LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
(541) 736-1056

STANDARD AIR CONTAMINANT DISCHARGE PERMIT
STANDARD ACDP

Issued in accordance with provisions of title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:
Eagle Veneer, Inc.
215 W. 16th Avenue
Junction City, Oregon 97448

Information Relied Upon:
Application Number: 72526
Date: 9/15/2025

Facility Location:
215 W. 16th Avenue
Junction City, Oregon 97448

Land Use Compatibility Statement:
From: City of Junction City
Date: 03/17/2000

Permit Number: 200517
Permit Type: Standard
Primary SIC: 2436 – Softwood Veneer and Plywood
Issuance Date: December 22, 2022
Expiration Date: December 22, 2027
Modification Date: [Insert upon issuance]

_____ _____
Travis Knudsen, Executive Director Effective Date

Source(s) Permitted to Discharge Air Contaminants (LRAPA 37-8010):

Table 1 Code	Source Description
Part B. 12	Boilers and other fuel burning equipment over 10 MMBTU/hour heat input.
Part B. 57	Plywood manufacturing and/or veneer drying.
Part C. 3	All sources electing to maintain the source's netting basis.

ADDENDUM NO.1
Type B State NSR Simple Technical Permit Modification

In accordance with subparagraph 37-0066(4)(b)(A) of LRAPA's Rules and Regulations, the following changes have been made to the Standard Air Contaminant Discharge Permit (ACDP) No. 200517: The 50:50 natural gas-fired and steam heated veneer dryer (dryer #1) in EU-1 has been replaced with a steam-heated only veneer dryer. The VOC PSEL has been increased to reflect emissions from the new dryer. A production limit, emission factors, and source testing requirements have been added for the new dryer. In accordance with LRAPA 42-0041(3), the PSELs for PM, PM_{10}, $PM_{2.5}$, NO_x, CO and GHG have

been reduced to the facility's potential emission rate. In accordance with LRAPA 42-0020(3)(a), the PSEL for SO_2 has been removed because the facility's PTE for this pollutant is below the de minimis emission level. In accordance with LRAPA 42-0020(1) and 42-0060, the PSEL for single and total HAPs has been removed. Only the amended conditions have been included in this addendum, and all changes are in **bold.**

1.0 DEVICE, PROCESS AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION

The devices, processes, and pollution control devices regulated by this permit are the following:

Emission Unit (EU) Description	EU ID	Pollution Control Device (PCD) Description	PCD ID
Steam Heated Veneer Dryer #1 (EQ#01)	EU-1	Burley Scrubber	CD#01
NG-Fired & Steam Heated (50:50) Veneer Dryer #2 (EQ#02)		Burley Scrubber	CD#02
NG-Fired Boiler	EU-2	None	NA
Sawdust & Wood Trim Material Handling System	EU-3	Cyclone #1 (EQ#12) & Cyclone #3 (EQ#13) exhaust to Baghouse (EQ#14)	CD#6
Veneer Scarfer Saw VOC & HAP	EU-4	None	NA
Veneer Scarfer Press Resin VOC & HAP	EU-AID-5	None	NA
Paint and Ink VOC & HAP	EU-6	None	NA

5.1 PLANT SITE EMISSION LIMITS (PSELs)

Total emissions from all sources at the facility must not exceed the PSELs below. The PSELs apply to any 12 consecutive calendar month period: [LRAPA 42-0041, 42-0060]

Annual (12-month rolling) Plant Site Emission Limits
(tons per year)

Source	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	VOC	GHG (CO2e)	~~**Single HAP**~~	~~**Total HAPs**~~
Total Plant Site	**31**	**29**	**14**	**NA**	**19**	**46**	**99**	**21,022**	~~**9**~~	~~**24**~~

5.3. Alternative PSEL Compliance Demonstration

As an alternative to the calculations required by Condition 5.2, the permittee must keep rolling annual records demonstrating that none of the following operational parameters are exceeded on a rolling annual basis. An exceedance of an operational parameter is not necessarily a violation of the PSEL. Should an operational exceedance occur, the permittee shall calculate emissions for the period in accordance with Condition 5.2:

a. The permittee must not exceed 185,000,000 ft^2 (3/8" basis) of total veneer production per calendar 12-month rolling period. [LRAPA 34-016 and 42-0080(1)]

i. The permittee must not exceed 80,000,000 ft^2 (3/8" basis) of veneer production in Veneer Dryer #1 per calendar 12-month rolling period.

b. The permittee must not combust more than 350,316,356 cubic feet per year of natural gas per calendar 12-month rolling period. [LRAPA 34-016 and 42-0080(1)]

6.3 Emission Factors

The permittee must use the default emission factors provided below for calculating pollutant emissions unless alternative emission factors are approved by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by LRAPA. [LRAPA 34-016, 42-0080(4)(c)]

Emission Unit, Device or Activity	Pollutant	Emission Factor (EF)	EF Units	Testing Requirement Y/N
EU-1 Veneer Dryer #1	**PM**	**0.56**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	PM_{10}	**0.53**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	$PM_{2.5}$	**0.14**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	VOC (heated+ cooling zones +fugitives)	**1.914**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	~~**Single HAP: Methanol**~~	~~**0.068**~~	~~**Lbs/MSF ⅜" basis**~~	~~**Y see condition 7.1**~~
	~~**Total HAP**~~	~~**0.210**~~	~~**Lbs/MSF ⅜" basis**~~	~~**N**~~
EU-1 Veneer Dryer #2	$PM/PM_{10}/ PM_{2.5}$	0.15	Lbs/MSF ⅜" basis	Y see Condition 7.1
	VOC (heated+ cooling zones +fugitives)	0.374	Lbs/MSF ⅜" basis	Y see Condition 7.1
	NO_x	0.12	Lbs/MSF ⅜" basis	Y see Condition 7.1
	CO	0.66	Lbs/MSF ⅜" basis	Y see Condition 7.1
	~~**SO_2**~~	~~**1.7**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
	~~**Single HAP: Methanol**~~	~~**0.068**~~	~~**Lbs/MSF ⅜" basis**~~	~~**Y see Condition 7.1**~~
	~~**Total HAP**~~	~~**0.210**~~	~~**Lbs/MSF ⅜" basis**~~	~~**N**~~
EU-2 NG Boiler (EQ#05)	$PM/PM_{10}/ PM_{2.5}$	2.5	Lbs/MMSCF NG	N
	VOC	5.5	Lbs/MMSCF NG	N
	NO_x	100	Lbs/MMSCF NG	N
	CO	84	Lbs/MMSCF NG	N
	~~**SO_2**~~	~~**1.7**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
	~~**Single HAP: Toluene**~~	~~**0.0265**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
	~~**Total HAP**~~	~~**0.0904**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
EU-3: Sawdust & Wood	$PM/PM_{10}/ PM_{2.5}$	0.001	Lbs/BDT	N

Emission Unit, Device or Activity	Pollutant	Emission Factor (EF)	EF Units	Testing Requirement Y/N
Trim Handling System				
EU-4 Scarfer Saw	VOC	0.086	Lbs/MSF ⅜" basis	N
EU-AID-5 Scarfer Press Adhesives	VOC	0.039	Lbs/lb adhesive applied	N
	~~**Total HAP**~~	~~**0.039**~~	~~**Lbs/lb adhesive applied**~~	~~**N**~~
EU-6 Paints & Inks	VOC	0.62	Lbs/lb paint applied	N
	~~**Total HAP**~~	~~**0.113**~~	~~**Lbs/lb paint applied**~~	~~**N**~~

7.1 EU-1 (~~**2**~~ Veneer Dryer~~**s #2**~~) PSEL Emission Factor Verification Testing: PM, NOx, CO, VOC, Methanol & Formaldehyde

Within eighteen months of permit issuance, the permittee must verify the permit emission factors for PM, NOx , CO, VOC, methanol and formaldehyde, specified in Condition 6.3 for Veneer Dryer~~**s #1 and**~~ #2 of EU-1, while ~~**each**~~ **the** veneer dryer is operating at normal maximum operating rate under typical worstcase conditions that generate the highest emissions, by conducting source tests at the veneer dryer compliance demonstration points of ~~**EU-1 (Veneer Dryer #1 Burley Scrubber Exhaust Stack (EP#01) and**~~ Veneer Dryer #2 Burley Scrubber Exhaust Stack (EP#02)) using the following test methods and procedures: [LRAPA 35-0120, 35-0140]

7.2 EU-1 (Veneer Dryer #1) Emission Factor Verification Testing: PM, VOC, Methanol, and Formaldehyde

Within twelve months of startup, the permittee must verify the permit emission factors for PM and VOC for Veneer Dryer #1 in EU-1 by conducting source tests at the Veneer Dryer #1 Burley Scrubber Exhaust Stack (EP#01) using the test methods and procedures listed in Conditions 7.2.a – 7.2.h. [LRAPA 35-0120, 35-0140]

a. EPA Methods 1 through 4 must be used to determine exhaust velocity, flow rate, and O_2, CO_2 and moisture content. [LRAPA 35-0140]

b. DEQ Method 5 must be used to determine the particulate matter concentration. Alternatively, particulate matter tests can be performed using EPA Methods 5 and 202. The test must consist of three (3) runs and each test must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 scf. Particulate matter test results must be reported in grains per dry standard cubic foot (gr/dscf), pounds per hour (lb/hr), and pounds per thousand square feet on a 3/8-inch basis (lb/Msf-3/8"). [LRAPA 35-120 and 35-0140]

c. EPA Method 25A, or an LRAPA-approved alternative, must be used to determine VOC emissions. The test must consist of three (3) runs and each test run must be a minimum of 60 minutes. VOC test results must be reported on an "as propane" basis in pounds per hour (lb/hr), and pounds per thousand square feet on a 3/8-inch basis (lb/Msf-3/8"). [LRAPA 35-120 and 35-0140]

d. NCASI Method CI 98.01 (midget impingers with water; analysis by GC/FID), or an LRAPA-

approved alternative, must be used to determine methanol emissions and NCASI Method CI 98.01 (midget impingers with water; analysis by spectrophotometer), or an LRAPA-approved alternative, must be used to determine formaldehyde emissions. The test must consist of three (3) runs and each test run must be a minimum of 60 minutes. Methanol and formaldehyde emissions must be tested concurrently with VOCs. Methanol and formaldehyde emissions must be reported in pounds per hour (lb/hr) and pounds per thousand square feet on a 3/8-inch basis (lb/Msf-3/8"). [LRAPA 35-120 and 35-0140]

e. The following parameters must be monitored and recorded during the source test: [LRAPA 35-0120]

i. Veneer dryer throughput (Msf-3/8"/hr);
ii. Veneer species, thickness, and dimensions;
iii. Veneer dryer temperatures (green end and dry end – degrees F);
iv. Veneer residence time (min);
v. Amount of redry (%);
vi. Burley Scrubber water flow (gpm)

f. Each test run must be conducted while equipment is operating at levels that equal or exceed ninety percent (90%) of the design capacity, using process materials that generate the highest emissions for the pollutants being tested. [LRAPA 35- 0120(3)]

g. The performance test must be conducted in accordance with DEQ's Source Sampling Manual and the LRAPA-approved source test plan. The source test plan must be submitted at least 30 days prior to the test date. Test data and results must be submitted for review to LRAPA within 60 days unless otherwise approved in the source test plan. [LRAPA 35-0120(3)]

h. Only regular operating staff may adjust the combustion system or production processes and emission control parameters during the compliance source test and within two hours prior to the source test. Any operating adjustments made during the source test, which are a result of consultation with source testing personnel, equipment vendors or consultants, may render the source test invalid. [LRAPA 35-0120(3)]