - 108.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in OAR 340-218-0040(6)(c)(B). The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0010, occurred; and
 - 108.d. Such other facts as DEQ may require to determine the compliance status of the source.

- 108.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]
- 109. Greenhouse Gas Registration and Reporting: If the calendar year emission rate of greenhouse gases (CO₂e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5).
- 110. Addresses of regulatory agencies are the following, unless otherwise instructed:

DEQ – Northwest Region AQ
700 NE Multnomah St. #600
Portland, OR 97232
(503) 229-5263

DEQ – Air Quality Division
700 NE Multnomah St. #600
Portland, OR 97232
(503) 229-5263

Air Operating Permits
US Environmental Protection Agency
Mail Stop OAQ-108
1200 Sixth Avenue
Seattle, WA 98101

NON-APPLICABLE REQUIREMENTS
[OAR 340-218-0110]

- 111. State and Federal air quality requirements (e.g., rules and regulations) currently determined not applicable to the permittee are listed below along with the reason for the non-applicability: [OAR 340-218-0110]

Applicable Requirement	Reason Code
OAR 340-210-0100 through 0120	b
OAR 340-218-0050(4)	b
OAR 340-218-0090	b
OAR 340-218-0100	b
OAR 340-234-0200 through 0270	b
OAR 340-234-0300 through 0360	b
OAR 340-234-0400 through 0430	b
OAR 340-234-0500 through 0530	b
OAR 340-236-0100 through 0150	b
OAR 340-236-0200 and 0230	b
OAR 340-236-0300 through 0330	b
OAR 340-236-0400 through 0440	b
OAR 340-236-0500	b
OAR 340-244-0100 through 0200	b
OAR 340-256-0130 through 0140	b
OAR 340-256-0200 through 0470	b
OAR 340-258-0100 through 0310	b
OAR 340-258-0400	b
OAR 340-260-0010 through 0040	b
40 CFR part 55	b
40 CFR part 57	b
40 CFR part 60 (except subparts A, JJJJ and all Appendices)	b
40 CFR part 61 (except subpart A, M and all Appendices)	b
40 CFR part 63 (except subpart A, MMMM, PPPP, ZZZZ and all Appendices)	b
40 CFR part 72	b
40 CFR part 73	b
40 CFR part 75	b
40 CFR part 76	b
40 CFR part 77	b
40 CFR part 78	b
40 CFR part 82 (except subpart F)	b
40 CFR part 85 through 89	b
OAR 340-232-0040 through 0150	b or c
OAR 340-232-0170 through 0230	b or c
OAR 340-242-0500 through 520	b or c
OAR 340-242-0600 and 0630	b or c
OAR 340-242-0700 through 0750	b or c
OAR 340-242-0760 through 0790	b or c
OAR 340-240-0150	b or c
OAR 340-240-0170	b or c
OAR 340-242-0400 through 0440	c
OAR 340-240-0100 through 0250	c
OAR 340-240-0300 through 0360	c
OAR 340-240-0500 through 0560	c
OAR 340-240-0570 through 0630	c
OAR 340-240-0400 through 0440	c
OAR 340-208-570	c or e

Applicable Requirement	Reason Code
OAR 340-240-0110 through 0140	c or e
OAR 340-240-0160	c or e
OAR 340-240-0240	c or e
OAR 340-240-0320 and 0330	c or e
OAR 340-240-0350	c or e
OAR 340-226-0310 through 0320	e
OAR 340-234-0100 through 0140	e
OAR 340-Division 230	e
OAR 340-238-0060 through 0080	e
OAR 340-238-0100	e
OAR 340-228-0200 through 0210	e
228-0100 through 0130	f
226-0400	h
222-0040	h
222-0042	h
222-0045	h
222-0060	h
222-0070	h
222-0090	h
218-0050(8)	h
244-0100	h
268	h
212-0210 through 0280	h
202-all rules	i

Reason code definitions:

- b - the facility is not in this source category
- c - the facility is not in a special control/non attainment area
- e - the facility does not have this emissions unit
- f - the facility does not use this fuel type
- h - this method/procedure is not used by the facility
- i - this rule applies only to DEQ and regional authorities

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in this permit have the meaning assigned to such terms in the referenced regulation.

G2. Reference materials

Where referenced in this permit, the versions of the following materials are effective as of the dates noted unless otherwise specified in this permit:

- a. Source Sampling Manual; November 15, 2018.
- b. Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Applicable Requirements

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee must comply with all conditions of this permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance is supplemental to, and does not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission 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. [OAR 340-208-0400] This condition is enforceable only by the State.

G6. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G7. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to DEQ or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness.

All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to DEQ a material error or omission in these records, reports, plans, or other documents.

G8. Open Burning [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0200.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit is deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. Such applicable requirements are included and are specifically identified in the permit, or
 - ii. DEQ, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit alters or affects the following:
 - i. The provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. The liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. The applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
 - iv. The ability of DEQ to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).

- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by DEQ.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow DEQ, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where an Oregon Title V Operating Permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to the Department of Environmental Quality, Financial Services, 700 NE Multnomah Street, Suite #600, Portland, OR 97232, within 30 days of date DEQ mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to DEQ. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee must monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and

- vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to DEQ and the EPA.
- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 does not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
 - i. Violate an applicable requirement;
 - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. Be a Title I modification.
- b. A minimum 7-day advance notification must be submitted to DEQ and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G11 does not extend to section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. Sale or exchange of the activity or facility.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from DEQ prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0205 through OAR 340-210-0250.

G21. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) from DEQ and having satisfied the requirements of OAR 340, Division 224.

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must furnish to DEQ, within a reasonable time, any information that DEQ may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to DEQ copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to DEQ along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by DEQ.
- b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and affect only those parts of the permit for which cause to reopen exists.

G25. Severability Clause [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless DEQ requests an earlier submittal. If more than 12 months is required to process a permit renewal application, DEQ must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G28. Property Rights [OAR 340-200-0020 and 340-218-0050(6)(d)]

The 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, except as provided in OAR 340-218-0110.

G29. Permit Availability [OAR 340-200-0020 and 340-218-0120(2)]

The permittee must have available at facility at all times a copy of the Oregon Title V Operating Permit and must provide a copy of the permit to DEQ or an authorized representative upon request.

All inquiries should be directed to:
DEQ Northwest Region Air Quality
700 NE Multnomah St., Suite 600
Portland, OR 97232
(503) 229-5263



State of Oregon
 Department of
 Environmental
 Quality

Department of Environmental Quality
 Northwest Region Air Quality Division

**OREGON TITLE V OPERATING PERMIT
 REVIEW REPORT**

Daimler Trucks North America, LLC
 Truck Manufacturing Plant Parts Manufacturing Plant
 6936 N. Fathom Street 5400 N. Basin Avenue
 Portland, OR 97217 Portland, OR 97217

Source Information:

SIC	3711, 3714
NAICS	336120
EPA ICIS-Air ID	

Source Categories (Part and code)	
--------------------------------------	--

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	Yes
Emission credits	
Compliance schedule	
Source test [date(s)]	

COMS	
CEMS	
PEMS	
Ambient monitoring	

Reporting Requirements

Annual report (due date)	2/15
Emission fee report (due date)	2/15
SACC (due date)	7/31
Quarterly report (due dates)	

Monthly report (due dates)	
Excess emissions report	2/15
Other reports (type)	

Air Programs

NSPS (list subparts)	JJJJ
NESHAP (list subparts)	MMMM, PPPP, ZZZZ
CAM	
Regional Haze (RH)	
Synthetic Minor (SM)	
Part 68 Risk Management	
CFC	
RACT	Yes

TACT	
Title V	Yes
ACDP (SIP)	
Major HAP source	Yes
Federal major source	
NSR	
PSD	
Acid Rain	

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LIST OF ABBREVIATIONS USED IN THIS REVIEW REPORT

AQMA	Air Quality Management Area
ASTM	American Society of Testing and Materials
BDT	bone dry ton
BWPA	Best Work Practices Agreement
CEMS	continuous emissions monitoring system
CFR	Code of Federal Regulations
CMS	continuous monitoring system
CO	carbon monoxide
COMS	continuous opacity monitoring system
DEQ	Oregon Department of Environmental Quality
dscf	dry standard cubic feet
EF	emission factor
EPA	United State Environmental Protection Agency
EU	emissions unit
FCAA	Federal Clean Air Act
gr/dscf	grains per dry standard cubic feet
HAP	hazardous air pollutant
ID	identification code
I&M	inspection and maintenance
MB	material balance
Mlb	1000 pounds
MM	million
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
PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in size
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
SO ₂	sulfur dioxide
ST	source test
VE	visible emissions
VMT	vehicle mile traveled
VOC	volatile organic compound

INTRODUCTION

1. This is a renewal of existing Title V permit 26-2197 that was issued on 7/10/2013 and originally scheduled to expire on 7/1/2018. A timely permit application was submitted to renew the existing permit so the existing Title V permit remains in force until final action is taken on the renewal application.
2. Daimler has been determined to be an existing source for the purposes of Cleaner Air Oregon in accordance with OAR 340-245-0020 because construction had commenced on this facility prior to November 16, 2018. As an existing source the permittee is required to perform a risk assessment in accordance with OAR 340-245-0050, and demonstrate compliance with the Risk Action Levels for an “Existing Source” in OAR 340-245-8010 Table 1 when called in by DEQ. Daimler has not been called in and therefore, has not performed a risk assessment.
3. 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 permit conditions.

FACILITY DESCRIPTION

4. Daimler Trucks North America, LLC. operates a heavy-duty truck manufacturing plant (TMP) located at 6936 North Fathom Street, Portland, and a parts manufacturing plant (PMP) located at 5400 North Basin Avenue, Portland. These two facilities are permitted as a single source under this permit because they are owned or operated by the same person or by persons under common control and is located on one or more contiguous or adjacent properties. The primary source of emissions at these facilities is the application of surface coatings.
5. Air contaminant emitting processes at the facility may include the following:

Emissions Unit	EU ID	Source Classification Code
All Coating Applications at TMP	1-AC	40202501
All Coating Applications at PMP	2-AC	40202510
Natural gas combustion devices	5-BO	NG use 3-09-900-03
Non-Combustion VOCs	7-VOC	30988806
Aggregate Insignificant Activities	8-AGG	30900199
RACT Coatings	1-AC & 2-AC	4-02-025-01
Emergency Generator	9-Egen	

- 5.a. 1-AC (All Coating Application at TMP) –

This emissions unit includes Volatile Organic Compound (VOC) and Particulate Matter (PM) emissions from the application of coatings at the Truck Manufacturing Plant (TMP). These coatings are applied by spray gun in paint booths to chassis, cabs, fairings and other parts and assemblies of heavy duty trucks. The emissions from these operations are subject to Reasonably Available Control Technology (RACT) requirements, which limit the daily average VOCs emitted per gallon of coating used. Because the RACT requirement does not limit the quantity of VOCs emitted by the TMP, the VOC emissions from this emissions unit are included in emissions unit 7-VOC for all VOC emitting activities except for VOCs from the combustion of natural gas,

and from those activities which are categorically insignificant. Material balance is used to calculate emissions from emissions unit 7-VOC for monitoring compliance with the Plant Site Emission Limits (PSELs) for VOC

5.b. 2-AC (All Coating Application at PMP) –

This emissions unit includes Volatile Organic Compound (VOC) and Particulate Matter (PM) emissions from the application of coatings at the Parts Manufacturing Plant (PMP). These coatings are applied by spray gun to parts and assemblies of heavy duty trucks. The emissions from these operations are subject to Reasonably Available Control Technology (RACT) requirements, which limit the daily average VOCs emitted per gallon of coating used. Because the RACT requirement does not limit the quantity of VOCs emitted by the PMP, the VOC emissions from this emissions unit are included in emissions unit 7-VOC for all VOC emitting activities except for VOCs from the combustion of natural gas, and from those activities which are categorically insignificant. Material balance is used to calculate emissions from emissions unit 7-VOC for monitoring compliance with the Plant Site Emission Limits (PSELs) for VOCs. This emissions unit also includes PM emissions resulting from spray-gun paint application in all paint booths at the facility. Particulate emissions from the paint booths are controlled by dry or wet filters located in the spray booths, and are included in the PSELs.

5.c. 5-BO (Natural Gas Combustion Devices) –

This emissions unit includes emissions from the combustion of Natural Gas in boilers, drying ovens, air make-up units, and other devices. These emissions are included in the Facility Total PSELs.

5.d. 7-VOC (Non-Combustion VOC) –

This emissions unit includes emissions of VOCs from all VOC emitting activities except for VOCs from the combustion of natural gas, and from those activities which are categorically insignificant. This includes but is not limited to solvents, coatings (including emissions unit 1-AC and 2-AC) and adhesives used in the various operations associated with truck and parts preparation, manufacturing and assembly. This emissions unit is subject to a daily emission limit based on RACT. Annual Emissions from this unit are included in the Facility Total PSELs.

5.e. 8-AGG (aggregate insignificant activities)

5.f. 9-Egen (Emergency Generator)

Kohler Model 24RCL, fueled by natural gas, rated at 28 Hp (21kW). Unit was manufactured 9/14/2017 and installed at the site in 2017. This emissions unit is categorically insignificant.

6. Daimler Trucks North America, LLC. has the following aggregate insignificant activities onsite:

- 6.a. Metal grinding
- 6.b. Fugitive dust from vehicle traffic on unpaved areas
- 6.c. Heat cleaning oven used to clean stainless steel paint filters
- 6.d. Spray paint can use

7. Some of 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 OAR Chapter 340, Divisions 200 through 268, excluding Divisions 248 and 262,

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
- Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
- 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
- Instrument calibration
- Maintenance and repair shop
- Automotive repair shops or storage garages
- 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
- Temporary construction activities
- Warehouse activities
- Air vents from air compressors
- Air purification systems
- De-mineralized water tanks
- Pre-treatment of municipal water, including use of deionized water purification systems
- Electrical charging stations
- Fire brigade training
- Instrument air dryers and distribution
- Process raw water filtration systems
- Fire suppression
- Blueprint making
- 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
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Storm water settling basins
- 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 due to circumstances beyond the reasonable control of the owner or operator, or to address a power emergency as determined by the Department
- Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems
- Non-contact steam condensate flash tanks
- Non-contact steam vents on condensate receivers, deaerators and similar equipment
- Boiler blowdown tanks
- Industrial cooling towers that do not use chromium-based water treatment chemicals
- Ash piles maintained in a wetted condition and associated handling systems and activities
- 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 228: 0210**; establishes particulate concentration emissions limits for non fuel burning equipment.
 - 8.c. Division 222: 0020**; requires Plant Site Emission Limits.
 - 8.d. Division 232: 0160; limits VOCs as pounds VOC per gallon of coating applied, excluding water and exempt solvents.
- *OAR 340-208-0110 is included because it is federally enforceable for all air contaminant sources.
- **OAR 340-228- and 340-232-0160 are included because they are federally enforceable.
9. The New Source Performance Standards (NSPS) and National Emission Standards for Hazardous Air Pollutants (NESHAP) that are applicable to this facility are included below in Paragraphs 27 and 28.
10. The following state only enforceable rule requirements have been determined to be applicable to this facility:
- 10.a. Division 208: 0300; establishes nuisance controls
 - 10.b. Division 208: 0450; establishes a particulate size limitation
11. 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 that trigger CAM applicability.

CHANGES TO THE PERMIT

12. The permit condition language has been revised in some conditions based on updates to rules since the prior permit renewal. These changes bring the permit up to date with current rules.
13. Conditions have been added to the permit to implement the Best Work Practices Agreement relating to nuisance odors from the facility after a DEQ determination of suspected nuisance. Changes include a reduction in the VOC PSEL and Netting Basis to reflect moving the majority of cab painting off-site and

out of Oregon to other facilities owned by the permittee. The PSEL is being reduced from 470 tons per year to 86 tons per year, effective January 1, 2023, in compliance with the Best Work Practices Agreement to address nuisance conditions. This is treated as a rule require reduction under OAR 340-208-0320 Nuisance Control Requirements: Best Work Practices Agreement so the netting basis is also being reduced to 86 tons per year with the same effective date.

- 14. Thee notices of approval were submitted during the last permit cycle: NOA 30581 for replacing two dust collectors in 2019; NOA 29527 for expanding chassis booth in 2018 and NOA 29143 for replacing the emergency generator in 2017.
- 15. Other conditions of the Best Work Practices Agreement that are effective until the VOC PSEL is decreased and are implemented through permit conditions. These include:
 - 15.a. Studying the feasibility of using factory premix pain from an offsite supplier by February 20, 2021
 - 15.b. Continue to use only high-solids pre-mixed coating where Daimler has already initiated use
 - 15.c. Study the use of high-solids clear coat
 - 15.d. Submit a plan to study the feasibility of conversion to high-solids clear coat, submit a report to DEQ on the findings of the feasibility study and implement where feasible

PLANT SITE EMISSION LIMIT

- 16. The TMP and PMP facilities were both in operation in and before 1978 and therefore both have Baseline Emission Rates (BER). The separate BERs for the facilities have been summed together to determine a single BER for this (combined) source. The (combined) source is also subject to a single Plant Site Emission Limit (PSEL) for each pollutant. The BERs and PSELs are detailed in the tables below.
- 17. The normal operating schedule for the plant is different from the baseline year and is 24 hours/day x 5 days/week x 50 weeks/year = 6000 hours/yr.
- 18. The PSELs in this permit renewal for the period before January 1, 2023 are shown in the table below. All PSELs remain the same as in the prior permit.

Pollutant	Netting Basis	PSEL		Difference from Netting Basis and PSEL		Unassigned emissions	SER
		Previous	Proposed	Previous	Proposed		
*PM/PM ₁₀	29	24	*24	[5]	[5]	5	25/15
**PM _{2.5}	NA	24	24	[5]	[5]	5	10
SO ₂	4	39	39	+35	+35	0	40
NO _x	33	39	39	+6	+6	0	40
CO	14	99	99	+85	+85	0	100
VOC	444	470	470	+26	+26	0	40
***GHG	NA	74,000	74,000	NA	74,000	0	75,000

Note: Calculations for the PSEL numbers are provided in the prior permit review report and are not being revisited here.

Decreases in brackets

*Since the actual amount of PM₁₀ emissions is unknown, the PM Generic PSEL level of 24 tons/12 months is being set as the facility’s total particulate matter PSEL for the facility, which includes both PM₁₀ and PM.

**All PM in the Netting Basis and PSEL are assumed to be PM_{2.5}. This assumption may be revisited in the next permit renewal.

*** The Greenhouse gas PSEL is set at the Generic level of 74,000 tons/yr CO_{2e} because Daimler emits GHG over the DEQ deminimis rate of 2,756 tons/yr. Daimler’s actual GHG emission for 2011 were around 3,100 tons/yr CO_{2e}.

BEST WORK PRACTICES AGREEMENT

19. The PSELs in this permit renewal for January 1, 2023 and beyond are shown in the table below. All PSELs except for VOC remain the same as in the prior permit.

Pollutant	Netting Basis	PSEL		Difference from Netting Basis and PSEL		Unassigned emissions	SER
		Previous	Proposed	Previous	Proposed		
*PM/PM ₁₀	29	24	*24	[5]	[5]	5	25/15
**PM _{2.5}	NA	24	24	[5]	[5]	5	10
SO ₂	4	39	39	+35	+35	0	40
NO _x	33	39	39	+6	+6	0	40
CO	14	99	99	+85	+85	0	100
VOC***	86	470	86	0	0	0	40
***GHG	NA	74,000	74,000	NA	74,000	0	75,000

Note: Calculations for the PSEL numbers are provided in the prior permit review report and except for the VOC numbers are not being revisited here.

Decreases in brackets

*Since the actual amount of PM₁₀ emissions is unknown, the PM Generic PSEL level of 24 tons/12 months is being set as the facility's total particulate matter PSEL for the facility, which includes both PM₁₀ and PM.

**All PM in the Netting Basis and PSEL are assumed to be PM_{2.5}. This assumption may be revisited in the next permit renewal.

***The VOC Netting Basis and PSEL are being reduced from 444 and 470 respectively to 86 tons/year in compliance with the Best Work Practices Agreement and OAR 340-208-320. This change is being made as a rule required reduction to comply with the nuisance rules.

**** The Greenhouse gas PSEL is set at the Generic level of 74,000 tons/yr CO₂e because Daimler emits GHG over the DEQ deminimis rate of 2,756 tons/yr. Daimler's actual GHG emission for 2011 were around 3,100 tons/yr CO₂e.

20. The permit includes negotiated requirements established under a Best Work Practices Agreement between DEQ and the permittee. These practices are included in an effort to reduce odor impacts on residents near the facility.

FACILITY WIDE COMPLIANCE MONITORING REQUIREMENTS

21. 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 DEQ annually, along with the annual report.

COMPLIANCE MONITORING FOR THE PSELS

22. The Plant Site Emission Limits regulate VOC emissions from emission unit VOC-A and includes PM, PM₁₀ and PM_{2.5} 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. The emissions from aggregate insignificant activities are included in the Plant Site Emission Limits at the aggregate insignificant emissions limit of 1.0 ton per year.

HAZARDOUS AIR POLLUTANT EMISSIONS

23. The Potential to Emit Hazardous Air Pollutants (HAPs) for Calendar Year 2011 and beyond is:

CAS Number	Pollutant	Emission in Tons
100414	Ethyl Benzene	0.43
108101	Methyl Isobutyl Ketone (MIBK)	0.01
67561	Methanol	2.31
108883	Toluene	0.56
1330207	Xylene	6.06
NA	Chromium Compounds	2.50
Total HAPs:		11.87

ADDITIONAL REQUIREMENTS

- 24. The source is required to submit reports to DEQ 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 subject to federal regulations for National Emissions Standards for Hazardous Air Pollutants (NESHAPs) for surface coating of miscellaneous metal parts and products, 40 CFR PART 63 Subpart Mmmm, and 40 CFR Part 63 Subpart Pppp for surface coating of plastic parts and products. Both NESHAP MACT standards were promulgated in 2004. As outlined in the definition of military munitions under 40 CFR 260.10, the facility does not qualify for any exemption under 40 CFR 63.3881(c)(4) or 40 CFR 63.4480(c)(3).
- 28. The NESHAP Subpart Mmmm applies to each new or existing affected source at that uses 946 liters (250 gallons) per year, or more, of coatings that contain hazardous air pollutants (HAP) in the surface coating of miscellaneous metal parts and products and that is a major source of emissions of HAP. [40 CFR 63.3881(b)]
 - 28.a. The facility is a major source of HAP emissions. Miscellaneous metal parts and products include, but are not limited to, metal components of the following types of products as well as the products themselves: motor vehicle parts and accessories, bicycles and sporting goods, recreational vehicles, extruded aluminum structural components, railroad cars, heavy duty trucks, medical equipment, lawn and garden equipment, electronic equipment, magnet wire, steel drums, industrial machinery, metal pipes, and number other industrial, household, and consumer products. [40 CFR 63.3881(a)]
 - 28.b. The permittee performs general use coating operations.
 - 28.c. The affected source consists of all coating operations as defined in 40 CFR 63.3981; all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners, and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation. [40 CFR 63.3882(b)(1-4)]
 - 28.d. For the purposes of the NESHAP, an existing affected source is any affected source that is not a new or reconstructed source. [40 CFR 63.3882(e)]

29. The NESHAP for Subpart PPPP applies to each new or existing affected source that uses 378 liters (100 gallons (gal) per year, or more of coatings that contain hazardous air pollutants (HAP) in the surface coating of plastic parts and products and that are a major source of emissions of HAP. [40 CFR 63.4481(b)]
- 29.a. The facility is a major source of HAP emissions. Plastic parts and products include, but are not limited to, plastic components of the following types of products as well as the products themselves: motor vehicle parts and accessories for automobiles, trucks, recreational vehicles; and sporting and recreational goods. [40 CFR 63.4481(a)]
- 29.b. The permittee's performs general use coating operations.
- 29.c. The affected source consists of all coating operations as defined in 40 CFR 63.4581; all storage containers and mixing vessels in which coatings, thinners and/or other additives, and cleaning materials are stored or mixed; all manual and automated equipment and containers used for conveying coatings, thinners, and/or other additives, and cleaning materials; and all storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation. [40 CFR 63.4482(b)(1-4)]
- 29.d. For the purposes of the NESHAP, an existing affected source is any affected source that is not a new affected source. [40 CFR 63.4482(e)]
30. The alternative NESHAP (subparts MMMM and PPPP) compliance method allowed in the permit assumes that any coating that is used on both metal and plastic parts is all used on metal, and all used on plastic, parts; and that coatings must comply with both Subparts. Since the facility uses the same coating on both substrate types, this compliance method will be at least as stringent as separating the coatings and determining compliance strictly on what is applied to each substrate. Any coating that is used exclusively on one substrate will not be included in the compliance calculations for the other substrate. Note: for at least the last few years, Daimler has been using coatings that have a HAP content less than 10% of the applicable NESHAP limits (less than 5% in 2012), which adds further confidence that the limits will not be exceeded using this alternative calculation method.

CLEANER AIR OREGON

31. The Cleaner Air Oregon Toxic Air Contaminant emissions inventory for this source can be found on this website: https://www.deq.state.or.us/AQPermitsonline/26-2197-TV-01_ATEI_2016.PDF

GENERAL BACKGROUND INFORMATION

32. A Land Use Compatibility Statement was signed by the City of Portland on 07/22/1993.
33. The permittee was last inspected on 08/25/2014, 07/26/2016 and 07/24/2018, and was found to be in compliance with all permit conditions.
34. Numerous odor complaints pointed at this source have been received by DEQ. All of these complaints have been referred to Daimler for logging and follow-up. Daimler is investigating the possible sources of these odors, and if they are associated with the Daimler process, what they are able to do to minimize them. The permit renewal includes the requirements for a negotiated Best Work Practices Agreement between DEQ and the permittee to help mitigate odor impacts.
35. The permit is a renewal Oregon Title V Operating Permit.

PUBLIC NOTICE

36. This permit was on public notice from 10/29/2020 to 12/14/2020, and a public hearing was held on 11/30/2020. After the comment period and hearing DEQ wrote responses for all comments received. A proposed permit, along with the response comments, was sent to EPA for a 45 day review period.
37. Any person may petition the EPA to object to the permit within 60 days after the expiration of EPA's 45-day review period. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.
38. DEQ received comments on the draft permit renewal from 10 individuals and one organization. The comments are summarized below and a list of commenters is included after the comments and DEQ responses. Due to comments submitted, rule references previously omitted were added to the Title V permit. The proposed Title V permit for Daimler Trucks NA was sent to EPA for 45-day review on 03/25/2021.
39. No comments from the EPA were received during 45 day review period. The Title V permit for Daimler Trucks NA located at 6936 N Fathom Street in Portland is issued as proposed.



State of Oregon Department of Environmental Quality

Hearing Officer's Report and Response to Comments

Date: March 24, 2021

Hearing Officer: Steve A. Dietrich

Company Name: Daimler Trucks North America, LLC

Permit No.: 26-2197-TV-01

Application No.: 29136

Background

Daimler Trucks, NA operates a heavy duty truck manufacturing plant at 6939 N. Fathom Avenue in Portland, Oregon. The permit also includes the Daimler Parts Manufacturing Plant at 5400 N. Basin Avenue. The facility operates under a Title V permit that was scheduled to expire on July 1, 2018. Daimler submitted an application to renew their Title V permit on July 3, 2017, 12 months prior to the scheduled expiration date. The existing permit remains in force until final action is taken on the renewal application because the renewal application was submitted timely.

This report and Response to Comments provides DEQ's responses to the public comments submitted during the comment period and public hearing.

The Daimler Title V permit was placed on public comment from October 29, 2020 until December 14, 2020. A public hearing was scheduled and held on November 30, 2020.

Public comment

DEQ received comments on the draft permit renewal from 10 individuals and one organization. The comments are summarized below and a list of commenters is included after the comments and DEQ responses.

A. Decades of odors/complaints.

1. *It's difficult to grasp that this issue with which these neighbors have been grappling with for decades still has not been resolved. DEQ needs to step up to the plate and demand that this public nuisance issue gets resolved NOW!... Why allow this company to stall and play games while the neighbors have to endure years of frustration?*
2. *It feels like our neighborhood has been working for YEARS on finding a solution with Daimler. Every fall I am reminded by this smell that we have not succeeded in a resolution. And every fall when I am on walks in the neighborhood and smell this paint odor, I call in air quality complaints to DEQ.*
3. *DEQ's determination that Daimler is the source of a suspected public nuisance in 2018 came on the heels of more than twenty years of advocacy by University Park neighbors regarding VOC emissions and odors in the neighborhood. Understandably, community members are fatigued by years and years of constantly reporting the issue. Public confidence in DEQ's actions – and particularly the Agency's handling of nuisance pollution – is low.*
4. *...and it does not bother them to be labeled a "Nuisance" I believe they laugh at that term, and they also laugh at the half-hearted attempts by the DEQ to regulate them. Is the DEQ willing to fine them or shut them down for Nuisance odor infractions?*
5. *...yet my neighborhood has been dealing with these odors for over 20 years. I have been in the neighborhood for just over 12 years and am tired of smelling paint on a daily basis from October to June. The nuisance has been going on for much longer than the 9 years that I have been involved in trying to make changes to better my neighborhood's livability. The community is fatigued by having to send in odor reports. Many are not even reporting odors anymore due to the time it takes to submit SO many complaints over and over and over again for years and years and feeling like it does nothing to decrease odors. How will Daimler make this easier and less burdensome to report odors in the future and how will DEQ enforce this?*
6. *And it's not an overstatement that she (Stacey) was choking on the fumes this morning, and that is such a common experience for me and our family walking in this neighborhood. And if it was worse 10 years ago, I can't even imagine; we've only been here 10 years.*

DEQ Response:

Daimler has been declared a "suspected nuisance"

[<https://www.oregon.gov/deq/FilterDocs/daimlerSusNuiLetter081518.pdf> August 15, 2018] and has entered into a Best Work Practices Agreement (BWPA) [Order No. AQ/V-NWR-2019-109], with elements from this agreement incorporated into this Title V Permit renewal, namely conditions 25 through 28, which focus on reductions of volatile organic compounds (VOCs). Based on the best available evidence, DEQ has concluded that VOCs, mostly from surface-coating operations, are the primary source odors caused by the facility.

Beginning in January 2018, Daimler implemented the use of Hazardous Air Pollutant-free touch up paint and the replacement of conventional paint guns with reduced pressure (RP) paint guns for topcoat painting in an effort to reduce the potential for odors. In addition, Daimler has committed to relocating a majority of its truck cab painting to a facility outside of Oregon. Understanding that the primary source of emissions at the plant is from the application of surface coatings, and with a majority of this operation being phased out over the next two years, it is anticipated that odorous emissions will also be reduced.

DEQ's own Nuisance Odor Report indicates that the agency can and may "specify that higher and more intensive odor control measures are required if the initial measures do not sufficiently abate the odor." [<https://www.oregon.gov/deq/FilterDocs/NuisanceOdorReport.pdf>] DEQ expects that this BWPA and resulting permit conditions will result in real change and improvement in air quality. Paragraph 9 of the BWPA indicates that DEQ "will continue to consult with complainants with standing in this matter throughout the development, preparation, implementation, modification and evaluation of this BWPA.". DEQ intends for the BWPA to mitigate the nuisance and to be a living document, with opportunities for modification to achieve its intended purpose.

Paragraph 10 of the BWPA indicates "Pursuant to OAR 340-208-0320(1), this BWPA is an Order requiring Daimler to mitigate odors..."

DEQ expects that real and persistent changes will be implemented to mitigate odors.

In addition, permit condition 6 states “The permittee must not allow the emission of odorous matter in such a manner as to cause a public nuisance in accordance with OAR 340-208-0300. This condition is only enforceable by the State.” In the past, DEQ has not done a thorough job enforcing this condition, and with this permit renewal and BWPA, DEQ commits to doing a better job enforcing this condition and the underlying regulation (OAR 340-208-0300).

DEQ understands the frustration that many complainants have experienced and expressed with continual complaints being lodged with no apparent relief. DEQ will continue to work with Daimler to address these complaints, and we expect that the steps and requirements listed in the BWPA are a significant milestone for real and significant reductions in odors and VOC emissions. Daimler has also recently implemented a direct telephone hotline for community members so complaints can be investigated and addressed more quickly/closer to real time. Daimler will submit a record of the complaints they receive directly to DEQ. Information about the hotline is available on the DEQ Daimler facility web page: <http://ordeq.org/daimler>.

B. VOC Reductions driven by Daimler’s plans, not DEQ’s requirement

- 1. No actual reductions are mandated for two or more years, and the community has been waiting for decades. This timeline appears to be fully driven by Daimler’s pre-existing plans to change plant operations, rather than the Agency mandating changes to reduce nuisance odors.*
- 2. There is no change to Daimler’s permitted emissions of VOCs until 2023...this timeline appears to be determined entirely by Daimler’s planned change in operations onsite, and is not determined at all by what is needed to prevent nuisance odors. DEQ should explain why Daimler’s plans appear to drive this timeline...*
- 3. The timeline is WAY too long and seems only to be driven by Daimler’s already planned manufacturing changes to make the current plant an electric truck plant. No actual VOC reductions will even be made for over 2 years.*

DEQ response: The proposed Title V permit condition 25 implements a lower VOC Plant Site Emission Limit (PSEL) beginning on and after Jan. 1, 2023; from a currently allowable 470 tons per year (i.e. rolling 12-month period) to 86 tons per year.

Since Daimler is an existing and operating facility, it takes time to retrofit and modify operations while the plant continues to operate. DEQ will hold Daimler to their agreed upon timeline.

As of issuance of this permit, Daimler has already replaced their conventional paint guns with reduced pressure paint guns, which decreases by 50% coating overspray and VOC emissions on a pounds per truck basis. These paint guns improve transfer efficiency, thereby reducing the amount of coating per truck, and minimization of overspray.

C. OAR 340-208-550 requires highest and best control equipment for odor bearing gases

- 1. Ideally Daimler should be required to install a thermal oxidizer or some other filtration system on the remaining paint booth exhaust system prior to venting the paint fumes into our neighborhood air. I am assuming they are making this improvement (major renovations to the assembly plant) so as to capture the VOCs from the chassis paint, lubricants, and solvents rather than just letting them just dissipate into the air inside and outside the plant where they are an irritant to both workers and visitors. My concern is if the new ventilation system is efficient at capturing the VOCs, where will they be venting them? Up a tall stack and into our neighborhood or will they be filtering the VOCs out prior to exhausting them into the ambient air?*
- 2. OAR 340-208-0550 requires a facility to install and operate control equipment or apparatus to reduce emissions of odor-bearing gases and particulate matter using the “best and highest practicable treatment currently available.” ...Given that DEQ has determined Daimler to be a suspected public nuisance, a common sense approach would indicate that if any facility is subject to this requirement, it*

is one that is a public nuisance due to odors affecting neighboring communities....it is hard to imagine what justification DEQ has for not applying this regulation to Daimler.

3. *How does DEQ plan to enforce this for Daimler? What about continued painting? Since Daimler was declared a public nuisance there should be no question that they should be required to implement these strategies. How will DEQ uphold this OAR?.*

DEQ response: In the proposed Title V Permit renewal, the list of Non-Applicable requirements are found in proposed condition 111, and include OAR 340-208-0570, as Daimler does not operate ship traffic in these four counties at this facility. This is explained with reason codes “c” or “e”; either “the facility is not in a special control/non-attainment area” or “the facility does not have this emissions unit”. Permit conditions 25 through 28 have been amended to include the rule reference for OAR 340-208-0550, as these conditions, from the BWPA, are considered highest and best practicable treatment currently available to reduce to a minimum odor-bearing gases emitted into the atmosphere.

We regret the omission of this rule reference, and have corrected this error.

D. Verify the VOC reduction from 470 tons to 86 tons. Also, actual 2019 VOC emissions were 92.7 tons, so not an actual reduction.

1. *Who will be checking this? How often will this be verified.*
2. *...so required reductions in VOC emissions by 2023 are not as extreme as they appear (i.e. actual vs. PSEL) How will actual reductions in VOC emissions be monitored?*
3. *Why is there no monitoring and tracking of emissions of air contaminants in the BWPA? For the year 2019 actual emissions were 86.5 tons/year for coating operations and total VOC emissions 92.7 tons/year. So to make a big deal about potential emissions going down from 470 to 86 really isn't that much of an actual reduction.*

DEQ response: The proposed Title V permit conditions 24 and 25 limit the emissions of VOC to 470 tons per year (rolling 12-month), then beginning on Jan. 1, 2023, VOCs are limited to 86 tons per year. Additionally, permit conditions 60, 61, 68 and 70 incorporate monitoring and reporting requirements.

VOC emissions from Emission Unit 7-VOC (Non-Combustion VOCs) are required to be calculated monthly in accordance with very specific requirements found in proposed permit condition 70.c., which include tracking the monthly quantity of VOC containing coatings purchased (in gallons), the VOC content of each coating (pounds per gallon), and the monthly VOC content of waste shipped offsite for recycling.

These conditions and the records for these requirements are reviewed during semi-annual and annual reporting, as well as during announced and unannounced facility inspections..

E. In 2023, surface coating VOC emission to be limited to 39 tons/yr; with a VOC PSEL of 86. The remaining 47 tons – how controlled?

1. *However, this limitation in VOC emissions only applies to surface coating operations, which leaves an allowance of 47 tons of VOC emissions per year outside of surface coating. ...what is the purpose of an 86 ton/yr PSEL if surface coating VOC emissions must be reduced to 39 tons/yr? Concern over paint application to miscellaneous parts and “legacy” truck fab and repair and allowable 47 tons of VOC emissions for this activity, which could greatly increase. ...so required reductions in VOC emissions by 2023 are not as extreme as they appear (i.e. actual vs. PSEL) How will actual reductions in VOC emissions be monitored?*
2. *In 2023 the BWPA states emissions will go down to 39 tons VOC/year, but only for surface coatings. Daimler will still be doing other painting. Why is this not being included in these numbers? Non surface coating painting could still be a nuisance...it seems very likely that it will not decrease the odors that we smell in the neighborhood.*

DEQ response: The predominant painting that takes place at the facility is surface coating of truck chassis or cabs. VOC emissions from these operations will be limited to 39 tons per year, with much of this activity being moved off-site to locations outside of Oregon within two years. The remaining painting activities (touch-up of previously coated components, adhesive usage, cleaning solvent usage and paint application to miscellaneous parts) will most likely not result in significant VOC emissions.

Daimler has already implemented the use of premixed white coating (HSB905935A), which has resulted in VOC reductions from the "mix room" for formulating this color. EPA specifically called out mix room emissions in its May 2017 comments on Daimler's cost-effectiveness analysis as an area to target in reducing solvent emissions. High solids content coatings (having higher percentage paint solids and a lower percentage of solvent carrier) have less solvent and require fewer applications to obtain the required film thickness, both resulting in lower VOC emissions. This work practice on the white top coat has been implemented, with the study on high solids pre-mix coatings for the rest of the coating inventory provided to DEQ on February 22, 2021, as discussed below in answer to item 6.

F. BWPA 180 day requirements

1. *BWPA requires Daimler to explore and compare the feasibility of converting to high solid clear coat paint, versus the conversion to using factory premix paint from an offsite supplier. Will electrostatic coating be considered as well? What is the anticipated reduction in emissions for using factory premix paint? Anticipated reductions from conversion to high solids clear coat? What reductions from undertaking electrostatic coating?*

DEQ response: Daimler was required in the BWPA to submit by February 20, 2021 a standard practice procedure for the use of factory premix paint from an offsite supplier. DEQ received this document on Monday, February 22, 2021, and this document will be made available to the public.

Daimler submitted a plan to study the feasibility for use of high-solids clear coatings on December 18, 2020. DEQ is currently reviewing the study plan. Once DEQ approves the study plan, Daimler has 180 days to complete the feasibility study. Within 210 days of completing the feasibility study, Daimler will begin to implement the use of high-solids clear coatings where feasible.

By August 19, 2021, Daimler will submit an evaluation report for the use of electrostatic coating technology. This document will also be made available to the public. Anticipated reductions from the above items will be shown in the resulting reports, but will certainly not exceed the lowered VOC PSEL.

G. Bluff air monitoring

1. *DEQ to allow an independent air monitoring station or some other mechanism for examining the whole dynamics of the harbor, which with the bluff, is very different from the larger Portland air shed.*
2. *...suggest that they (Daimler and/or DEQ) approach [Nancy Heiser] as she has access to very high-quality air monitoring equipment for the bluff, and consider partnering with the University of Portland.*

DEQ response: DEQ would be willing to partner with independent agencies to monitor air quality on the bluff in a review capacity to examine the type of equipment used, what pollutants are to be measured, the procedures for the monitoring equipment, and the resulting data produced.

H. BWPA is not sufficient to abate the public nuisance presented by Daimler

1. *DEQ to allow an independent air monitoring station or some other mechanism for examining the whole dynamics of the harbor, which with the bluff, is very different from the larger Portland air shed.*
2. *As it stands, it is unclear how exactly this BWPA will result in abatement of the nuisance the community currently experiences due to Daimler's operations.*
3. *...the BWPA agreement does not even address the nuisance or abatement. What if the BWPA does not achieve the desired result and we still have paint odors after January 2023?*

DEQ Response: The BWPA is a first step in reducing the odorous VOC emissions. The BWPA implements specific work practices that are intended to reduce VOC emissions and odors. The BWPA specifically states that "Pursuant to OAR 340-208-0320(5), DEQ has consulted and will continue to consult with complainants with standing in this matter throughout the development, preparation, implementation, modification, and evaluation of this BWPA ." [Paragraph 9 of Order No. AQ/V-NWR-2019-109, Best Work Practices Agreement]. If the BWPA does not achieve the desired result, it can be modified.

DEQ plans to set up periodic community meetings (with or without Daimler present) to discuss the status of the BWPA effectiveness, and the outstanding items in the BWPA, including the feasibility studies due (10.C.(1), 10.C.(3), 10.D.) to DEQ

I. Daimler feasibility study

1. *Why Daimler is apparently allowed to conduct its own feasibility study is mind-boggling as well.*
2. *DEQ needs to be clearer about what kind of metrics will be used to determine whether certain actions are "feasible". Need independent verification. Daimler has been known to inflate costs of remediation of the nuisance odors in the past.*
3. *Another concern regarding the BWPA's reliance on Daimler's self-conducted feasibility studies is the lack of independent verification. Independent evaluation of feasibility claims and studies is critical. If the Agency is unable or unwilling to obtain independent evaluation of Daimler's feasibility studies and potential operations improvements, it is critical that at minimum feasibility studies be released publicly so that community members and public advocates can see how decisions are being made. Is DEQ open to some residents participating in discussions about the feasibility assessments prior to the Agency commenting on Daimler's conclusions regarding conversion to high solids clearcoat and electrostatic coating?*
4. *DEQ DEQ MUST require Daimler to engage a third party oversight to determine what is feasible. There is no independent oversight or verification of what is feasible and Daimler does not have a stellar record of being forthcoming with that information and when it was presented, it was quite inflated as far as costs to install control technology. What methods will be used to determine whether certain actions are feasible?*

DEQ Response: It is common for industry to hire a consultant to conduct feasibility studies for a variety of environmental work. Daimler hired Trinity Consultants in 2017 [*Daimler Trucks North America Technical Evaluation of Add-on VOC Control Devices Portland, Oregon Facility*, Trinity Consultants February 2017 Project 163401.0143] to conduct a review of facility operations and opportunities for VOC reductions, including the cost of potential reductions. As stated in the Executive Summary "On November 17, 2016, DEQ requested that Daimler reassess volatile organic compound (VOC) control options for all painting processes based on current operations at its Swan Island truck plant. The DEQ letter suggested that the 2012 VOC Control Technologies Study 'did not adequately evaluate the actual operations at the facility, and appears to overestimate costs.' DEQ requested a 'detailed analysis using actual site operations, timing, frequency, flowrates, VOC concentrations, etc.' As a result of the DEQ letter, Daimler engaged Trinity Consultants to perform an additional assessment of its VOC emissions at the site and estimate the cost of control on a dollars per ton VOC eliminated basis. The results of our analysis are contained in this report."

However, DEQ has consulted with EPA Region 10 to review this Trinity report and will consider utilizing future independent reviews of feasibility studies and proposals.

EPA's review documents are available on the DEQ's Daimler project page:

J. DEQ should require community engagement in the implementation of the BWPA

1. *DEQ should require community engagement in the implementation of the BWPA as required by OAR 208-0320(5) [sic] {OAR 340-208-0320(5)}, with the Agency if not directly with the polluter. Is DEQ open to some residents participating in discussions prior to the feasibility assessments being commented on by DEQ? .*
2. *...it seem illogical for DEQ to avoid including any monitoring or community engagement in this BWPA, if not some other verification strategy...Complainants generally do not feel that DEQ has helped them with the resources to fully comprehend the proposed best work practices and how they will improve the situation. When explicitly asked why this strategy was employed, DEQ's representative at the public hearing stated "Daimler preferred to have a smaller engagement opportunity" at the initial meeting regarding the BWPA. It is unclear why DEQ is catering to what the polluter prefers in this instance without pushing back, despite the requirements of OAR {340} 208-0320(5). Because to date there has not been meaningful consultation with complainants, it is all the more critical that DEQ institute meaningful community engagement moving forward. Currently, there is no way in the BWPA for the community to engage in regards to implementation, modification and evaluation of the BWPA and in regards to odors. How can these be added so that they are requirements of Daimler?*

DEQ Response: DEQ is committed to community engagement in evaluating the progress of the BWPA commitments and their success in reducing VOC emissions and odors. As stated earlier in this document, specifically in the response to items 1 and 8, the BWPA is a living document, with opportunities to modify and evaluate the progress. DEQ plans to schedule routine progress update meetings with the community to discuss the success of the BWPA in reaching its intended goals.

K. No respect or trust for Daimler due to past non-action, no direct communication or renegeing on promises

1. *Daimler has also in the past promised some remediation to our neighborhood such as air monitoring equipment...then backed out of that promise after the permit was approved. This does not inspire respect or trust of the company by the neighborhood. Daimler has the money and technology to make sure the air we breath is safe! We are simply asking that they stop trespassing on our property with their pollution! That would be showing the best respect to our neighborhood!*
2. *Daimler is German, which has strict environmental policies. It's not a lack of technology or knowledge about how to keep the air clean...It's simply to me a lack of goodwill...The fact that they could not step up really shows the lack of community participation and citizenship in my mind.*
3. *Still without direct conversation with Daimler I am not sure of soundness of my conjecture and assumptions. ...but Daimler needs to go back and present their plans to the neighborhood...we just want to be able to ask Daimler questions and get clarifications...It is Daimler's job to present their plans for removing or limiting paint odors from our neighborhood... I respectfully do not support renewing Daimler's permit until they meet with the neighborhood, as the plant manager Paul Erdy did back in 2012.*
4. *Daimler is a "bad neighbor" and it has always been one...They will do nothing voluntarily...But they are unwilling to spend anything to clean up our air.*
5. *...and Daimler even declined to allow the community to watch a recorded version of the presentation of the BWPA after it was already developed AND SIGNED. It is beyond frustrating to not have any community support or be allowed access to advocates who might offer technical expertise to help me fully understand the BWPA.*
6. *There seems to have been a lack of goodwill on the part of the Daimler Company.*

DEQ Response: DEQ acknowledges the community's frustration with the pace of progress in reducing VOC emissions and odors over many years. As stated above, DEQ and Daimler have developed a Best Work Practices Agreement as a first step in reducing the odorous VOC emissions. If the BWPA does not achieve the desired result, it can be modified. DEQ plans to schedule routine progress update meetings with the community to discuss the success of the BWPA in reaching its intended goals

L. Vigor Industries provides a good example of work with neighborhood; why can't Daimler be an equally good industrial neighbor?

1. *And with the work we (NPAQ) did with Vigor Industries on a good neighbor agreement, it was such a contrast trying to work with Daimler...they wouldn't budge to do more than what was required...And I really think that since Vigor has provided this blueprint for all the people on Swan Island...that Daimler has always been the biggest offender.*
2. *The other Title V permittee on Swan Island does this consultation (consult with Dr. Steve Kolmes at UP to identify weather windows that would keep the isocyanate based paint fumes from entering our neighborhood), voluntarily with UP prior to painting.*
3. *Daimler can look to their neighbors, Vigor, and see that they voluntarily hired an independent third party to evaluate what changes could be made and the cost. I want to see that happen for Daimler as well.*

DEQ Response: Daimler did hire a third party (Trinity Consultants) to conduct an evaluation of Add-on VOC Control Devices at the Portland Facility. EPA Region 10 independently reviewed this study, as discussed in the response to comment I, above.

The Vigor Good Neighbor Agreement (GNA) is another example of community engagement, and included the following elements in its Terms of Agreement:

1. Meteorological Monitoring
2. Emission Reduction Commitments
3. Neighborhood Advisory Committee

DEQ is willing to engage in Meteorological Monitoring in a review capacity; see response to Comment G, above.

This Title V Permit renewal includes Emission Reduction Commitments by Daimler; see response to Comments D and E, above.

DEQ is supportive of the formation of a formal Neighborhood Advisory Committee, but cannot compel Daimler to participate. We will however, ensure that:

- all required feasibility studies will be made public,
- the BWPA can and will be evaluated and modified if necessary to ensure compliance and that it's meeting its intended purpose, and
- Daimler will implement a direct telephone hotline to receive complaints (see response to Question/Comment A).

M. BWPA language only on odors; what about chemicals that are odorless and still dangerous?

DEQ Response: Cleaner Air Oregon is DEQ's new health risk-based air toxics industrial permitting program, requiring sources to evaluate their emissions of 633 air toxics. Daimler is considered an "existing facility" and had submitted an air toxics emission inventory in 2016, which is available to the public on our CAO website: <https://www.oregon.gov/deq/aq/cao/Pages/default.aspx>, the right column "For Facilities" in the "Emissions Inventory" link. This will download access to an Excel Spreadsheet, which can be sorted by source number. Daimler's permit no. (and source number is 26-2197).

Daimler is listed in Group 3 (existing source) and is anticipated to be “called in” to conduct its risk assessment in 2023, although the exact timeline is dependent on new sources (called in upon application submittal) and Groups 1 & 2 existing source timelines.

N. PSEs are legally deficient

1. *The commenters believe that the PSEL program does not meet the minimum requirements of the Clean Air Act and is therefore illegal.*

DEQ Response: The Oregon Plant Site Emission Limit program is part of a program that EPA has approved and determined to be equivalent to the Federal program.

Commenters

Identifier	Name	Contact info (if given)
A	Ineke Deruyter	ideruyter@hotmail.com 9322 N Oswego Ave., Portland, OR 972023 [sic] {97203}
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C	Lisa Manning	Pokman3@earthlink.net 7063 N. Wellesley Ave., Portland, OR 97203
D	Stephanie McBride	Verbal testimony at Public Hearing (11/30/2020)
E	Penny K. Meiners	Endlesssummer02@gmail.com , 503-803-8151 4723 N. Willamette Blvd., Portland, OR 97203
F	NEDC/NCA	Tori Heroux, NCA Jonah Sandford, NEDC
G	Dennis Poklikuha	Verbal testimony at Public Hearing (11/30/2020) and written comment 7063 N. Wellesley Ave., Portland, OR 97203
H	Stacey Schroeder-Moultrie	Verbal testimony at Public Hearing (11/30/2020) and written comment Stacey.schroeder.moultrie@gmail.com
I	Jeremy Spurgeon	Verbal testimony at Public Hearing (11/30/2020)
J	Thomas (last name indistinguishable)	Verbal testimony at Public Hearing (11/30/2020)
K	Barbara Quinn	Verbal testimony at Public Hearing (11/30/2020)

List of Groups/Associations of which many commenters were/are members:

- Neighbors for Clean Air (NCA)
- Northwest Environmental Defense Center (NEDC)
- North Portland Air Quality Group (NPAQG or NPAQ)

Conclusion

DEQ has modified the permit to include the County-specific rule citation OAR 340-208- that was left out of the permit. Additional changes have not been made from the draft to the proposed Title V permit.

