



BASIC AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Oregon Military Department
P.O. Box 14350
Salem, OR 97309-5047

INFORMATION RELIED UPON:

Application No.: 69638
Date Received: 7/24/2023

PLANT SITE LOCATION:

Lane County Readiness Center
3106 Pierce Parkway
Springfield, OR 97477

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Springfield
Approval Date: 3/11/2022

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director

8-11-23

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 2.	Boilers and other fuel-burning equipment (with or without #2 diesel oil back-up) of 2.0 or more MMBTU but less than 10 MMBTU/hour heat input.	9711

1.0 PERMIT ISSUANCE

- 1.1 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a General, Simple or Standard ACDP, if applicable. [LRAPA 37-0052(4)(a)]

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. Emissions from any air contaminant source must not equal or exceed 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(3)]
 - b. Observations must be recorded at 15-second intervals as specified in LRAPA 32-010(2).
 - c. The visible emissions standard in this condition does not apply to fugitive emissions from the source. [LRAPA 32-010(1)]
- 2.2 Particulate Matter Weight Standards - New Combustion Sources** Particulate matter emissions from any air contaminant source must not exceed 0.14 grains per dry standard cubic foot, corrected to 50 percent excess air for fuel burning equipment that burns fuels other than wood. [LRAPA 32-030(1)(b), 32-030(3) and 32-030(3)(b)]
- 2.3 Particulate Matter Fallout** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]
- 2.4 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010]
- 2.5 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by DEQ.

3.0 RECORDKEEPING REQUIREMENTS

- 3.1 Monitoring Requirements** The permittee must monitor and maintain records of the operation and maintenance of the plant and associated air contaminant control devices as follows: [LRAPA 34-016(1)]
- a. The total amount of natural gas combusted by the facility, in therms or million cubic feet, during the previous calendar year:
- 3.2 Operation and Maintenance** The permittee must maintain all records associated with continuous monitoring data, including, but not limited to, original data sheets, charts, calculations, calibration data, production records and final reports related to the operation and maintenance of the plant and associated air contaminant control devices. [LRAPA 34-016(1)]
- 3.3 Excess Emissions** The permittee must maintain records of excess emissions as defined in LRAPA title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. Excess emissions are evident when visible emissions are greater than 20% opacity for a period or periods aggregating more than three minutes in any one hour. [LRAPA 36-025]
- 3.4 Complaint log** The permittee must maintain a log of all written complaints and complaints received via telephone, fax, or email that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. [LRAPA 34-016(1)]
- 3.5 Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of at least five (5) years and be made available to LRAPA upon request. [LRAPA 34-016(5)]

4.0 REPORTING REQUIREMENTS

- 4.1 Excess Emissions** The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health. [LRAPA 36-020]
- a. Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 6.2.

- b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - c. The permittee must also submit follow-up reports when required by LRAPA.
- 4.2 Annual Report**

The permittee must submit to LRAPA by **February 15** of each year this permit is in effect the following information for the preceding calendar year: [LRAPA 34-016(2)]

 - a. The total amount of natural gas combusted by the facility, in therms or million cubic feet, during the previous calendar year.
 - b. Records of all planned and unplanned excess emissions events.
 - c. Summary of complaints relating to air quality received by the permittee during the year.
- 4.3 Notice of Change of Ownership or Company Name**

The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following: [LRAPA 37-0030(4)]

 - a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
 - b. Sale or exchange of the activity or facility.
- 4.4 Construction or Modification Notices**

The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with LRAPA 34-010 through 34-038 before:

 - a. Constructing, installing, or establishing a new source that will cause an increase in any regulated pollutant emissions; [LRAPA 34-034(1)]
 - b. Making a physical change or change in operation of an existing source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or [LRAPA 34-034(2)]
 - c. Constructing or modifying any air pollution control device. [LRAPA 34-034(3)]
- 4.5 Where to Send Reports and Notices**

All reports, notices, and applications should be directed to the LRAPA office identified in Condition 6.2.

5.0 ADMINISTRATIVE REQUIREMENTS

- 5.1 Renewal of the Basic Permit** A complete application for renewal of this permit is due within 30 days prior to expiration. [LRAPA 37-0040(2)(b)(A)]
- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is renewed.
 - b. The permittee may submit an application for either a General, Simple or Standard ACDP at any time, but the permittee must continue to comply with the Basic ACDP until LRAPA takes final action on the General, Simple or Standard ACDP application.
 - c. If a complete application for renewal of the Basic ACDP or General, Simple or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.
- 5.2 Where to Send Renewal Application** All reports, notices, and applications should be directed to the LRAPA office identified in Condition 6.2.

6.0 FEES

- 6.1 Annual Fees** The Annual Fees specified in LRAPA title 37, Section 37-8020, Table 2, Part 2.b. and 3.b. for a Basic ACDP are due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date. [LRAPA 37-0056(2)]
- 6.2 Where to Submit Fees** Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056
www.lrapa.org

7.0 GENERAL CONDITIONS AND DISCLAIMERS

- 7.1 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 7.2 Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 7.3 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050]
- 7.4 LRAPA Access** The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468-095.
- 7.5 Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 7.6 Outdoor Burning** The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.
- 7.7 Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 7.8 Property Rights** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 7.9 Termination, Revocation, or Modification** LRAPA may terminate, modify or revoke this permit in accordance with LRAPA title 37, section 37-0082 and section 37-0084.

8.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSPS	New Source Performance Standard
ASTM	American Society for Testing and Materials	NSR	New Source Review
AQMA	Air Quality Maintenance Area	O ₂	Oxygen
calendar year	The 12-month period beginning January 1st and ending December 31st	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
CO	Carbon monoxide	O&M	Operation and maintenance
DEQ	Oregon Department of Environmental Quality	Pb	Lead
dscf	Dry standard cubic foot	PCD	Pollution control device
EPA	US Environmental Protection Agency	PM	Particulate matter
FCAA	Federal Clean Air Act	PM ₁₀	Particulate matter less than 10 microns in size
gal	Gallon(s)	PM _{2.5}	Particulate matter less than 2.5 microns in size
gr/dscf	Grains per dry standard cubic foot	ppm	Part per million
HAP	Hazardous Air Pollutant as defined by LRAPA title 44	PSD	Prevention of Significant Deterioration
ID	Identification number	PSEL	Plant Site Emission Limit
O&M	Operation and maintenance	PTE	Potential to Emit
lb	Pound(s)	RACT	Reasonably Available Control Technology
LRAPA	Lane Regional Air Protection Agency	scf	Standard cubic foot
MMBtu	Million British thermal units	SER	Significant Emission Rate
NA	Not applicable	SIC	Standard Industrial Code
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SIP	State Implementation Plan
NO _x	Nitrogen oxides	SO ₂	Sulfur dioxide
		Special Control Area	As defined in LRAPA title 29
		VE	Visible emissions
		VOC	Volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Oregon Military Department
 Lane County Readiness Center
 3106 Pierce Parkway
 Springfield, OR 97477
<https://www.oregon.gov/omd>

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
Feb 15	NA	NA	NA	NA	Category I

1. The proposed permit is an initial permit for an existing facility constructed in 2004 at 3106 Pierce Parkway in Springfield, Oregon.
2. The permittee operates a joint military facility shared by the Army, Navy, Marines, and other government agencies. The facility includes offices, classrooms, and a mechanic shop. The primary industrial classifications for this facility are SIC Code 9711 – National Security and NAICS Code 928110 – National Security.
3. The significant emission units at this facility include two (2) natural-gas fired boilers with a maximum heat input rating of 3.0 MMBtu per hour each.
4. This facility qualifies for a Basic ACDP because the facility consists of individual fuel burning equipment that has a total maximum heat input rating of 2.0 or more MMBtu per hour but less than 10 MMBtu per hour.
5. The facility is not subject to any New Source Performance Standard (NSPS)
6. The facility is an area source of federal hazardous air pollutants. The facility is not subject to any area or major source National Emission Standards for Hazardous Air Pollutants (NESHAP), including 40 CFR 63 subpart JJJJJJ (6J) – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers.
7. The facility is located in an area that has been designated attainment/unclassified for PM_{2.5}, ozone (VOC), NO₂, SO₂, Pb and a maintenance area for CO and PM₁₀.
8. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases, the emissions will not exceed 5 tons of PM or PM₁₀

or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.

9. Pursuant to LRAPA subsection 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA paragraph 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

JJW/rr
07/26/2023

Oregon Military Department
 Permit Number: 206133
 Emission Detail Sheets
 Boiler Emissions

Boiler Specification

Max Heat Input	6.0	MMBtu/hr
Heat Value - NG	1,026	MMBtu/MMCF
Max Hrs Operation	8,760	hr/yr

Criteria Pollutants

Pollutant	Emission Factor	Emission Factor Units	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)
PM/PM10/PM2.5	2.5	lbs/MMCF	1.5E-02	6.4E-02
Carbon Monoxide	84	lbs/MMCF	0.49	2.15
Nitrogen Oxides	100	lbs/MMCF	0.58	2.56
Sulfur Dioxide	1.7	lbs/MMCF	9.9E-03	4.4E-02
VOCs	5.5	lbs/MMCF	3.2E-02	1.4E-01
GHGs (CO2 equiv.)	117	lbs/MMBtu	703	3,077

FHAP/CAO Air Toxic Emissions

Pollutant	Federal HAP (Y/N)	CAO Air Toxic (Y/N)	NG Emission Factor (lb/MMCF)	Potential Hourly Emissions (lbs/hr)	Potential Annual Emissions (TPY)
Organics/Gases					
Benzene	Y	Y	0.008	4.7E-05	2.0E-04
Formaldehyde	Y	Y	0.017	9.9E-05	4.4E-04
Polycyclic aromatic hydrocarbons	Y	Y	0.0001	5.8E-07	2.6E-06
Benzo[a]pyrene	Y	Y	0.0000012	7.0E-09	3.1E-08
Naphthalene	Y	Y	0.0003	1.8E-06	7.7E-06
Acetaldehyde	Y	Y	0.0043	2.5E-05	1.1E-04
Acrolein	Y	Y	0.0027	1.6E-05	6.9E-05
Ammonia	N	Y	3.2	1.9E-02	8.2E-02
Ethyl benzene	Y	Y	0.0095	5.6E-05	2.4E-04
Hexane	Y	Y	0.0063	3.7E-05	1.6E-04
Toluene	Y	Y	0.0366	2.1E-04	9.4E-04
Xylenes	Y	Y	0.0272	1.6E-04	7.0E-04
Metals					
Arsenic and compounds	Y	Y	0.0002	1.2E-06	5.1E-06
Barium and compounds	N	Y	0.0044	2.6E-05	1.1E-04
Beryllium and compounds	Y	Y	0.000012	7.0E-08	3.1E-07
Cadmium and compounds	Y	Y	0.0011	6.4E-06	2.8E-05
Chromium VI	Y	Y	0.0014	8.2E-06	3.6E-05
Cobalt and compounds	Y	Y	0.000084	4.9E-07	2.2E-06
Copper and compounds	N	Y	0.00085	5.0E-06	2.2E-05
Lead and compounds	Y	Y	0.0005	2.9E-06	1.3E-05
Manganese and compounds	Y	Y	0.00038	2.2E-06	9.7E-06
Mercury and compounds	Y	Y	0.00026	1.5E-06	6.7E-06
Molybdenum trioxide	N	Y	0.00165	9.6E-06	4.2E-05
Nickel compounds	Y	Y	0.0021	1.2E-05	5.4E-05
Selenium and compounds	Y	Y	0.000024	1.4E-07	6.1E-07
Vanadium (fume or dust)	N	Y	0.0023	1.3E-05	5.9E-05
Zinc and compounds	N	Y	0.029	1.7E-04	7.4E-04

Max Individual FHAP = 9.4E-04 TPY
 Total FHAP = 2.8E-03 TPY

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	GWP
Carbon Dioxide (CO2)	53.06	1
Methane (CH4)	1.0E-03	25
Nitrous Oxide (N2O)	1.0E-04	298

Notes:

NG combustion criteria pollutant emissions are from ODEQ AQ-EF05 - Emission Factors from Gas Fired Boilers (uncont. medium boilers < 100 million Btu/hr).
 NG combustion GHG emissions are from US EPA 40 CFR 98, Tables C-1 and C-2 and the appropriate GWP.
 FHAP and CAO Air Toxic emission factors are from the DEQ 2020 ATEI Combustion Tool for natural gas external combustion with a maximum heat input rating of less than 10 MMBtu per hour, except for the ammonia emission factor.
 The ammonia emission factor is from US EPA WebFIRE SCC 10200603 for natural gas industrial boilers rated at less than 10 MMBtu per hour.
 The facility consists of two natural gas boilers, each with a maximum heat input rating of 3.0 MMBtu per hour.