

# LRAPA Requests Comments on the Proposed Air Quality Permit Modification for McFarland Cascade Pole and Lumber Company

HOW TO PROVIDE PUBLIC COMMENT				
Facility name: McFarland Cascade Pole and Lumber Company	Submit written comments: By mail: Lane Regional Air Protection Agency			
Permit number: 205108 Permit type: Standard Air Contaminant Discharge Permit	1010 Main Street Springfield, OR 97477			
Comments due by: December 5, 2023 5 p.m.	By email: permitting@lrapa.org			

The Lane Regional Air Protection Agency invites the public to submit written comments on the modification of the air quality permit, known officially as a Standard Air Contaminant Discharge Permit (ACDP), for McFarland Cascade Pole and Lumber Company. ("McFarland" or "facility").

## Summary

McFarland submitted an air permit application on August 15, 2023, to modify their existing air quality permit to install a new natural gas-fired boiler with a maximum heat input rate of 16.28 MMBtu per hour. The new boiler will be the primary boiler for the facility and the existing 14.7 MMBtu per hour boiler will become a backup boiler. In addition, the facility requested the existing 14.7 MMBtu per hour boiler be reclassed under 40 CFR 63 subpart JJJJJJ (6J) as meeting the definition of a gas-fired boiler.

LRAPA is also performing an agency-initiated modification to correct or remove the following requirements:

- The facility no longer uses pentachlorophenol as a wood treatment chemical. The existing conditions in the permit related to 40 CFR 63 – National Emission Standards for Hazardous Air Pollutants for Wood Preserving Area Sources only apply to treatment processes with any wood preservative containing chromium, arsenic, dioxins, or methylene chloride. As such, these conditions will be removed.
- LRAPA has added compliance demonstration and recordkeeping for all State Implementation Plan (SIP) and non-SIP conditions, as applicable.

The modified Standard ACDP will expire on November 10, 2025.

## About the facility

McFarland treats wood products under pressure in closed cylindrical vessels called retorts. The treatment chemicals include DCOI (Dichloro-octyl-isothiazonlinone), copper napthenate (CuNap), and a carrier oil (high flash No. 2 diesel fuel) for the wood preservatives. This facility no longer uses pentachlorophenol. The facility has been in operation since 1953.

## What air pollutants would the permit regulate?

This permit regulates emissions of the pollutants listed in the tables at the end of this document.

## How does LRAPA determine permit requirements?

LRAPA evaluates types and amounts of pollutants and the facility's location and determines permit requirements according to state and federal regulations.

#### How does LRAPA monitor compliance with the permit requirements?

This permit will require the facility to monitor pollutants using federally-, state, and locally-approved monitoring practices and standards. The facility will be required to compile this data into an annual report for submission to LRAPA for compliance evaluation. LRAPA will also perform regular compliance inspections of the facility to assure compliance with the permit requirements.

## How do I request a public hearing?

If LRAPA receives written requests from ten persons, or from an organization representing at least ten persons, LRAPA will schedule a public hearing on the draft permit. By default, this public hearing will be conducted virtually. LRAPA will provide a minimum of 30 days' notice of a public hearing, specifying the virtual platform to be used, to allow interested persons to submit oral or written comments.

If the requesting party wishes to add an in-person component to the virtual hearing, they must provide a justification for this request. This justification should explicitly outline the need for an in-person component, taking into consideration that virtual hearings are the default format due to the cost and resource limitations of the agency. If the justification is deemed sufficient by LRAPA, a hybrid hearing that includes both virtual and in-person components will be scheduled at a reasonable place and time to allow interested persons to submit oral or written comments.

## What happens after the public comment period ends?

After the public comment period ends, including any public hearing, LRAPA will consider and respond to all relevant comments received during the public comment period and may modify the proposed permit based on comments.

If a facility meets all legal requirements, LRAPA will issue the facility a modified Standard ACDP.

## Where can I get more information?

View the draft permit and review report at <u>www.lrapa.org/air-quality-protection/public-calendar</u> or contact LRAPA at:

Phone: 541-736-1056 Email: permitting@lrapa.org

To view the application and related documents in person at the LRAPA office in Springfield, Oregon, please call LRAPA at the phone number listed above to schedule an appointment.

## Non-discrimination statement

LRAPA does not discriminate on the basis of race, color, national origin, age, sex, disability, sexual orientation, or marital status in administration of its programs or activities. View LRAPA's <u>non-discrimination policy</u>.

## **Emissions limits**

**Criteria Pollutants and Greenhouse Gases:** Table 1 below presents maximum **allowable** emissions of criteria pollutants and greenhouse gases for the facility. The current emission limit reflects maximum emissions that the facility can emit under the existing permit. The proposed emission limit reflects maximum emissions that the facility would be able to emit under the proposed permit. Typically, a facility's actual emissions are less than maximum limits established in a permit; however, actual emissions can increase up to the permitted limit. A proposed emission limit of de minimis means that the facility does not emit this pollutant above the de minimis emission level as defined in LRAPA <u>title 12</u>.

#### Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)	2022 Actual Emissions (tons/yr)
Particulate matter	24	de minimis	
Coarse particulate matter (PM <sub>10</sub> )	14	de minimis	
Fine particulate matter (PM <sub>2.5</sub> )	9	de minimis	
Nitrogen oxides	39	11	2.7
Carbon monoxide	99	13	2.2
Sulfur dioxide	39	de minimis	
Volatile organic compounds	59	7.4	19
Greenhouse gases (CO <sub>2</sub> eq.)	74,000	15,906	3,242

For more information about criteria pollutants, visit EPA's Criteria Air Pollutant web page.

**Hazardous air pollutants:** This facility does not have the potential to be a major source of federal hazardous air pollutants (HAP) emissions. A major source of federal HAPs has potential emissions for an individual federal HAP that exceed 10 tons per year or potential emissions for the aggregate of all federal HAPs that exceed 25 tons per year. Table 2 lists the highest emitted single federal HAP and the aggregate of all federal HAPs emitted by the source. For more information about hazardous air pollutants, visit EPA's <u>Health Effects Notebook for Hazardous Air Pollutants</u>.

#### Table 2

Hazardous Air Pollutants	Potential Emissions (tons/yr)	Hazardous Air Pollutants	2022 Actual Emissions (tons/yr)
Naphthalene	3.9E-02	Pentachlorophenol*	1.7E-3
Total HAP Emissions	5.4E-02		5.5E-3

\*The facility no longer uses pentachlorophenol.