



PUBLIC NOTICE

Date posted: April 17, 2025

LRAPA Requests Comments on the Proposed Air Quality Permit for Emerald Forest Products, Inc.

HOW TO PROVIDE PUBLIC COMMENT

Facility name: Emerald Forest Products, Inc. Plant #1

Permit number: 202528

Permit type: Standard Air Contaminant Discharge Permit

Comments due by: May 23, 2025 at 5 p.m.

Submit written comments:

By mail: Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

By email: permitting@lrapa-or.gov

The Lane Regional Air Protection Agency invites the public to submit written comments on the conditions of the proposed air quality permit, known officially as a Standard Air Contaminant Discharge Permit (ACDP), for Emerald Forest Products, Inc. Plant #1 (“EFP” “EFP#1”, or “facility”).

Summary

LRAPA received an air quality permit renewal application for EFP located at 118 Highway 99N in Eugene, OR on February 5th, 2024. LRAPA last issued an air quality permit to EFP on July 11th, 2019 with an expiration date of July 11th, 2024. The facility submitted a renewal application prior to this expiration date and LRAPA administratively extended the existing permit until a permitting decision could be made on the renewal application. A Standard ACDP is valid for five (5) years from the date of issuance.

This facility was called into the Cleaner Air Oregon program as an existing source by LRAPA on December 15, 2021 and was required to complete a health-based air toxics risk assessment under Cleaner Air Oregon. The facility submitted a Level 3 Risk Assessment on February 29, 2024, and was approved by LRAPA on July 24, 2024. LRAPA has concluded that the results of this Level 3 Risk Assessment meet health risk standards for the community and do not require additional controls in order to be protective of public health, other than the proposed limitations on fuel oil combustion. The proposed Standard ACDP includes operational limitations to maintain this protection.

About the facility

EFP operates a veneer-drying and plywood production facility located at 118 Highway 99N in Eugene, OR. The facility was constructed in 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 final ACDP.

Where can I get more information?

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

Phone: 541-736-1056

Email: permitting@lrapa-or.gov

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 [non-discrimination policy](#).

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 [title 12](#).

Table 1

Criteria Pollutant	Current Limit (tons/yr)	Proposed Limit (tons/yr)	2024 Actual Emissions (tons/yr)
Particulate matter	34	34	14
Coarse particulate matter (PM ₁₀)	32	32	14
Fine particulate matter (PM _{2.5})	9	9	4
Nitrogen oxides	39	26	12
Carbon monoxide	99	17	8
Sulfur dioxide	39	1.0	0
Volatile organic compounds	99	79	49
Greenhouse gases (CO ₂ eq.)	74,000	41,761	10,737

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 [Health Effects Notebook for Hazardous Air Pollutants](#).

Table 2

Hazardous Air Pollutants	Potential Emissions (tons/yr)	2024 Actual Emissions (tons/yr)
Methanol (single highest HAP)	11.4	3
Total HAP Emissions	24.7	8