



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

Review Report

Lane Forest Products, Inc.

2111 Prairie Road, Eugene
http://laneforest.com/

Permit No. 204741

Source Information:

Primary SIC	2875 – Fertilizers, mixing only
Secondary SIC	5261– Lawn and Garden Supply Stores
Primary NAICS	325314 – Fertilizers, mixing only
Secondary NAICS	444220– Lawn and Garden 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 15th
Semi-annual reports (due dates)	N
SACC (due date)	N
GHG Report (due date)	N

Quarterly Report (due date)	N
Monthly Report (due dates)	N
Excess Emissions Report	Y
Other Reports (due date)	N

Air Programs

NSPS (list subparts)	N
NESHAP (list subparts)	ZZZZ
CAM	N
Regional Haze (RH)	N
Synthetic Minor (SM)	N
SM-80	N
Title V	N
Part 68 Risk Management	N
ACDP (SIP)	N
Major FHAP Source	N
Federal Major Source	N
NA New Source Review (NSR)	N
Prevention of Significant Deterioration (PSD)	N
Acid Rain	N

Clean Air Mercury Rule (CAMR)	N
TACT	N
>20 Megawatts	N
Cleaner Air Oregon	N

Permittee Identification

1. Lane Forest Products, Inc. produces miscellaneous wood products (landscaping and garden materials, industrial fuel, chips for paper production, etc.) at its 2111 Prairie Road, Eugene, Oregon, facility. The facility at 2111 Prairie Road in Eugene is the only site owned by Lane Forest Products that currently requires an ACDP. The locations at the facility's 42nd Street operations in Springfield and the facility's retail location in Glenwood are considered support facilities that exist because of the 2111 Prairie Road facility; emissions from the Springfield and Glenwood locations were not attempted to be quantified. Additionally, LRAPA has not evaluated nor is LRAPA requiring an ACDP for the Junction City composting and material handling operations. This permit regulates the activities at the Prairie Road facility only.

General Background

2. The regulated emission units are various storage/market piles, materials handling equipment, one (1) electric-powered grinder, five (5) portable diesel-fired horizontally-fed grinders, several electrically-powered screens, and one (1) diesel-fired screen. Of all the diesel-fired equipment, only the screen (SC-4) remains onsite for greater than 12 consecutive months and is subject to stationary permitting regulations.

Emission Unit Descriptions

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

Emission Unit ID	Description	Date Manufactured
G-09	Grinder fired on fuel oil, 765 Hp, 18.099 displacement liters/cylinder	03/05/07
G-12	Grinder fired on fuel oil, 765 Hp, 18.099 displacement liters/cylinder	09/22/09
G-15	Grinder fired on fuel oil, 765 Hp, 18.099 displacement liters/cylinder	06/06/12
G-16	Grinder fired on fuel oil, 765 Hp, 18.099 displacement liters/cylinder	04/21/16
G-18	Grinder fired on fuel oil, 765 Hp, 18.099 displacement liters/cylinder	02/01/18
E-120	Grinder, electrically powered, 600 Hp	04/12/22
Piles	Market Storage Piles: biomass, soils, and rock products	NA
Screens	Screens, electrically powered	NA
SC-4	Screen fired on fuel oil, 89.7 Hp, 1.3 displacement liters/cylinder	10/2000

Reasons for Permit Action and Fee Basis

4. This permit action is a renewal for an existing Simple Air Contaminant Discharge Permit (Simple ACDP) which was issued on April 11, 2018 and expired on April 11, 2023. As the facility submitted a timely renewal application on November 3, 2023, the current permit will remain in effect until final action has been taken on the renewal application. Because the actual emissions from calendar year 2022 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

5. The facility is located in an area that has been designated as attainment or unclassified for all criteria pollutants. The facility is inside 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 inside the Eugene-Springfield UGB as described in the current Eugene-Springfield Metropolitan Area General Plan, as amended.

Permitting History

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

Date(s) Approved/Valid	Permit Action Type	Description
11/02/01	Minimal ACDP	Initial air permit
11/02/06	Regular ACDP	Renewed air permit
01/25/12	Simple ACDP	Renewed air permit
04/11/18	Simple ACDP	Renewed air permit
Upon Issuance	Simple ACDP	Renewal

Enforcement History

7. The facility was issued a Notice of Non-Compliance (NON) No. 1052 on 08/02/94 for failure to take reasonable precautions to prevent particulate matter from becoming airborne. The violation occurred on 08/01/94. The NON required the facility to respond within 20 days with a plan and schedule to control and minimize potential emissions from the plant site including methods that were presently used to control and minimize potential emissions. The facility responded on 08/18/94 with the required plan and the file was closed.
8. The facility was issued a Notice of Non-Compliance (NON) and Notice of Civil Penalty Assessment (NCP) No. 00-1904 for failure to take reasonable precautions to prevent particulate matter from becoming airborne. The violation occurred on 05/09/00 and the NCP was issued on 06/15/00 with a civil penalty assessed in the amount of \$1,400. The facility requested and LRAPA agreed to a reduced penalty. The facility paid \$1,050 and the file was closed on 08/25/00.
9. The facility was issued a Notice of Non-Compliance (NON) and Notice of Civil Penalty Assessment (NCP) No. 01-2280 for failure to take reasonable precautions to prevent particulate matter from becoming airborne. The violation occurred on 09/20/01 and the NCP was issued on 11/07/01 with a civil penalty assessed in the amount of \$1,300. The facility requested and LRAPA agreed to a reduced penalty. The facility paid \$650 on 12/17/01 and the file was closed.
10. The facility was issued a Notice of Non-Compliance (NON) and Notice of Civil Penalty Assessment (NCP) No. 02-2417 for failure to take reasonable precautions to prevent particulate matter from becoming airborne. The violation occurred on 06/13/02 and the NCP was issued on 07/24/02 with a civil penalty assessed in the amount of \$1,800. The facility requested and LRAPA agreed to a reduced penalty. The facility paid \$900 on 08/28/02 and the file was closed.

Source Testing

11. 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

12. The facility's screen SC-4 engine exhaust is 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 for a period or periods aggregating more than three (3) minutes in any one (1) hour. An Operations and Maintenance Plan (O&M Plan) will be used to ensure that the facility is complying with this limitation.
13. The non-fuel burning equipment at this facility 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.

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. Process weight is the total weight of all materials introduced into a piece of process equipment. Liquid and gaseous fuels and combustion air are not included in the total weight of all materials.
15. The fuel burning equipment at this facility are subject to the particulate matter emission limitations under LRAPA 32-030(1)(b). For fuel burning equipment sources installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015, for which there are no representative compliance source test results prior to April 16, 2015, the particulate matter emission limit is 0.14 grains per dry standard cubic foot. An Operations and Maintenance Plan (O&M Plan) will be used to ensure that the facility is complying with this limitation.
16. There are no emission limitations on the screens (EU: Screens) or the electrically powered grinder (EU: E-120). LRAPA did not attempt to quantify the emissions from screens or from grinder fugitive emissions; no emission factors were found for either EU.

Typically Achievable Control Technology (TACT)

17. LRAPA 32-008(1) requires an existing unit at a facility to meet TACT if the emission unit meets the following criteria: The emission unit is not already subject to emission standards for the regulated pollutant under LRAPA title 30, title 32, title 33, title 38, title 39 or title 46 at the time TACT is required; the source is required to have a permit; the emission unit has emissions of criteria pollutants equal to or greater than five (5) tons per year of particulate or ten (10) tons per year of any gaseous pollutant; 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.
 - 17a. For the screen fired on fuel oil (EU: SC-4), the facility is subject to the 40 CFR part 63 Subpart ZZZZ requirements that are equivalent to the requirements in tile 46. TACT is not applicable to any individual grinder engine emissions.
 - 17b. For the market storage piles (EU: Piles) the facility does not use any control technology. LRAPA has determined that there are typically not control devices or measures to control VOCs from biomass storage piles.
 - 17c. Operation of water spray systems on grinders as needed to prevent particulate matter from becoming airborne are considered TACT.
 - 17d. Emissions from the other devices or EUs were not quantified and/or assumed to be 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	20	NA	25
PM ₁₀	NA	0	0	14	14	NA	15
PM _{2.5}	NA	0	0	9	3.7	NA	10

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)		
CO	NA	0	0	99	--	NA	100
NO _x	NA	0	0	39	--	NA	40
SO ₂	NA	0	0	39	--	NA	40
VOC	NA	0	0	39	39	3.9	40
GHG	NA	0	0	NA	--	NA	75,000

- 18a. 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.
- 18b. The netting basis for all pollutants is 0 (zero) in accordance with LRAPA 42-0046(4) and 42-0040(2)&(3).
- 18c. 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.
- 18d. 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.
- 18e. Compliance with the PSELs is determined through tracking storage pile volumes, amount of material grinded and screened, 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. The emissions from the diesel-fired screen are based on the maximum annual fuel consumption, and the facility is required to report the amount of fuel consumption as part of the annual report.

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. The highest potential emission for

an individual HAP is formaldehyde at 207 lbs/year. The potential emissions in aggregate of all federal HAPs is approximately 400 lbs/year.

Pollutant	CAS Number/DEQ ID	Potential Emissions (lbs/yr)	Federal HAP	CAO Air Toxic
Organics				
Benzene	71-43-2	0.47	Yes	Yes
1,3-Butadiene	106-99-0	0.54	Yes	Yes
Cadmium and compounds	7440-43-9	0.00	Yes	Yes
Formaldehyde	50-00-0	4.32	Yes	Yes
Chromium VI, chromate and dichromate particulate	18540-29-9	0.00	Yes	Yes
Arsenic and compounds	7440-38-2	0.00	Yes	Yes
Lead and compounds	7439-92-1	0.02	Yes	Yes
Nickel compounds, insoluble	365 (DEQ ID)	0.01	Yes	Yes
Naphthalene	91-20-3	0.05	Yes	Yes
Polycyclic aromatic hydrocarbons (PAHs)	401 (DEQ ID)	0.09	No	Yes
Acetaldehyde	75-07-0	1.96	Yes	Yes
Acrolein	107-02-8	0.08	Yes	Yes
Ammonia	7664-41-7	7.25	No	Yes
Copper and compounds	7440-50-8	0.01	No	Yes
Ethyl benzene	100-41-4	0.03	Yes	Yes
Hexane	110-54-3	0.07	Yes	Yes
Hydrochloric acid	7647-01-0	0.47	Yes	Yes
Manganese and compounds	7439-96-5	0.01	Yes	Yes
Mercury and compounds	7439-97-6	0.01	Yes	Yes
Selenium and compounds	7782-49-2	0.01	Yes	Yes
Toluene	108-88-3	0.26	Yes	Yes
Xylene (mixture), including m-xylene, o-xylene, p-xylene	1330-20-7	0.11	Yes	Yes
Diesel particulate matter	200 (DEQ ID)	83.75	No	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 2021, 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 grinder engines fired on fuel oil because they were all manufactured after the 2007 applicability date for CI ICE. However, the facility’s grinder engines do not remain on site 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 onsite for more than 12 consecutive months and a statement that the facility must apply for a permit modification if the engines ever remain onsite for more than 12 consecutive months.
- 24. 40 CFR part 60 subpart JJJJ – Standards of Performance for Stationary Spark Ignition Internal Combustion Engines is not applicable to the facility’s grinder engines because none of the generator engines are spark ignition internal combustion engines.

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 applicable to the one (1) diesel-fired engine on the screen SC-4 since it remains onsite for more than 12 consecutive months and was manufactured prior to 2007. The SC-4 engine meets the applicability in 40 CFR 63.6585(a)(1) and (c), and 63.6590(a)(1)(iii).

40 CFR part 63 subpart ZZZZ Table 2.d: Requirements for Existing Stationary RICE located at Area Source of HAP Emissions

For each...	Meet the following requirements, except during periods of startup
Non-Emergency, non-black start CI stationary RICE ≤300 HP	a. Change oil and filter every 1,000 hours of operation or annually, whichever comes first; ¹
	b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;
	c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.

¹ Sources have the option to utilize an oil analysis program as described in 40 CFR 63.6625(i) or (j) in order to extend the specified oil change requirement in the table above.

40 CFR part 63 subpart ZZZZ Table 8: Applicability of General Provisions to 40 CFR part 63 subpart ZZZZ.

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.1	General applicability of the General Provisions	Yes.	
§ 63.2	Definitions	Yes.	Additional terms defined in § 63.6675 .
§ 63.3	Units and abbreviations	Yes.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.4	Prohibited activities and circumvention	Yes.	
§ 63.5	Construction and reconstruction	Yes.	
§ 63.6(a)	Applicability	Yes.	
§ 63.6(b)(1)-(4)	Compliance dates for new and reconstructed sources	Yes.	
§ 63.6(b)(5)	Notification	Yes.	
§ 63.6(b)(6)	[Reserved]		
§ 63.6(b)(7)	Compliance dates for new and reconstructed area sources that become major sources	Yes.	
§ 63.6(c)(1)-(2)	Compliance dates for existing sources	Yes.	
§ 63.6(c)(3)-(4)	[Reserved]		
§ 63.6(c)(5)	Compliance dates for existing area sources that become major sources	Yes.	
§ 63.6(d)	[Reserved]		
§ 63.6(e)	Operation and maintenance	No.	
§ 63.6(f)(1)	Applicability of standards	No.	
§ 63.6(f)(2)	Methods for determining compliance	Yes.	
§ 63.6(f)(3)	Finding of compliance	Yes.	
§ 63.6(g)(1)-(3)	Use of alternate standard	Yes.	
§ 63.6(h)	Opacity and visible emission standards	No.	Subpart ZZZZ does not contain opacity or visible emission standards.
§ 63.6(i)	Compliance extension procedures and criteria	Yes.	
§ 63.6(j)	Presidential compliance exemption	Yes.	
§ 63.7(a)(1)-(2)	Performance test dates	Yes.	Subpart ZZZZ contains performance test dates at §§ 63.6610 , 63.6611 , and 63.6612 .
§ 63.7(a)(3)	CAA section 114 authority	Yes.	
§ 63.7(b)(1)	Notification of performance test	No.	
§ 63.7(b)(2)	Notification of rescheduling	No.	
§ 63.7(c)	Quality assurance/test plan	No.	
§ 63.7(d)	Testing facilities	Yes.	
§ 63.7(e)(1)	Conditions for conducting performance tests	No.	Subpart ZZZZ specifies conditions for conducting performance tests at § 63.6620 .
§ 63.7(e)(2)	Conduct of performance tests and reduction of data	Yes.	Subpart ZZZZ specifies test methods at § 63.6620 .
§ 63.7(e)(3)	Test run duration	Yes.	
§ 63.7(e)(4)	Administrator may require other testing under section 114 of the CAA	Yes.	
§ 63.7(f)	Alternative test method provisions	Yes.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.7(g)	Performance test data analysis, recordkeeping, and reporting	Yes.	
§ 63.7(h)	Waiver of tests	Yes.	
§ 63.8(a)(1)	Applicability of monitoring requirements	Yes.	Subpart ZZZZ contains specific requirements for monitoring at § 63.6625 .
§ 63.8(a)(2)	Performance specifications	Yes.	
§ 63.8(a)(3)	[Reserved]		
§ 63.8(a)(4)	Monitoring for control devices	No.	
§ 63.8(b)(1)	Monitoring	Yes.	
§ 63.8(b)(2)-(3)	Multiple effluents and multiple monitoring systems	Yes.	
§ 63.8(c)(1)	Monitoring system operation and maintenance	Yes.	
§ 63.8(c)(1)(i)	Routine and predictable SSM	No.	
§ 63.8(c)(1)(ii)	SSM not in Startup Shutdown Malfunction Plan	Yes.	
§ 63.8(c)(1)(iii)	Compliance with operation and maintenance requirements	No.	
§ 63.8(c)(2)-(3)	Monitoring system installation	Yes.	
§ 63.8(c)(4)	Continuous monitoring system (CMS) requirements	Yes.	Except that subpart ZZZZ does not require Continuous Opacity Monitoring System (COMS).
§ 63.8(c)(5)	COMS minimum procedures	No.	Subpart ZZZZ does not require COMS.
§ 63.8(c)(6)-(8)	CMS requirements	Yes.	Except that subpart ZZZZ does not require COMS.
§ 63.8(d)	CMS quality control	Yes.	
§ 63.8(e)	CMS performance evaluation	No.	
§ 63.8(f)(1)-(5)	Alternative monitoring method	Yes.	Except that § 63.8(f)(4) only applies as specified in § 63.6645 .
§ 63.8(f)(6)	Alternative to relative accuracy test	No.	
§ 63.8(g)	Data reduction	Yes.	Except that provisions for COMS are not applicable. Averaging periods for demonstrating compliance are specified at §§ 63.6635 and 63.6640 .
§ 63.9(a)	Applicability and State delegation of notification requirements	Yes.	
§ 63.9(b)(1)-(5)	Initial notifications	No.	
§ 63.9(c)	Request for compliance extension	No.	
§ 63.9(d)	Notification of special compliance requirements for new sources	No.	
§ 63.9(e)	Notification of performance test	No.	
§ 63.9(f)	Notification of visible emission (VE)/opacity test	No.	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.9(g)(1)	Notification of performance evaluation	No.	
§ 63.9(g)(2)	Notification of use of COMS data	No.	

General provisions citation	Subject of citation	Applies to subpart	Explanation
§ 63.9(g)(3)	Notification that criterion for alternative to RATA is exceeded	No.	
§ 63.9(h)(1)-(6)	Notification of compliance status	No.	
§ 63.9(i)	Adjustment of submittal deadlines	Yes.	
§ 63.9(j)	Change in previous information	Yes.	
§ 63.9(k)	Electronic reporting procedures	Yes	Only as specified in § 63.9(i) .
§ 63.10(a)	Administrative provisions for recordkeeping/reporting	Yes.	
§ 63.10(b)(1)	Record retention	Yes.	Except that the most recent 2 years of data do not have to be retained on site.
§ 63.10(b)(2)(i)-(v)	Records related to SSM	No.	
§ 63.10(b)(2)(vi)-(xi)	Records	Yes.	
§ 63.10(b)(2)(xii)	Record when under waiver	Yes.	
§ 63.10(b)(2)(xiii)	Records when using alternative to RATA	Yes.	For CO standard if using RATA alternative.
§ 63.10(b)(2)(xiv)	Records of supporting documentation	Yes.	
§ 63.10(b)(3)	Records of applicability determination	Yes.	
§ 63.10(c)	Additional records for sources using CEMS	Yes.	Except that § 63.10(c)(2)-(4) and (9) are reserved.
§ 63.10(d)(1)	General reporting requirements	Yes.	
§ 63.10(d)(2)	Report of performance test results	Yes.	
§ 63.10(d)(3)	Reporting opacity or VE observations	No.	Subpart ZZZZ does not contain opacity or VE standards.
§ 63.10(d)(4)	Progress reports	Yes.	
§ 63.10(d)(5)	Startup, shutdown, and malfunction reports	No.	
§ 63.10(e)(1) and (2)(i)	Additional CMS Reports	Yes.	
§ 63.10(e)(2)(ii)	COMS-related report	No.	Subpart ZZZZ does not require COMS.
§ 63.10(e)(3)	Excess emission and parameter exceedances reports	Yes.	Except that § 63.10(e)(3)(i) (C) is reserved.
§ 63.10(e)(4)	Reporting COMS data	No.	Subpart ZZZZ does not require COMS.
§ 63.10(f)	Waiver for recordkeeping/reporting	Yes.	
§ 63.11	Flares	No.	
§ 63.12	State authority and delegations	Yes.	
§ 63.13	Addresses	Yes.	
§ 63.14	Incorporation by reference	Yes.	
§ 63.15	Availability of information	Yes.	

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
Emission Unit Recordkeeping		
Maintenance of Water Spray System on Horizontally Fed Grinders	NA	Each Occurrence
Hours of Operation, Fuel Type and Fuel Quantity Used in SC-4	Hours, fuel type, and gallons	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 13	NA	Annually
40 CFR 63 Subpart 4Z Recordkeeping: Records of actions taken during periods of malfunction to minimize emissions	NA	Each occurrence
40 CFR 63 Subpart 4Z Recordkeeping: Records of inspections and maintenance performed according to the manufacturer's or the permittee's maintenance plan	NA	Each occurrence
General Recordkeeping		
Log each complaint from the public and the resolution	NA	Upon receipt
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 23, 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 LRAPA 37-0064(5)(a), issuance of a renewed Simple ACDP requires public notice as a Category III permit action in accordance with LRAPA 31-0030(3)(c), which requires LRAPA to provide notice of the proposed permit action and a minimum of 35 days for interested persons to submit written comments.

The draft permit was on public notice April 24, 2024 to May 30, 2024. One (1) written comment was submitted during the public comment period. No public hearing was requested by ten (10) or more individuals or an individual representing a group of more than ten (10) individuals. A summary of the public comment and LRAPA's response is included in Item 30 of this Review Report.

Public Comment and LRAPA Response

30. One (1) person submitted a set of written comments during the public comment period. The written comment is on file at LRAPA. No changes to the permit were made because of the comments. The comments are summarized as follows:
- **Comment:** The commenter asked how the permit affects the residential use of wood chips on residential properties.
Response: The permit has no bearing on the public's use of wood chips on residential properties. The permit includes conditions that the facility must follow to meet current air quality standards and requirements but does not require any changes or restrictions on residential use of the facility products at their residences.
 - **Comment:** The commenter stated that neighbors and the nearby environment are affected by the air contaminants emitted by the facility, and asked if there is an element of fire suppression.
Response: LRAPA acknowledges that air contaminants emitted by the facility may affect air quality and shares the commenters concern for public health and protection of the natural environment. LRAPA has included all applicable air quality requirements that apply to the facility under the existing regulations that have been adopted with the intent to ensure that no ambient air quality standard may be exceeded by the emissions from the facility. Regarding the commenter's question about fire suppression, LRAPA understands that the facility manages biomass storage piles (e.g., by material movement and mixing) so that fires in those piles are prevented or minimized.
 - **Comment:** The commenter asks if the facility should educate their customers about the above comments when they make deliveries to residential properties and commercial clients. Furthermore, the commenter asks whether there is a policy in that regard.
Response: LRAPA does not have any regulatory authority to require the facility to make efforts to educate the public or their commercial clients about the facility's emissions from activities regulated under the ACDP.

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit		hazardous air pollutants
AQMA	Air Quality Management Area	MM	Million
ACS	Applied coating solids	MMBtu	Million British thermal units
Act	Federal Clean Air Act	MMCF	Million cubic feet
ASTM	American Society of Testing and Materials	NA	Not applicable
		NESHAP	National Emission Standards for Hazardous Air Pollutants
BDT	Bone dry ton		
Btu	British thermal unit	NO _x	Nitrogen oxides
CAM	Compliance Assurance Monitoring	NSPS	New Source Performance Standards
CAO	Cleaner Air Oregon		
CD ID	Control device identifier	NSR	New Source Review
CEMS	Continuous Emissions Monitoring System	O ₂	Oxygen
		OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ODEQ	Oregon Department of Environmental Quality
CI	Compression Ignition		
CMS	Continuous Monitoring System	ORS	Oregon Revised Statutes
CO	Carbon Monoxide	O&M	Operation and maintenance
CO ₂	Carbon dioxide	SB	Lead
CO _{2e}	Carbon dioxide equivalent	PCD	Pollution Control Device
COMS	Continuous Opacity Monitoring System	PM	Particulate matter
		PM _{2.5}	Particulate matter less than 2.5 microns in size
CPDS	Certified Product Data Sheet		
CPMS	Continuous parameter monitoring system	PM ₁₀	Particulate matter less than 10 microns in size
		ppm	Parts per million
DEQ	Department of Environmental Quality	PSEL	Plant Site Emission Limit
dscf	Dry standard cubic feet	psia	pounds per square inch, actual
EF	Emission factor	PTE	Potential to Emit
EPA	US Environmental Protection Agency	QIP	Quality Improvement Plan
		RICE	Reciprocating Internal Combustion Engine
EU	Emissions Unit		
EU ID	Emission unit identifier	SACC	Semi-Annual Compliance Certification
FCAA	Federal Clean Air Act		
ft ²	Square foot	SCEMP	Surrogate Compliance Emissions Monitoring Parameter
FSA	Fuel sampling and analysis		
gal	Gallon	Scf	Standard cubic foot
GHG	Greenhouse Gas	SDS	Safety data sheet
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SER	Significant emission rate
		SERP	Source emissions reduction plan
HAP	Hazardous Air Pollutants as defined by LRAPA title 12	SI	Spark Ignition
		SIC	Standard Industrial Code
HCFC	Halogenated Chlorofluorocarbons	SIP	State Implementation Plan
Hr	Hour	SO ₂	Sulfur dioxide
ICE	Internal Combustion Engine	ST	Source test
ID	Identification number or label	TAC	Toxic air contaminant
I&M	Inspection and maintenance	TACT	Typically Achievable Control Technology
Lb	Pound		
LRAPA	Lane Regional Air Protection Agency	TEU	Toxic Emission Unit
		TPY	Tons per year
MACT	Maximum Achievable Control Technology	VE	Visible emissions
		VMT	Vehicle miles traveled
MBF	Thousand board feet	VOC	Volatile organic compounds
MERV	Minimum efficiency reporting values	Year	A period consisting of any 12-consecutive calendar months
MFHAP	Metal fabrication or finishing metal		

Emission Detail Sheets

Pollutant	Capacity	PSEL	SER
PM	23	20	25
PM10	15	14.4	15
PM2.5	3.9	3.7	10
VOC	39	39	40
NOx	4.4	--	40
CO	0.9	--	100
SO2	0.3	--	40
GHG	223.5	--	75,000
all values are in tons/year			

Engine Criteria Pollutants, Grinding and Screening Emissions

Combustion Emissions from Stationary Engine SC-4

2,500 gallons/yr						
2.5 gallons/hr						
	Max hp	Max BTU	Emission	Capacity	Potential	
	rate total	Input	Factor	Emissions	Emissions	
Pollutant	(hp)	(MMBTU/hr)	(lb/MM BTU)	(tons/yr)	(ton/yr)	
NOx	90	0.2	4.41	4.4	0.8	
CO	90	0.2	0.95	0.9	0.2	
SO2	90	0.2	0.29	0.3	0.1	
PM/PM10	90	0.2	0.31	0.3	0.1	
PM2.5	90	0.2	0.26	0.3	0.0	
VOC	90	0.2	0.36	0.4	0.1	
GHG (CO2e)				223.5	25.6	

The facility has one (1) diesel-fired screen each rated at 89.7 Hp.
 The power conversion factor used is 1hp = 2,544 Btu/hr (not 7000 btu/hr stated in AP42 3.3-1.)
 Emission factors are from AP-42 Table 3.3-1, Emission Factors for Uncontrolled Diesel Engines
 PM2.5 fraction of PM10 is 89% from DEQ AQEF-08 (assume similar to No.2 oil-fired commercial boiler)
 GHG emissions are calculated using DEQ's Fuel Combustion GHG Calculator
 Maximum potential emissions evaluated assuming 24 hrs/day x 365 days/yr of engine operation
 Maximum allowable emissions are limited by the 120,000 gallon/year fuel oil combustion limit in the permit
 All other engines are considered non-road since they do not remain on site for greater than 12 months each year

Grinding Emissions

Total annual material throughput (tons/yr) =		250,000
	Emission	Total Annual
	Factor	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 Emissions

Total annual material throughput (tons/yr) =		250,000
	Emission	Total Annual
	Factor	Emissions
Pollutant	(lb/ton)	(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.
 Emission factor from EPA AP42 Table 11.19.2-2 for Screening
 Assum fore estimation purposes that crushed stone screening is and representative of emissions from wood screening.
 Capacity emissions were not attempted to be estimated for screening

Storage Piles and Material Handling						
Biomass (bark, mulch and bedding, soils, shavings, chips, soils, potting mixes, and compost, etc.)						
Material Volume (tpy)	175,000					
Biomass Particulate						
Drop Points (#)	20					
		EF (lb/ton)	Biomass Piles PM (lb/year)	Biomass Drop Pt PM (lb/year)		
	PM	4.05E-05	7.1	142		
	PM10	1.91E-05	3.4	67		
	PM2.5	2.90E-06	0.5	10		
	k (PM)	0.74				
	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/ClimateBookEugene			
	u					
Biomass 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				
	% of Total "Biomass" Production				VOC as C	
Garden Compost	35.7%	62475 tons/yr		0.5 Moisture	22491	
Chips	0.5%	875 tons/yr		0.45 Moisture	346.5	
Hogged Fuel	45.5%	79625 tons/yr		0.5 Moisture	28665	
	5%	8750 tons/yr		0.4 Moisture	3780	
Sawdust	3.3%	5775 tons/yr		0.45 Moisture	2287	
Bark	9.9%	17325 tons/yr		0.45 Moisture	6861	
TOTAL	100%	174825 tons/yr	Total	lb/yr	64430.1	32.2 ton/yr
A rough conversion for VOC as Carbon to Actual VOC is 1.22*(VOC as C): Actual VOC:						39.3 ton/yr

Rock (bulk rock and gravel, loam, sand, cinder, pumice, decomposed granite - excludes paving stones, etc.)				
Material Volume (tpy)	75,000			
Drop Points (#)	20			
		EF (lb/ton)	Rock Piles PM (lb/year)	Rock Drop Pts (lb/year)
	PM	1.59E-02	1196	23919
	PM10	7.54E-03	566	11313
	PM2.5	1.14E-03	86	1713
	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	
		Piles	Handling	
		Tons/year	Tons/year	
TOTAL				
	PM	0.6	12.0	
	PM10	6.0	5.7	
	PM2.5	0.9	0.9	
	VOC	39.3		
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			
	The potential to emit (PTE) for VOC was established at 39 tpy and then a storage pile throughput was determined that matched the PTE			

Engine (SC-4) HAPs and TACs					
Fuel Limitation: 2,500 gallons/year diesel combustion					
EU- SC-4	CAS No/DEQ ID	Pollutant	EF	Units	Emissions (lbs/year)
Engine SC-4	71-43-2	Benzene	0.1863	lb/M gal	0.47
Engine SC-4	106-99-0	1,3-Butadiene	0.2174	lb/M gal	0.54
Engine SC-4	7440-43-9	Cadmium and compounds	0.0015	lb/M gal	0.00
Engine SC-4	50-00-0	Formaldehyde	1.7261	lb/M gal	4.32
Engine SC-4	18540-29-9	Chromium VI, chromate and dichromate	0.0001	lb/M gal	0.00
Engine SC-4	7440-38-2	Arsenic and compounds	0.0016	lb/M gal	0.00
Engine SC-4	7439-92-1	Lead and compounds	0.0083	lb/M gal	0.02
Engine SC-4	365	Nickel compounds, insoluble	0.0039	lb/M gal	0.01
Engine SC-4	91-20-3	Naphthalene	0.0197	lb/M gal	0.05
Engine SC-4	401	Polycyclic aromatic hydrocarbons (PAH)	0.0362	lb/M gal	0.09
Engine SC-4	75-07-0	Acetaldehyde	0.7833	lb/M gal	1.96
Engine SC-4	107-02-8	Acrolein	0.0339	lb/M gal	0.08
Engine SC-4	7664-41-7	Ammonia	2.9	lb/M gal	7.25
Engine SC-4	7440-50-8	Copper and compounds	0.0041	lb/M gal	0.01
Engine SC-4	100-41-4	Ethyl benzene	0.0109	lb/M gal	0.03
Engine SC-4	110-54-3	Hexane	0.0269	lb/M gal	0.07
Engine SC-4	7647-01-0	Hydrochloric acid	0.1863	lb/M gal	0.47
Engine SC-4	7439-96-5	Manganese and compounds	0.0031	lb/M gal	0.01
Engine SC-4	7439-97-6	Mercury and compounds	0.002	lb/M gal	0.01
Engine SC-4	7782-49-2	Selenium and compounds	0.0022	lb/M gal	0.01
Engine SC-4	108-88-3	Toluene	0.1054	lb/M gal	0.26
Engine SC-4	1330-20-7	Xylene (mixture), including m-xylene, o-xylene, and p-xylene	0.0424	lb/M gal	0.11
Engine SC-4	200	Diesel particulate matter	33.5	lb/M gal	83.75
		TOTAL			99.50 lb/year
		FHAPs			8.40 lb/year

Emission factors (EFs) are the same as those used in the facility's 2020 Air Toxics Emissions Inventory (ATEI), except:
 The emissions in these detail sheets are based upon the 120,000 gallon/year fuel oil combustion limit in the permit

EF Reference: South Coast Air Quality Management District - SCAQMD AB2588 B-2

FHAPs = federal HAPs and excludes PAHs, ammonia, copper, and diesel PM

TAC = toxic air contaminant under Oregon Cleaner Air Oregon