Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit

Review Report

ADDENDUM NO 1.
(Simple Technical Permit Modification)

Eagle Veneer, Inc. **Permit No. 200517**
215 West 16th Avenue
Junction City, Oregon 97448
Website: https://www.eagleveneer.com/

Source Information:

Primary SIC	2436
Secondary SIC	NA
Primary NAICS	321212
Secondary NAICS	NA
Public Notice Category	III

Source Categories (LRAPA title 37, Table 1)	B.12: Boilers and other fuel burning equipment over 10 MMBTU/hour heat input. B.57: Plywood manufacturing and/or veneer drying. C.3: All sources electing to maintain the source's netting basis.

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	Y
Emissions credits	N
Special Conditions	N
Compliance schedule	N

Source test [date(s)]	See permit
COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements:

Annual report (due date)	March 15
Semi-Annual Report (due date)	N
SACC (due date)	N
GHG Report (due date)	March 31

Monthly report (due date)	N
Quarterly report (due dates)	N
Excess emissions report	Y
Other report	N

Air Programs:

NSPS (list subparts)	A, Dc
NESHAP (list subparts)	N
40 CFR part 64 Compliance Assurance Monitoring (CAM)	N
Regional Haze (RH)	N
TACT	N
40 CFR part 68 Risk Management	N
Cleaner Air Oregon (CAO)	N
Synthetic Minor (SM)	Y

SM-80	Y
Title V	N
Major FHAP Source	N
Federal Major Source	N
Type A State New Source Review	N
Type B State New Source Review	Y
Prevention of Significant Deterioration (PSD)	N
Nonattainment New Source Review (NNSR)	N

Permittee Identification

1. Eagle Veneer, Inc. ("Eagle Veneer" and/or "the facility") operates a veneer-drying facility at 215 W. 16th Ave in Junction City, Oregon. Unfinished dried veneer from the facility is trucked to Eagle Veneer's plywood facility in Harrisburg, Oregon (Linn County) for finishing and manufacturing plywood (Eagle Plywood Specialties assigned to ODEQ General ACDP AQGP-010, Source #22-6031).

General Background

2. Eagle Veneer, Inc., operates a veneer-drying facility in Junction City, Oregon. The facility was first permitted in 1978 under Bohemia, Inc., and has been owned and operated by Eagle Veneer, Inc., since 1990. The facility dries approximately 140 million square feet per year of veneer on a 3/8" basis. The operation consists of two (2) veneer dryers with particulate matter emissions controlled by two (2) Burley Scrubbers (replaced in July 2021) and one (1) natural gas-fired boiler (with no fuel oil backup) to provide steam for the veneer dryers. The facility typically dries heart veneer in Dryer # 1 and sap veneer in Dryer #2. The facility uses two (2) cyclones and one (1) baghouse to control particulate matter (PM) emissions from the sawdust and wood trim material handling system. The two cyclones are capped and vented to the baghouse. The operating schedule for the facility is 8,760 hours per year.

Reason for Permit Action and Fee Basis

3. This is a Simple Technical Permit modification for a Type 4 Change to replace the facility's 50:50 natural gas-fired and steam heated veneer dryer (dryer #1) in EU-1 with a steam-heated only veneer dryer. The change includes increasing the facility's VOC plant site emission limit (PSEL), and adding a veneer production limit, new emission factors, and source testing requirements for the new dryer.

   As part of this permitting action, 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 42-0041(3). The PSEL for SO_2 has been removed in accordance with LRAPA 42-0020(3)(a), because the facility's PTE for this pollutant is below the de minimis emission level listed in LRAPA title 12. The PSELs for single and total HAPs have been removed, in accordance with LRAPA 42-0020(1) and 42-0060.

Attainment Status

4. The facility is located in an attainment area for all criteria pollutants. The facility is located within 100 kilometers of three (3) Class I air quality protection areas: Diamond Peak Wilderness, Mount Washington Wilderness and Three Sisters Wilderness area.

Emission Unit Description

5. The emission units modified by this permit action 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

The 50:50 natural gas-fired and steam heated veneer dryer (dryer #1) previously in EU-1 has been replaced with a steam-heated only jet veneer dryer manufactured by COE. The new dryer has 4 decks and 3 zones. Emissions from the new dryer will be controlled by a Burley scrubber.

Production Limits

6. As an alternative to the emission calculations required by Condition 5.2 of the permit, 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.

General Emission Limitations

7. There are no changes to the general emission limitations as a result of the proposed modification.

Typically Achievable Control Technology (TACT)

8. Subsection 32-008(2) requires new units installed or existing emission units modified on or after January 1, 1994, meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR or Type A State NSR in title 38, and applicable NSPS in title 46, or any other standard applicable to only new or modified sources in title 30, title 33, title 39, or title 46 for the regulated pollutant; the source is required to have a permit; if new, the emission unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emission unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.

   8.a. The new veneer dryer (Dryer #1) in EU-1 is not subject to TACT for NO_x, SO_2, CO, or lead because it does not have emissions greater than one (1) ton per year for each of these pollutants.

   8.b. The new veneer dryer (Dryer #1) in EU-1 has emissions greater than one (1) ton per year of PM, PM_{10}, and $PM_{2.5}$, however the dryer is subject to particulate matter emission limitations under title 33 and is therefore not subject to TACT for these pollutants.

   8.c. The new veneer dryer (Dryer #1) in EU-1 is subject to TACT for VOC because it has emissions of VOC greater than one (1) ton per year. While LRAPA has not performed a formal TACT determination for VOC from this emission unit, LRAPA has determined that the use of a burley scrubber likely meets TACT for this emission unit.

New Source Performance Standards (NSPS)

9. There are no changes to NSPS applicability as a result of the proposed modification.

National Emission Standards for Hazardous Air Pollutants (NESHAP)

10. There are no changes to NESHAP applicability as a result of the proposed modification.

Plant Site Emission Limits (PSELs)

11. Provided below is a summary of the baseline emission rate, netting basis, plant site emission limits, and potential to emit:

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PTE (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)	
PM	95	78	78	53	31	31
PM_{10}	86	68	68	53	29	29
$PM_{2.5}$	NA	19	19	15	14	14
CO	59	0	59	99	46	46
NO_x	3	0	39	39	19	19
SO_2	1	0	1	39	NA	0.3
VOC	10	10	39	39	99	99
GHG	14,079	0	14,079	74,000	21,022	21,022

12. The baseline emission rates for all pollutants were established in previous permitting actions, and no changes have been made as a result of this modification.

13. The proposed netting bases were established as follows:

    13.a. The netting bases for PM, PM_{10}, and $PM_{2.5}$ were established in previous permitting actions, and no changes have been made as a result of this modification.

    13.b. The netting bases for CO, NO_x, SO_2, VOC, and GHGs were erroneously set to zero during the previous permit renewal in 2022. To correct this, the netting basis for each of these pollutants has been reset to the value established during the 2015 permit renewal.

14. The proposed PSELs were established as follows:

    14.a. In accordance with LRAPA 42-0041(3), the PSELs for PM, PM_{10}, $PM_{2.5}$, CO, NO_x, and GHGs were reduced to the potential emission rate from the significant emission units. The previous PSELs for these pollutants were set at the generic PSEL level which is no longer allowed by rule.

    14.b. 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 listed in LRAPA title 12.

    14.c. The PSEL for VOC has been increased to reflect estimated emissions from the new veneer dryer (Dryer #1) in EU-1. VOC emissions from Dryer #1 were previously based on site-specific source test data. Because site-specific VOC emissions data is not yet available for the new dryer, emissions are based on DEQ AQGP-010 Section 13.5.b., Emission Factors for Veneer Dryers. These emission factors are conservative estimates of industry averages and are notably higher than the site-specific emission factors used to estimate emissions from the previous dryer, resulting in a higher PTE for VOC.

14.d. In accordance with LRAPA 42-0020(1) and 42-0060, the PSEL for single or total HAPs has been removed. Prior to this permitting action the facility had HAP PSELs of 9 tpy for individual HAPs and 24 tpy for total HAPs. These previous HAP PSELs were based on generic PSEL levels that are no longer allowed by rule. The facility has not requested that LRAPA create an enforceable PTE limit for HAPs as part of this permitting action. The facility's HAP PTE remains below major source thresholds, as detailed in Items 22 – 24.

Significant Emission Rate

15. The PSEL increase over the netting basis is less than the Significant Emission Rate (SER) as defined in LRAPA title 12 for all pollutants except VOC as shown in the following table.

Pollutant	Proposed PSEL (TPY)	PSEL Increase Over Netting Basis (TPY)	PSEL Increase Due to Utilizing Existing Baseline Period Capacity (TPY)	PSEL Increase Due to Modification (TPY)	SER (TPY)
PM	31	0	0	0	25
PM_{10}	29	0	0	0	15
$PM_{2.5}$	14	0	0	0	10
CO	46	40	0	0	100
NO_x	19	0	0	0	40
SO_2	NA	38	0	0	40
VOC	99	60	0	60	40
GHGs	21,022	59921	0	0	75,000

Unassigned Emissions and Emission Reduction Credits

16. The facility has unassigned emissions as shown in the table below. Unassigned emissions are equal to the netting basis minus the source's current PTE, minus any banked emission reduction credits. In accordance with LRAPA 42-0055, unassigned emissions greater than the SER will be reduced to less than the applicable SER at the next permit renewal if the unassigned emissions are not used for internal netting prior to that date.

Pollutant	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM	78	31	47	0	25
PM_{10}	68	29	39	0	15
$PM_{2.5}$	19	14	5	0	10
CO	59	46	13	0	100
NO_x	39	19	20	0	40
SO_2	1	0.3	1	0	40

Pollutant	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
VOC	39	99	0	0	40
GHGs	14,079	21,022	0	0	75,000

New Source Review (NSR)

17. The source is located in an area that is designated attainment or unclassified for all regulated pollutants other than CO and PM_{10}. For pollutants other than CO and PM_{10}, the proposed PSELs are less than the federal major source threshold for non-listed sources of 250 tons per year per regulated pollutant and are not subject to Major NSR. For CO and PM_{10}, the source is located in a maintenance area. The proposed PSELs for CO and PM_{10} are less than the 100 TPY threshold that determines applicability of Major NSR in a maintenance area.

Type A and Type B State NSR

18. For regulated pollutants other than VOCs, the proposed modification will not have emissions per regulated pollutant equal to or greater than the SER over the netting basis that would require Type A or B State NSR. For VOCs, emissions increased to an amount that is equal to or greater than the SER over the netting basis. Because the source is located in an area that is attainment for ozone, VOCs are subject to Type B State NSR.

19. Within an attainment or unclassified area, a source subject to Type B State NSR must:

    19.a. Determine compliance with the NAAQS, PSD increments, and other requirements in PSD Class II and Class III areas under LRAPA 40-0050(1)&(2), as applicable.
    19.b. Since this facility will emit ozone precursors (VOC or NO_X) at or above the SER over the netting basis and the facility is located within 100 km of the Salem-Keizer ozone maintenance area, this project must also meet the requirements for demonstrating net air quality benefit under LRAPA 38-0510 and 38-0520.
    19.c. Note: Per DEQ Short-Term NAAQS Internal Management Directive FAQs (Updated March 1, 2022), if Volatile Organic Compounds or total PM emissions trigger NSR, the short-term NAAQS modeling for $PM_{2.5}$, NO_2 and SO_2 is not required because VOCs and total PM do not require modeling for their analysis.

Air Quality Analysis

20. Under LRAPA 40-0050(1), a facility must demonstrate compliance with the NAAQS, PSD increments, and other requirements in PSD Class II areas. LRAPA has performed a single source impact analysis as described below to demonstrate the proposed modification at the facility will not cause or contribute to a new violation of a NAAQS and PSD increment. This single source impact analysis is sufficient to show compliance if the modeled impact from emission increases equal to or greater than a SER above the netting basis due to the proposed modification being evaluated is less than any applicable Class II significant impact levels (SIL) specified in LRAPA title 12, Table 1. The use of the SIL by itself satisfies LRAPA 40-0050(1)(b) because the background ozone concentrations in Lane County are more than the SIL below the applicable NAAQS and the formation of ozone does not result in concentration gradients in the vicinity of the source. In addition, based on the results of the single-source impact analysis, LRAPA has

determined that the facility will not have a material effect on the Salem-Keizer ozone maintenance area under LRAPA 38-0520(2)(b).

21. The United States Environmental Protection Agency (U.S. EPA) established a two-tiered approach for addressing impacts of single-source emissions on ozone (O_3). The first tier involves the use of appropriate and technically credible relationships between emissions and ambient impacts. The second tier involves use of chemical transport modeling to obtain single-source impacts. In December 2016, U.S. EPA published a draft document, "Guidance on the Development of Modeled Emission Rates for Precursors (MERPs) as a Tier 1 Demonstration Tools for Ozone and $PM_{2.5}$ under the PSD Permitting Program". The term MERP is used to describe an emission rate of a precursor that is expected to result in a change in ambient O_3 or $PM_{2.5}$ concentration that would not cause or contribute to a violation of the NAAQS. Separate MERPs are developed for each precursor and each pollutant. Projected increases in the O_3 precursor pollutants NO_X and VOC that are below the MERP are part of a demonstration that the facility will not cause or contribute to violation of the O_3 NAAQS. Based upon the guidance, the most conservative, or lowest, MERPs from the Western US were used to determine whether the proposed emissions from the facility would cause or contribute to a violation of the NAAQS for ozone. Using the modeled concentration for the minimum MERP source in the Western US, an emission rate equivalent to a 1.0 parts per billion (ppb) impact was computed for NO_X and VOC. The facility's pollutant emissions are below these MERPs, but the contributions should be considered together to determine if the facility would cause or contribute to a violation of the NAAQS for ozone. The ratio of emissions to the MERP for each precursor were calculated and then added together. Since the sum of the ratio is not above 1.0 ppb, as shown below, the combined impact of NO_X and VOC emissions from this facility will not cause or contribute to a violation of the NAAQS for ozone.

Precursor	Western US MERP (tons)	Hypothetical Emissions (TPY)	Associated Modeled Concentration (ppb)	Eagle Veneer Emissions (TPY)	Ratio Eagle Veneer/ MERP (ppb)	Ozone SIL (ppb)
VOC	1053	1000	0.95	99	0.09	
NO_x	184	500	2.72	39	0.21	
				Total =	0.31	1.0
Calculation: Eagle Veneer O_3 contribution = (39/500 * 2.72 ppb) + (99/1000 * 0.95 ppb) = 0.31 ppb < 1.0 ppb O_3 SIL						

Federal Hazardous Air Pollutants/Toxic Air Contaminants

22. Potential annual federal hazardous air pollutant (FHAP) emissions are based on the potential to emit of the facility operating under permit limitations The highest single FHAP emitted by the facility is methanol at approximately 6.04 tons per year. The potential total FHAP emissions are 16.6 tons per year. A major source of FHAPs is defined as having potential FHAP emissions of at least 10 tons per year of any single HAP and 25 tons per year of the aggregate of all FHAPs. This facility does not have potential FHAP emissions exceeding these thresholds and is considered an area source of FHAPs.

23. Under Cleaner Air Oregon (CAO) program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. Eagle Veneer has not been notified by LRAPA and is therefore not yet required to perform a risk assessment or report annual emissions of toxic air contaminants. LRAPA required reporting of approximately 600 toxic air contaminants in 2023 and regulates approximately 260 toxic air contaminants (TAC) that have Risk Based Concentrations established in rule. All FHAPs are on the list of approximately 600

TACs. The FHAPs and TACs listed below are based upon safety data sheets and standard emission factors for the types of emission units at this facility. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their TACs. Until then, this source will be required to report TAC emissions triennially.

24. The table below represents the post-modification potential emissions of FHAP from the facility, excluding potential emissions from categorically insignificant activities. The highest single FHAP emitted by the facility is methanol.

CAS Number	Pollutant	PTE (tpy)	FHAP	CAO TAC
75-07-0	Acetaldehyde	1.82	Y	Y
107-02-8	Acrolein	0.17	Y	Y
7440-38-2	Arsenic and compounds	3.50E-05	Y	Y
71-43-2	Benzene	0.32	Y	Y
50-32-8	Benzo[a]pyrene	2.10E-07	Y	Y
7440-41-7	Beryllium and compounds	2.10E-06	Y	Y
7440-43-9	Cadmium and compounds	1.93E-04	Y	Y
18540-29-9	Chromium VI, chromate & dichromate particulate	2.45E-04	Y	Y
7440-48-4	Cobalt and compounds	1.47E-05	Y	Y
100-41-4	Ethyl benzene	6.53E-03	Y	Y
107-21-1	Ethylene glycol	0.29	Y	Y
50-00-0	Formaldehyde	2.68	Y	Y
110-54-3	Hexane	8.06E-04	Y	Y
7439-92-1	Lead and compounds	8.76E-05	Y	Y
1330-20-7	m, p-xylene	0.23	Y	Y
7439-96-5	Manganese and compounds	6.66E-05	Y	Y
7439-97-6	Mercury and compounds	4.55E-05	Y	Y
67-56-1	Methanol	6.04	Y	Y
108-10-1	Methyl isobutyl ketone	0.14	Y	Y
91-20-3	Naphthalene	5.25E-05	Y	Y
365	Nickel compounds, insoluble	3.68E-04	Y	Y
108-95-2	Phenol	2.20	Y	Y
401	Polycyclic aromatic hydrocarbons (PAHs)	1.75E-05	Y	Y
123-38-6	Propionaldehyde	1.99	Y	Y
7782-49-2	Selenium and compounds	4.20E-06	Y	Y
100-42-5	Styrene	0.08	Y	Y
108-88-3	Toluene	0.61	Y	Y
7440-62-2	Vanadium (fume or dust)	3.02E-04	Y	Y
1330-20-7	Xylene (mixture)	0.02	Y	Y
		Total (tpy):	**16.6**	**16.6**

Recordkeeping Requirements

25. There are no changes to the recordkeeping requirements as a result of the proposed modification.

Reporting Requirements

26. There are no changes to the reporting requirements as a result of the proposed modification.

Public Notice

27. Pursuant to paragraph 37-0066(4)(b), issuance of a modified Standard ACDP requires public notice as a Category I permit action for non-technical modifications and basic and simple technical modifications. Because the proposed modification would increase the facility's allowed emissions, LRAPA has moved this permit action to a Category III public notice in accordance with paragraph 31-0030(4) and will provide public notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments.

    The proposed permit will be on public notice from December 8, 2025 to January 12, 2026. Written comments may be submitted during this public comment period. If requested by ten (10) or more individuals or an individual representing a group of more than ten (10) individuals, LRAPA will schedule a public hearing on the proposed permit action. LRAPA will provide a minimum of 30 days notice for a public hearing. After the comment period and hearing (if requested), LRAPA will respond to comments received and then take final action to issue or deny the permit.

AD 11/13/2025

Emission Detail Sheets

Plant Site Emission Limits:

PLANT SITE EMISSION LIMITS										
Emission Units	PM	PM_{10}	$PM_{2.5}$	CO	NO_X	SO_2	VOC	Single HAP[1]	Aggregate HAP	GHG (CO_2e)
	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy	tpy
EU-1: Veneer Dryer #1	22.4	21.3	5.6	-	-	-	76.6	2.4	4.9	-
EU-1: Veneer Dryer #2	7.9	7.9	7.9	34.7	6.3	0.1	19.6	3.6	11.0	5255.6
EU-2: Boiler	0.3	0.3	0.3	11.0	13.1	0.2	0.7	0.0	0.012	15766.7
EU-3: Material Handling	0.0	0.0	0.0	-	-	-	-	-	-	-
EU-4: Scarfer Saw	-	-	-	-	-	-	0.8	0.11	0.12	-
EU-AID-5: Scarfer Press	-	-	-	-	-	-	0.3	-	0.3	-
EU-6: Paints & Inks	-	-	-	-	-	-	1.1	-	0.2	-
Potential to Emit (PTE)	**31**	**29**	**14**	**46**	**19**	**0.30**	**99**	**6**	**17**	**21022**
PSELs	31	29	14	46	19	0	99	NA	NA	21022
1. Single highest HAP for the facility is MeOH										

Dryer #1 Emissions:

EU-1 Veneer Dryer #1 Emissions					
Maximum Capacity:	80000	MSF 3/8"			
Pollutant	EF	EF Unit	EF Source	Emissions	
				lb/yr	tpy
PM	0.56	lb/MSF 3/8"	1	4.48E+04	22.4
PM10	0.53	lb/MSF 3/8"	2	4.26E+04	21.3
PM2.5	0.14	lb/MSF 3/8"	2	1.12E+04	5.6
NOx	-	-	-	-	-
SO2	-	-	-	-	-
CO	-	-	-	-	-
VOC	1.914	lb/MSF 3/8"	3	1.53E+05	76.6
Aggregate HAP	0.12364	lb/MSF 3/8"	3	9.89E+03	4.9
Single HAP (MeOH)	0.059	lb/MSF 3/8"	3	4.72E+03	2.4
GHG	-	-	-	-	-
1. DEQ AQGP-010					
2.DEQ AQGP-010 + AQ-EF03					
3. DEQ AQGP-010, sum of heated and cooling section + fugitives					

Dryer #1 HAPs:

	EU-1 Veneer Dryer #1 HAP Emissions					
	Pollutant	Cas No	EF[1]	EF Unit	Emissions	
					lb/yr	tpy
Heated Section	Acetaldehyde	75-07-0	0.017	lb/MSF 3/8"	1360.0	0.7
	Acrolein	107-02-8	1.30E-03	lb/MSF 3/8"	104.0	0.1
	Formaldehyde	50-00-0	0.014	lb/MSF 3/8"	1120.0	0.6
	Methanol	67-56-1	0.039	lb/MSF 3/8"	3120.0	1.6
	Phenol	108-95-2	3.40E-03	lb/MSF 3/8"	272.0	0.1
	Propionaldehyde	123-38-6	2.40E-03	lb/MSF 3/8"	192.0	0.1
	Benzene	71-43-2	5.90E-04	lb/MSF 3/8"	47.2	0.0
	Toluene	108-88-3	1.10E-03	lb/MSF 3/8"	88.0	0.0
	m, p-xylene	1330-20-7	7.50E-04	lb/MSF 3/8"	60.0	0.0
Cooling Section	Acetaldehyde	75-07-0	4.60E-03	lb/MSF 3/8"	368.0	0.2
	Formaldehyde	50-00-0	1.30E-03	lb/MSF 3/8"	104.0	0.1
	Methanol	67-56-1	0.010	lb/MSF 3/8"	800.0	0.4
	Phenol	108-95-2	6.20E-03	lb/MSF 3/8"	496.0	0.2
Fugitives	Acetaldehyde	75-07-0	5.00E-03	lb/MSF 3/8"	400.0	0.2
	Formaldehyde	50-00-0	1.00E-03	lb/MSF 3/8"	80.0	0.0
	Methanol	67-56-1	0.010	lb/MSF 3/8"	800.0	0.4
	Phenol	108-95-2	6.00E-03	lb/MSF 3/8"	480.0	0.2
				Total HAP	9891.2	4.9
				Total MeOH	4720.0	2.4
	1.Emission factors sourced from DEQ AQGP-010 Section 13.5.b., Emission Factors for Veneer Dryers					

VOC MERPS Analysis:

Precursor	Western US MERP (tons)	Hypothetical Emissions (TPY)	Associated Modeled Concnetration (ppb)	Eagle Veneer Emissions (TPY)	Ratio Eagle Veneer/MERP (ppb)	Ozone SIL (ppb)
VOC	1053	1000	0.95	99	0.09	
NOx	184	500	2.72	39	0.21	
				Total:	0.31	1.0
Calculation:						
Eagle Veneer O_3 contribution = (99/1000 * 0.95ppb) + (39/500 * 2.72 ppb) = 0.31 ppb < 1.0 ppb O_3 SIL						