



**Lane Regional Air Protection Agency
Simple Air Contaminant Discharge Permit**

Review Report

Rexius Forest By-Products Inc.

1275 Bailey Hill Road
Eugene, Oregon 97402

Permit No. 207092

Source Information:

Primary SIC	2499 – Wood Products, Not Elsewhere Classified
Primary NAICS	321999 All Other Misc. Wood Product Mfg.
Secondary SIC	5261- Retail Nurseries, Lawn and Garden Supply Stores
Secondary NAICS	444220 - Nursery, Garden Center, and Farm Supply Stores

Source Categories (LRAPA Title 37, Table 1)	B.75: Source which would have actual emissions, if the source were to operate uncontrolled, of 5 or more tons per year of direct PM ₁₀ if located in a PM ₁₀ maintenance area, or 10 tons/yr or more of any single criteria pollutant
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	N
Emission credits	N
Special Conditions	N
Compliance schedule	N

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

Reporting Requirements:

Annual report (due date)	March 15
Semi-annual reports (due dates)	N
SACC (due date)	N
GHG Report (due date)	N
Monthly report (due dates)	N

Quarterly Report (due date)	N
Excess emissions report	Y
NSPS Report (due date)	N
Other reports	N

Air Programs:

NSPS (list subparts)	N
NESHAP (list subparts)	N
CAM	N
Regional Haze (RH)	N
Synthetic Minor (SM)	N
Part 68 Risk Management	N
Title V	N
ACDP (SIP)	N
Major FHAP Source	N
Federal Major Source	N
New Source Review (NSR)	N
Prevention of Significant Deterioration (PSD)	N
Acid Rain	N
TACT	N
Cleaner Air Oregon	N

Permittee Identification

1. Rexius Forest By-Products, Inc. owns the Rexius Organics Processing Facility (“Rexius” and/or “the facility”) which produces miscellaneous wood products (landscaping and garden materials, industrial fuel, etc.) at its 95724 North Coburg Road, Coburg, Oregon, facility (address is still “Eugene”). The facility’s retail location on Highway 99 in Eugene is considered a support facility that exists because of the production facility; emissions from the Eugene retail location were not quantified.

General Background

2. The regulated emission units include but are not limited to various storage/market piles, a bagging process, diesel-fired screens, diesel-fired conveyor, diesel-fired air density separator(s), and diesel-fired horizontally-fed grinders. A propane-fired specialty products (wood) dryer is also included. Air contaminant emissions from this operation include all criteria pollutants. The Coburg facility does not employ biofiltration control that existed at the Eugene location.

Emission Unit Description

3. The emission units regulated by the permit are the following:

Emission Unit (EU) Identification	EU Description	Pollution Control Description (PCD)	Installed / Last Modified
Grinders	Two (2) Peterson Pacific Grinders, diesel-fired	Water spray system	2013, 2016
Screens	Four (4) Shaker Screens, diesel-fired	NA	2013, 2016, 2013, 2013
Dryer	One (1) Specialty Products Dryer, propane-fired	NA	2013
Bagger	One (1) Bagger	Baghouse # 1	2013
Piles	Storage and Market Piles	NA	NA
Conveyor	One (1) Stacking Conveyor, diesel-fired	NA	2016
Air Density Separators	Two (2) Air Density Separators, diesel-fired	NA	2013 and 2025

4. The facility uses the permitted equipment to produce soil, soil amendments, fertilizers, and landscaping products. Specifically, the air density separators are used to remove plastic from soil mixes. All other EUs are relatively intuitive by their descriptions in the table above.

Reason for Permit Action and Fee Basis

5. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which was issued as an initial permit on December 31, 2019 and expired on December 31, 2024. As the facility submitted a timely renewal application on September 3, 2024, the current permit will remain in effect until final action has been taken on the renewal application. A prior permit (source number 207075) was terminated in September 2013 when all materials were moved to the new site. The Coburg facility processes the same materials and operations that were employed at the Bailey Hill location. Because the actual emissions from calendar year 2024 were greater than 10 tons/year one or more criteria pollutants, this permit action is considered a Simple “high” ACDP renewal under LRAPA 37-0064(2)(a).

Attainment Status

6. The facility is located in an area that has been designated as attainment or unclassified for all criteria pollutants. The facility is outside the Eugene-Springfield UGB as defined in LRAPA 29-0010 which designates the Eugene-Springfield carbon monoxide and PM₁₀ maintenance areas. The facility is also located outside the Eugene-Springfield UGB as described in the current Eugene-Springfield Metropolitan Area General Plan, as amended.

Permitting History

7. LRAPA has reviewed and issued the following permitting actions to this facility:

Date(s) Approved/Valid	Permit Action Type	Description
12/31/19	Simple ACDP	Initial air permit
9/17/21	Basic Tech. Mod.	Addendum No. 1 to add one new diesel-fired mobile screen to EU-Screens
Upon Issuance	Simple ACDP	Renewal

Production Limitations

8. The permit includes limitations on EU-Piles, EU-Grinding, EU-Screening production to ensure PSEL compliance.

Complaints and Enforcement Actions

9. There have been no LRAPA enforcement actions performed against this facility. The former Bailey Hill facility historically received numerous odor complaints. LRAPA has received one (1) complaint for this facility at its current location.

Source Testing

10. The facility is not required to conduct source testing at this time. LRAPA is not aware of any historical source testing conducted at this facility.

Emission Limitations

11. The facility's EU-Bagger baghouse exhaust and EU-Dryer exhaust are subject to the visible emission limitations under LRAPA 32-010(3). For sources, other than wood-fired boilers, no person may emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity as a six-minute block average.
12. The facility's EU-Bagger baghouse exhaust and EU-Dryer exhaust are subject to the particulate matter emission limitations under LRAPA 32-015(2). For sources installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results, the particulate matter emission limit is 0.14 grains per dry standard cubic foot.
13. The exhausts from all engines at the facility are not regulated as stationary sources under the permit, and only the fugitive emissions are regulated from the activities associated with these non-road engines such as grinding, screening, and conveying. See also the NSPS and NESHAP sections of this Review Report.
14. The non-fuel burning equipment at the facility is subject to the process weight rate emission limitations under LRAPA 32-045(1). No person may cause, suffer, allow, or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight rate allocated to such process.

15. The facility is required to use a water spray system on the devices in EU-Grinders to prevent PM from becoming airborne.
16. The facility is required to maintain the EU-Bagger Baghouse #1 in a manner that minimizes air contaminant discharges.

Typically Achievable Control Technology (TACT)

17. LRAPA 32-008(2) requires a 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 new or modified emissions unit is not subject to a control technology requirement based on Major NSR in title 38, a Type A State NSR action under title 38, an applicable Standard of Performance for New Stationary Sources in title 46, or any other standard applicable only to new or modified sources in title 30, title 33, title 39 or title 46 for the regulated pollutant emitted; 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 air pollution control devices and emission reduction processes in use for the emissions do not represent TACT and that further emission control is necessary to address documented nuisance conditions, address an increase in emissions, ensure that the source is in compliance with other applicable requirements, or to protect public health or welfare, or the environment.
 - a. For the market storage piles (EU: Piles) the facility does not use any control technology to control dust. LRAPA has determined that there are typically not control devices or measures to control fugitive particulate from biomass and rock storage piles.
 - b. For the grinding activities (EU: Grinders), screening activities (EU: Screens), conveying activities (EU: Conveyor), and fan activities (EU: Air Density Separator) the facility is required to take reasonable precautions to prevent particulate matter from becoming airborne.
 - c. For the drying activity (EU: Dryer), LRAPA has not conducted a TACT analysis but believes no VOC controls are typically available for wood drying activities of this size.
 - d. EU-Bagger is controlled by a baghouse and is likely to meet TACT.
 - e. For the air density separator activities (EU-Air Density Separators), LRAPA has not conducted a TACT analysis but believes no PM controls are typically available for air density separators activities of this size.
 - f. All other emissions units at the facility emit less than the TACT thresholds.

Plant Site Emission Limits (PSELs)

18. Provided below is a summary of the baseline emissions rate, netting basis, and PSELs for this facility.

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PSEL Increase Over Netting Basis (TPY)	Significant Emission Rate (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)		
PM	NA	0	0	24	13	13	25
PM ₁₀	NA	0	0	14	6.0	6.0	15
PM _{2.5}	NA	0	0	9	2.9	2.9	10
CO	NA	0	0	99	--	NA	100
NO _x	NA	0	0	39	--	NA	40

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PSEL Increase Over Netting Basis (TPY)	Significant Emission Rate (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)		
SO ₂	NA	0	0	39	--	NA	40
VOC	NA	0	0	39	4.4	4.4	40
GHG	NA	0	0	NA	--	NA	75,000

- a. The facility does not have a baseline emission rate for pollutants other than PM_{2.5} and GHGs because the facility was not in operation during either the 1977 or 1978 baseline year. A baseline emission rate is not established for PM_{2.5} in accordance with LRAPA 42-0048(3). The facility has no baseline for GHGs because the facility did not request a baseline for this pollutant.
- b. The netting basis for all pollutants is 0 (zero) tons/year in accordance with LRAPA 42-0046(4) and 42-0040(2)&(3).
- c. In accordance with LRAPA 42-0041(2), the PSEL for all pollutants are set at the potential to emit level. The previous PSELs for this facility were set at the Generic PSEL levels. PSELs for NO_x, CO, SO₂, and GHG were not established since the potential to emit for these pollutants are below the respective de minimis levels in LRAPA's title 12.
- d. The baseline year, netting basis, and SER are not applicable for limiting federal HAPs. The facility does not have a potential-to-emit for federal HAPs that will exceed the major source thresholds for individual federal HAPs and aggregate federal HAPs of 10 TPY and 25 TPY, respectively.
- e. Compliance with the PSELs is determined through tracking storage pile volumes, amount of material grinded, screened, and dried, and amount of rock stored on a 12-month rolling basis to show that the respective amounts are less than the production limits listed in the permit.

Federal Hazardous Air Pollutants/Toxic Air Contaminants

19. The facility does not have a potential-to-emit for federal HAPs that will exceed the major source thresholds for individual federal HAPs and aggregate federal HAPs of 10 TPY and 25 TPY, respectively. Therefore, the facility is considered a minor or area source of federal HAPs.
20. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source 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 2016 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in the rule. All federal HAPs are on the list of approximately 600 toxic air contaminants. 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 toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.
21. Provided below is a summary of the federal HAP and CAO TAC emission estimates based on the potential emissions as calculated in the emission detail sheets.

Pollutant	CAS Number/DEQ ID	Potential Emissions (lbs/yr)	Federal HAP	CAO Air Toxic
Formaldehyde	50-00-0	180	Yes	Yes
Methanol	67-56-1	140	Yes	Yes

Toxics Release Inventory

22. The Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment, over which LRAPA has no regulatory authority. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI program. In general, [chemicals covered by the TRI program](#) are those that cause:

- Cancer or other chronic human health effects;
- Significant adverse acute human health effects; or
- Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

In 2023, this facility did not report any emissions to the TRI program. In order to report emissions to the TRI program, a facility must operate under a reportable NAICS code, meet a minimum employee threshold, and manufacture, process, or otherwise use chemicals in excess of the applicable reporting threshold for the chemical. This facility has not reported any emissions to the TRI program because they do not manufacture, process, or otherwise use chemicals in excess of the applicable reporting thresholds.

New Source Performance Standards (NSPSs)

23. 40 CFR part 60 subpart IIII – Standards of Performance for Stationary Compression Ignition Internal Combustion Engines (CI ICE) would be applicable to the facility's diesel-fired engines because they were all manufactured after the 2007 applicability date for CI ICE. However, the facility's engines do not remain in one location for more than 12 consecutive months and are therefore considered non-road engines as defined in 40 CFR 1068.30. The permit contains a requirement that the facility certify annually that none of the engines in EU-Grinders, EU-Screens, EU-Conveyor, and EU-ADS remained in one location for more than 12 consecutive months and a statement that the facility must apply for a permit modification if the engines ever remain in one location for more than 12 consecutive months.
24. 40 CFR part 60 subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines would be applicable to the facility's propane-fired dryer because it was manufactured after the 2007 applicability date for CI ICE. However, the propane-fired dryer does not contain an engine and is therefore not subject to those standards.

National Emission Standards for Hazardous Air Pollutants (NESHAPs)

25. 40 CFR part 63 subpart ZZZZ – National Emissions Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines is not applicable to any of the engines because they were manufactured after 2007 and do not remain in one location for more than 12 consecutive months and are therefore considered non-road engines as defined in 40 CFR 1068.30. The permit contains a requirement that the facility certify annually that none of the engines on the grinders remained in one location for more than 12 consecutive months and a statement that the facility must apply for a permit modification if the engines ever remain in one location for more than 12 consecutive months.

Recordkeeping Requirements

26. The facility is required to keep and maintain a record of the following information for a period of at least five (5) years.

Parameter	Units	Minimum Recording Frequency
Maintenance of Baghouse #1 on Bagger	NA	Each Occurrence
Maintenance of Water Spray System on each Grinder	NA	Each Occurrence
Hours of Operation, Fuel Type and Fuel Quantity Used in each diesel-fired Grinder, Screen, Air Density Separator (ADS), and Conveyor	Hours & Gallons	Monthly
Hours of Operation, Fuel Type and Fuel Quantity Used in the Dryer	Hours & Gallons or Pounds	Monthly
Tons of Biomass and Soils* Stored in Piles	Bone Dry Tons (BDT)	Monthly
Tons of Rock Material* Stored in Piles	Tons	Monthly
Statement of Certification in Accordance with Condition 20	NA	Annually
Log each complaint from the public and the resolution	NA	Upon receipt
Visible Emission Survey	% Opacity	Quarterly
Operation and Maintenance Plan	NA	Maintain the current version on-site
Upset log of all planned and unplanned excess emissions (See Condition G13)	NA	Per occurrence

*See emission detail sheets in review report for the various products included.

Reporting Requirements

27. An annual summary must be submitted for the information in permit Condition 18, and General Condition G15. **The report must be submitted by March 15 of each year.**
28. The facility is not subject to greenhouse gas reporting under OAR 340 Division 215 because actual greenhouse gas emissions are less than 2,500 metric tons (2,756 short tons) of CO₂ equivalents per year. If the source ever emits more than this amount, they will be required to report greenhouse gas emissions.

Public Notice

29. Pursuant to paragraph 37-0064(5)(a), issuance of a renewed Simple ACDP requires public notice as a Category III permit action allowing for a minimum of 35 days for interested persons to submit

written comments.

30. The proposed permit will be on public notice from February 26, 2026 to April 2, 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.

MH/
1/26/26

PROPOSED

Emission Details:

PTE and PSEL		
Facility totals:	PTE	PSEL
	ton/yr	ton/yr
NOx	0.3	--
CO	0.1	--
SOx	--	--
PM2.5	2.9	2.9
PM10	6.0	6.0
PM	12.7	13
VOC	4.4	4.4
GHG	--	NA

PTE is the potential to emit
 PSEL is the Plant Site Emission Limit

Biomass Storage Pile Particulate				Biomass Handling Particulate			
Pollutant	Throughput (BDT/yr)	Emission Factor (lb/ton)	Annual Emissions (tons/yr)	Material Volume (tpy)	25,000		
PM	25,000	0.1	1.3	Biomass Particulate			
PM10	25,000	0.047	0.6	Drop Points (#)	22		
PM2.5	25,000	0.015	0.2	EF (lb/ton)	4.05E-05	Biomass Piles PM (lb/year)	Biomass Drop Pt PM (lb/year)
				PM		1.0	22
PM and PM10 emission factors from Kingsford Title V Permit for Storage Pile (engineering estimate based upon EPA's AP42 for aggregate material storage)				PM10	1.91E-05	0.5	11
PM2.5 fraction (0.15) from DEQ AQEF-08				PM2.5	2.90E-06	0.1	2
Drop point estimates verified by Rexius				k (PM)	0.74		
Calculations account for EU: Conveyor as a drop point				k (PM10)	0.35		
					0.053		
				k (PM2.5)	50	Moisture content, typical hog fuel moisture content	
				M	7	Wind speed - 30-year climate normal for Eugene airport: https://www.weather.gov/pqr/ClimateBookEugen	
				u			

Rock (bulk rock and gravel, loam, sand, cinder, pumice, decomposed granite - excludes paving stones, etc.)				
Material Volume	75,000			
Drop Points (#)	7			
		Rock Piles PM	Rock Drop Pts	
	EF (lb/ton)	(lb/year)	(lb/year)	
PM	1.59E-02	1196	8372	
PM10	7.54E-03	566	3960	
PM2.5	1.14E-03	86	600	
k (PM)	0.74			
k (PM10)	0.35			
k (PM2.5)	0.053			
M	0.7	AP42 13.2.4, Mean Silt Content for crushed limestone		
u	7	Wind speed - 30-year climate normal for Eugene airport: https://www.weather.gov/pqr/ClimateBookEugene Drop point estimates verified by Rexius		
		Piles	Handling	
TOTAL		Tons/year	Tons/year	
	PM	1.8	4.2	
	PM10	0.9	2.0	
	PM2.5	0.2	0.3	
	VOC	2.4	--	

Storage Pile VOC				
Emission factors from NCASI Technical Bulletin 723, Page 14:				
Hogged Fuel		0.27 lb C/dry ton		
Bark		0.63 lb C/dry ton		
Sawdust		1.66 lb C/dry ton		
Chips/garden compost		0.72 lb C/dry ton		
				VOC as C
Garden Compost	8000 tons/yr	50% Moisture		2880
Chips	80 tons/yr	45% Moisture		31.68
Hogged Fuel	2125 tons/yr	50% Moisture		286.875
	500 tons/yr	40% Moisture		81
Sawdust	100 tons/yr	45% Moisture		91.3
Bark	1500 tons/yr	45% Moisture		519.75
	12305 tons/yr	Total	lb/yr	3890.605
				1.9 ton/yr
A rough conversion for VOC as C to Actual VOC is 1.22*(VOC as C): Actual VOC:				2.4 ton/yr

Grinding Emissions		
	Total annual material throughput (tons/yr) =	250,000
	Emission Factor	Total Annual Emissions
Pollutant	(lb/ton log)	(tons/yr)
PM	0.024	3.00
PM10	0.012	1.50
PM2.5	0.0060	0.75

Represents fugitive emissions from grinding wood/bark.
 Emission factor from EPA Region 10 Particulate Matter Potential to Emit Emission Factors for Activities at Sawmills, Excluding Boilers, Located in Pacific Northwest Indian Country (May 2014) for log debarking, based on guidance from Bay Area Air Quality Management District Permit Handbook for Tub Grinders. Assumes that emissions from log debarking are similar and representative of emissions from wood grinding.
 Capacity emissions were not attempted to be estimated for grinding

Screening and Air Density Separator (ADS aka "Fan") Emissions		
Total annual material throughput (tons/yr) =		250,000
Pollutant	Emission Factor (lb/ton)	Total Annual Emissions (tons/yr)
PM	0.025	3.13
PM10	0.0087	1.09
PM2.5	0.0087	1.09

Represents fugitive emissions from screening wood/bark and for the air density separators used to remove plastic from soil and biomass.
 Emission factor from EPA AP42 Table 11.19.2-2 for Screening
 Assume for estimation purposes that crushed stone screening is and representative of emissions from wood screening.
 Capacity emissions were not attempted to be estimated for screening

Drying Emissions:		
Assume :	2000 BDT/yr	
Pollutant	Emission Factor (lb/ODT)	Annual Emissions (ton/yr)
NOx	0.31	0.31
CO	0.12	0.12
SOx	--	--
PM/PM10/PM2.5	0.54	0.54
VOC	2.00	2.00
Formaldehyde	0.0086	0.009
Methanol	0.073	0.07

Emission factors are from AP-42 Table 10.6.2-1, 2 and 3 for a rotary dryer, direct natural gas-fired, softwood, uncontrolled
 These represent the best available factors for the specialty products dryer at Rexius.
 Assume all PM = PM2.5

Baghouse Emissions:	
Baghouse #1 collects:	1.56 BDT/year
Tons to baghouse:	1.56 BDT/year
Tons to atmosphere:	0.0015616 ton/yr
Baghouse estimated to be 99.9% efficient	
Bagger building baghouse installed in 2013	
Assume all PM = PM2.5	

References	
EPA AP-42 13.2.4 Aggregate Handling and Storage Piles for PM, PM10, PM2.5	
PM2.5 fraction (0.15) from DEQ AQEF-08	
VOC emission factor for biomass types are from NCASI Tech Bull. 723 Pg 14, converted from as-carbon to as-VOC (x1.22)	
Bark includes bark, mulch, wood shavings, wood chips and wood nuggets	
Soils includes planting soils, composts, and potting mixes	
Rock includes loam, river sand, rock, concrete mix, cinder, pumice, sand, cobblestone, and granite	
Capacity emissions were not attempted to be estimated for storage piles	