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

STANDARD AIR CONTAMINANT DISCHARGE PERMIT (STANDARD ACDP)

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

Issued To:
Timberlab Laminators, LLC
P.O. Box 297
Drain, OR 97435

Plant Site Location:
Diversified Wood Resources, LLC
12796 Highway 36
Swisshome, OR 97480

Permit Number: 200021
Permit Type: Simple
Primary SIC: 2439 – Structural Wood Members, NEC
Secondary SIC: 4961 – Steam and Air-Conditioning Supply
Date Issued: August 22, 2022
Expiration Date: August 22, 2027
Modification Date: June 27, 2024

Information Relied Upon:
Application Number: 70363
Date Received: May 24, 2024

Land Use Compatibility Statement:
From: Lane County
Date: January 11, 2011

Travis Knudsen, Executive Director

6/27/24
Effective Date

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

Title 37 Table 1 Code	Source Description
Part B: 45	Millwork manufacturing, including kitchen cabinets and structural wood members, 25,000 or more board feet/maximum 8 hour input
Part B: 12	Boilers and other fuel burning equipment over 10 MMBTU/hour heat input

Addendum No. 1
Non-Technical Permit Modification

In accordance with subparagraph 37-0066(4)(b)(A), Standard Air Contaminant Discharge Permit (ACDP) No. 200021 is hereby amended to change the legal name of the facility in accordance with title 37 of LRAPA's Rules and Regulations.

Page 1 of Standard ACDP No. 200021 has been amended as follows: The section "Issued To:" now reads as Timberlab Laminators, LLC, P.O. Box 297, Drain, OR 97435 instead of Diversified Wood Resources, LLC, 12796 Highway 36, Swisshome, OR 97480. The section "Plant Site Location:" now reads as Diversified Wood Resources, LLC, instead of American Laminators.

JJW:AA
06/26/2024

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

STANDARD AIR CONTAMINANT DISCHARGE PERMIT (ACDP)

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

Issued To:
Diversified Wood Resources, LLC
12796 Highway 36
Swisshome, Oregon 97480

Information Relied Upon:
Application No: 65762
Date: January 10, 2020
Revised Application No.: 68451
Date: June 10, 2022

Plant Site Location:
dba American Laminators
12796 Highway 36
Swisshome, Oregon 97480

Land Use Compatibility Statement:
Approving Authority: Lane County
Date: January 11, 2011

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich

Steven A. Dietrich, Director — August 22, 2022 Dated

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

Table 1 Code	Source Description	SIC	NAICS#
Part B, 45	Millwork Mfg. including kitchen cabinets and structural wood members 25,000 or more bd.ft./maximum 8-hour finished product	2439	321213
Part B, 12	Fuel Burning Equipment >10 MMBtu/hr heat input	4961	22130

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

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

Emission Unit (EU) Description	EU ID	Pollution Control Device (PCD) Description	PCD ID
Wood Machining Equipment	EU-Millwork	Cyclone	EQ-1
Planing Mill Equipment	EU-Millwork	Cyclone	EQ-3
Millwork Adhesive: Face & Finger Joint Applications	EU-Millwork-Adhesives	None	NA
Five (5) Dry Kilns	EU-Kilns	None	NA
Two (2) wood-fired boilers: Boiler 1 and Boiler 2	EU-Boilers: EQ-04 Boiler #1 & EQ-05 Boiler #2	Multiclone and wet scrubber system	Multiclone & Scrubber

2.0 GENERAL EMISSION STANDARDS AND LIMITS

2.1. Visible Emissions

The permittee must comply with the following visible emission limits from air contaminant sources other than fugitive emission sources. For all visible emission standards in this section, the minimum observation period must be six-minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g. three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 203B reading represents 15 seconds of time. Three-minute aggregate periods are measured by: EPA Method 203B; A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or an alternative monitoring method approved by LRAPA that is equivalent to EPA Method 203B : [LRAPA 32-010(2)(a-c)]

a. Emissions from air contaminant sources (**EU-Millwork Cyclones EQ-1 and EQ-2**), other than the wood-fired boilers (**EU-Boilers 1 & 2)**, the permittee must not cause 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 minutes in any one hour. [LRAPA 32-010(3)]

2.2. Fugitive Emissions

The permittee must not cause, suffer, allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but are not limited to the following: [LRAPA 48-015(1)(a) through (g)]

a. Use, where possible, water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
b. Application of water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
c. Full or partial enclosure of materials stockpiles in cases where application of water or other suitable chemicals are not sufficient to prevent particulate matter from becoming airborne;

d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
e. Adequate containment during sandblasting or other similar operations;
f. Covering, at all times when in motion, open-bodied trucks transporting materials likely to become airborne;
g. The prompt removal from paved streets of earth or other material which does or may become airborne.

For purposes of Condition 2.2, fugitive dust emissions are visible emissions that leave the property of the permittee for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured by EPA Method 22 at the downwind property boundary and the minimum observation time must be at least six minutes unless otherwise specified in this permit. [LRAPA 48-15(2)(a) & (b)]

2.3. Particulate Matter Emissions

The permittee must comply with the following particulate matter emission limits, as applicable:

a. For sources, other than fuel-burning equipment, refuse-burning equipment and fugitive emissions, the permittee must not cause, suffer, allow or permit particulate matter emissions from any air contaminant source installed, constructed or modified after June 1,1970 but prior to April 16, 2015, (**Cyclones EQ-1 & EQ-3**) and for which there are no representative compliance source test results, to exceed 0.14 grains per dry standard cubic foot (gr/dscf). [LRAPA 32-015(2)(b)(B)]

b. The permittee must not cause, suffer allow, or permit the emission of particulate matter in any one hour from any process in excess of the amount shown in 32-8010, for the process weight allocated to such process. [LRAPA 32-045(1) and 32-8010]

2.4. Particulate Matter Fallout

The permittee must not cause or permit the emission of particulate matter larger than 250 microns in size at such a duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

2.5. Nuisance and Odors

The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions may be verified by LRAPA personnel. The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include the date of contact, time of observed nuisance condition, location at the facility and nature of the complainant's concern. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and provide a response to the complainant within 24 hours, if possible. [LRAPA 49-010 and 32-005]

3.0 SPECIFIC PERFORMANCE AND EMISSION STANDARDS

3.1. Lumber Kiln Operating Temperatures

To ensure that overall HAP emissions from the dry kilns remain at the lowest extent possible, the permittee must limit the maximum temperature in each kiln to no more than 200 degrees Fahrenheit (200ºF). [LRAPA 32-007 and 42-0080]

a. The permittee must certify in the annual report required by Condition 9.2 that the dry kilns did not operate above 200ºF at any time during any 12-month rolling period for that reporting period.

3.2. Hazardous Air Pollutants (HAPs)

Total HAPs from this source must not exceed 9 tons/year for any single HAP and 24 tons/year of total combination of HAPs during any consecutive 12-month period. [LRAPA 42-0060]

a. To ensure compliance with Condition 3.2, the emissions of hazardous air pollutants (HAPs) must be calculated in accordance with Condition 6.2 for each rolling 12-month period using records of HAP-containing material usage in accordance with Condition 6.1.b.

3.3. Boilers

a. For fuel-burning equipment sources installed, constructed or modified after June 1,1970 but prior to April 16, 2015 (**EU-Boilers 1 & 2**), and for which there are no representative compliance source test results, the permittee must not cause, suffer, allow or permit particulate matter emissions to exceed 0.14 grains per dry standard cubic foot (gr/dscf). [LRAPA 32-030(1)(b)]

b. For wood-fired boilers installed, constructed or modified after June 1,1970 but prior to April 16, 2015 (**EU-Boilers 1 & 2**), the permittee must not cause 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 minutes in any one hour. [LRAPA 32-010(5)]

c. The permittee must conduct grate cleaning of the wood or biomass boilers (**EU-Boilers 1 & 2**) and keep a log of each grate cleaning performed that includes the date, time and duration of each grate-cleaning in accordance with the LRAPA-approved grate-cleaning plan. The approved plan must be kept onsite and be made available upon request and includes the following: [LRAPA 32-007]

   i. Expected frequency of grate cleaning;

   ii. Expected length of grate cleaning period; and

   iii. Methods to minimize emissions during grate cleaning.

d. **EU-Boilers Fuel Limitations**: The fuel for EU-Boilers must be biomass supply limited to: [LRAPA 32-007(1)(a), 40 CFR 63.11237 and 40 CFR 241.3]

   i. Biomass means any biomass-based solid fuel that is not a solid waste. This includes, but is not limited to, wood residue and wood products (e.g., trees, tree stumps, tree limbs, bark, lumber, sawdust, chips, scraps, slabs, millings, and shavings); animal manure, including litter and other bedding materials; vegetative agricultural and silvicultural materials, such as grain hulls and chaff (e.g., almond, walnut, peanut, rice, and wheat), bagasse, orchard prunings, corn stalks, coffee bean hulls, and grounds. This definition of biomass is not intended to suggest that these materials are or are not solid waste;

   ii. No chemically treated wood products including painted or oil-stained material, or preservative treated wood;

   iii. No fossil fuel may be combusted in either Boiler #1 or Boiler#2;

   iv. In no event may sanderdust be a source of fuel for any boiler in EU-Boilers (Boiler #1 & #2).

Area Source Boiler National Emission Standard for Hazardous Air Pollutants (NESHAP) (40 CFR 63 Subpart JJJJJJ):

e. **Applicability and Fuel Limitation:** The requirements of 40 CFR Part 63, Subpart JJJJJJ ("NESHAP 6J") are incorporated by reference, as applicable. The NESHAP/MACT Standard for Industrial, Commercial and Institutional Boilers – Boiler Area Source MACT applies to each boiler in EU-Boilers because each boiler combusts biomass. The permittee may only burn wood biomass that has not been discarded and meets the legitimacy criteria specified in paragraph 40 CFR 241.3(d)(1). Biomass means any biomass-based solid fuel that is not a solid waste as defined in paragraph 40 CFR 241.3 and Condition 3.3.d.i, as applicable. [40 CFR 63.11196(c)]

f. **Limited-use Boiler (Boiler #1):** operation must be limited to no more than 876 hours/year. [40 CFR 63.11195 and 63.11237 (definition of "limited-use boiler")]

g. **Boiler Tune-Up Requirements (Boiler #2):** Except as specified in 40 CFR 63.11223(c) through (f), the permittee must conduct an initial tune-up of Boiler #2 no later than March 21, 2014 and biennially thereafter to demonstrate continuous compliance as specified in Conditions

3.3.g.i through 3.3.g.vi below (40 CFR 63.11223(b)(1) through (b)(7)). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. [40 CFR 63.11223(b)]

i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection. [40 CFR 63.11223(b)(1)]

ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. Any adjustment should be consistent with the manufacturer's specifications, if available. [40 CFR 63.11223(b)(2)]

iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the inspection until the first outage, not to exceed 36 months from the previous inspection. [40 CFR 63.11223(b)(3)]

iv. Optimize total emissions of carbon monoxide (CO). The optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide (NO_X) requirement to which the unit is subject. [40 CFR 63.11223(b)(4)]

v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR 63.11223(b)(5)]

vi. Maintain on-site and submit, if requested by LRAPA, a report containing the information in paragraphs below: [40 CFR 63.11223(b)(6)]

A. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.
B. A description of any corrective actions taken as a part of the tune-up of the boiler.
C. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the boiler was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

vii. If the boiler (**Boiler #2)** is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [40 CFR 63.11223(b)(7)]

h. **NESHAP 6J Notification Requirements:** The permittee must submit the notifications to LRAPA specified in Conditions 3.3.h.i and 3.3.h.ii., below:

i. The permittee must submit all of the notifications in 40 CFR 63.7(b); 63.8(e) and (f); and 63.9(b) through (e), (g) and (h) that apply to the source by the dates specified in Condition 3.3.h.ii, below: [40 CFR 63.11225(a)]

ii. The permittee must submit the **Initial** Notification of Compliance Status no later than July 19, 2014. The Notification of Compliance Status must include the information and certification(s) of compliance in Conditions 3.3.h.ii A through C, as applicable, and signed by a responsible official. [40 CFR 63.11225(a)(2)]

A. "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler."
B. For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
C. The notification must be submitted electronically using the Compliance and Emissions Data Reporting Interface (CEDRI) that is accessed through EPA's Central Data Exchange (CDX) (*http://www.epa.gov/cdx/*). However, if the reporting form specific to this subpart is not available in CEDRI at the time that the report is due, the written

Notification of Compliance Status must be submitted to the administrator at the appropriate address listed in 40 CFR 63.13.

j. **Biennial Compliance Certification Report:** The permittee must prepare, by March 1 of each year, and submit to LRAPA upon request, a biennial compliance report as specified in Conditions 3.3.j.i and 3.3.j.ii: [40 CFR 63.11225(b)]

i. Company name and address. [40 CFR 63.11225(b)(1)]

ii. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of this subpart. The permittee notification must include the following certification(s) of compliance, as applicable, and signed by the responsible official: [40 CFR 63.11225(b)(2)]

A. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up for the boiler." [40 CFR 63.11225(b)(2)(i)]

B. For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in the any affected unit (Boiler #2)." [40 CFR 63.11225(b)(2)(ii)]

k. **NESHAP 6J Recordkeeping Requirement:** The permittee must maintain the records specified in the Conditions 3.3.k.i. and 3.3.k.ii., below: [40 CFR 63.11225(c)]

i. As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report that the permittee submitted to comply with this subpart and all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted. [40 CFR 63.11225(c)(1)]

ii. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices required by 40 CFR 63.11214 and 63.11223 as specified in Conditions 3.3.k.ii A and 3.3.k.ii.B [40 CFR 63.11225(c)(2)]

A. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [40 CFR 63.11225(c)(2)(i)]

B. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c), the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operation units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, the permittee must keep records documenting that the materials are listed as non-waste under 40 CFR 241.4(a). [40 CFR 63.11225(c)(2)(ii)]

iii. The permittee's records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. [40 CFR 63.11225(d)]

4.0 OPERATION AND MAINTENANCE REQUIREMENTS

4.1. Operational and Work Practice Requirements [LRAPA 32-007]

a. Within 3 months of permit issuance, the permittee must install a boiler feedwater meter and data recorder on Boiler #2.

b. The permittee must monitor the EU-Boilers water usage (boiler feedwater meter flow rate) and steaming rate for each day Boiler #2 is operated. The permittee must maintain the following records for each day Boiler #2 is operated:
   i. Date, time and feedwater meter reading (in gallons) for each day of startup of Boiler #2;
   ii. Date, time and feedwater meter reading (in gallons) for each day of shutdown of Boiler #2;
   iii. Total daily Boiler #2 feedwater usage (in gallons (feedwater meter shutdown reading minus startup reading)) and the daily steaming rate in pounds of steam/day (calculated by multiplying the total daily gallons of water usage times 8.345 lbs steam/gallon of water used);
   iv. Total daily hours of operation of Boiler #2;

c. As required by NESHAP 6J, the permittee must perform a tune-up of Boiler #2 biennially (once every 2 years) in accordance with Condition 3.3.g, notify LRAPA of Boiler #2 compliance status in accordance with Condition 3.3.h., and maintain records of Boiler #2 operations in accordance with Condition 3.3.k.

d. Monitor and record Boiler #2 scrubber water flow (gpm) and pressure differential readings (p.s.i) both prefilter & post filter for each day Boiler #2 is in operation and inspect Boiler #2 scrubber nozzles once per month.

e. Record all incidents of maintenance performed on the EU-Boilers, the boiler wet scrubber and the boiler multiclone.

4.2. Operation of Pollution Control Devices and Processes

The permittee must operate and ensure proper functioning of all air pollution control devices and components at all times when the associated emission source is operating. [LRAPA 32-007]

4.3. Highest and Best Practicable Treatment and Control

The permittee must provide the highest and best practicable treatment and control of air contaminant emissions in every case so as to maintain overall air quality at the highest possible levels, and to maintain contaminant concentrations, visibility reduction, odors, soiling and other deleterious factors at the lowest possible levels. [LRAPA 32-005]

4.4. Grate Cleaning Plan

In accordance with Condition 3.3.c., the permittee must maintain a log of grate cleaning that includes the date and length of time of grate cleaning. The log must be kept onsite and be made available to LRAPA upon request. [LRAPA 32-007]

5.0 PLANT SITE EMISSION LIMITS

5.1. Plant Site Emission Limits (PSEL)

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

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

Source	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_x	CO	VOC	GHG (CO2e)	Single HAP	Total HAPs
Total Plant Site	24	14	9	39	39	99	39	74,000	9	24

5.2. PSEL Monitoring and Compliance

The annual plant site emissions limits apply to any 12-consecutive calendar month period. **By the 15th working day of each month**, the permittee must determine compliance with the Plant Site Emission Limits in Condition 5.1, above, by monitoring and maintaining the records required by Condition 6.1.b and calculating a new 12-month rolling total for each pollutant, except for GHGs (for GHG emissions see Condition 6.6), in accordance with Conditions 6.2, 6.4 and 6.5. [LRAPA 34-016, 42-0080(4)(c)]

6.0 MONITORING & RECORDKEEPING REQUIREMENTS

6.1. Monitoring & Recordkeeping Requirements

The permittee must monitor the operation and maintenance of the facility and associated air contaminant control devices and maintain records as follows: [LRAPA 34-016, 42-0080(4)(c)]

a. Upset conditions or breakdown of equipment or air pollution control devices (EU-Boilers Multiclone and Scrubber System) which may result in exceeding the emission limitations specified in this permit must be recorded and reported to LRAPA as soon as possible in accordance with Conditions G19 - G21.[LRAPA Title 36 – Excess Emissions]

b. The permittee must monitor and maintain records of the following information at the plant site for a period of five (5) years following the date of data entry. Records must be available for inspection by authorized representatives of LRAPA. All totals for items A, B, D, H, J, K, P, Q, and R must be 12-month rolling totals: [LRAPA 34-016 and 40 CFR 63, Subpart 6J]

Item	Emission Source, Unit Device or Activity (EU-ID#)	Permit Condition #	Process, Parameter or Production (units)	Minimum Monitoring & Recording Frequency
A	Facility-Wide Annual (rolling 12-consectutive calendar months) PSEL	6.2	Rolling 12-month PSEL(tons/yr) Compliance Demonstration	By the 15th of each Month
B	EU-Boilers Steam Produced	4.1.a	Pounds steam/hour and pounds steam/day	Per day of Boiler operation
C	EU-Boilers Total Gallons of Boiler # 2 Feedwater used	4.1.a	Gallons of Boiler #2 Feedwater	Per day of Boiler operation
D	EU-Boilers Hours of operation of Boiler#2	4.1.a	Total Hours of operation of Boiler #2	Per day of Boiler operation

Item	Emission Source, Unit Device or Activity (EU-ID#)	Permit Condition #	Process, Parameter or Production (units)	Minimum Monitoring & Recording Frequency
E	EU-Boilers NESHAP 6J Tune-Ups for Boiler #2	3.3.g & 4.1.c	Boiler Tune-up Report and Compliance Certification	Biennially
F	EU-Boilers Wet Scrubber	4.1.d	Water flow (gpm) and pressure differential reading (psi) both pre & post filter per day of operation of Boiler #2	Per day of Boiler operation
G	EU-Boilers, Wet Scrubber and Multiclone System	4.1.e	Dates of Inspection & Maintenance	Monthly when boilers are operating
H	EU-Millwork Cyclones (2): EQ-1 and EQ-3	6.2	Bone Dry Tons (BDT)/month	Monthly
J	Operating hours of the Laminating Plant (EU-Millwork – Adhesives)	6.2	Hours of operation per day	Daily
K	EU-Millwork-Adhesives: All VOC/HAP containing materials usage: adhesives, paints, etc.	3.2.a, 6.2, 6.4	Gallons or pounds	Monthly
L	VOC/HAP containing materials density	3.2.a, 6.2, 6.4	Pounds/gallon	Maintain current information (SDS) at all times
M	VOC-containing materials usage	3.2.a, 6.2, 6.4	% VOC by weight	Maintain current information (SDS) at all times
N	HAP-containing materials usage	3.2.a, 6.2, 6.4	% by weight for each HAP	Maintain current information (SDS) at all times
P	Lam Face Adhesives & Hardeners	3.2.a, 6.2, 6.4	Pounds used/month	Monthly
Q	Finger-Joint Adhesives & Hardeners	3.2.a, 6.2, 6.4	Pounds used/month	Monthly
R	Lumber Dried in EU-Kilns by species	6.2	MBF Doug Fir/month MBF Cedar/month	Monthly
S	Max EU-Kilns Drying Temperature	3.1.a, 6.2	Max Drying Temperature (ºF) per EU-Kiln charge	Twice per Kiln Charge

6.2. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the PSEL for each 12-consecutive calendar month period based on the following calculation for each pollutant except GHGs: [LRAPA 34-016, 42-0080(4)(c)]

$$E = \Sigma(EF \times P) \times 1 \text{ ton}/2000 \text{ pounds}$$

where:

E = pollutant emissions (tons/yr);

Σ = symbol representing “summation of”

EF = pollutant emission factor (see Condition 6.3);

P = process production (see Condition 6.1.b)

6.3. Emission Factors

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

Emission Unit, Device or Activity	Pollutant	Emission Factor (EF)	EF Units	Testing Requirement Y/N
EU-Boilers	PM	0.168	Lbs/M lbs steam	**Y** see Condition 7.2
	PM	0.14	Lbs/MMBtu	**Y** see Condition 7.2
	PM_{10}	0.084	Lbs/M lbs steam	**N**
	PM_{10}	0.070	Lbs/MMBtu	**N**
	$PM_{2.5}$	0.084	Lbs/M lbs steam	**N**
	$PM_{2.5}$	0.070	Lbs/MMBtu	**N**
	SO_2	0.014	Lbs/M lbs steam	**N**
	SO_2	0.012	Lbs/MMBtu	**N**
	NO_x	0.31	Lbs/M lbs steam	**Y** see Condition 7.2
	NO_x	0.26	Lbs/MMBtu	**Y** see Condition 7.2
	CO	3.0	Lbs/M lbs steam	**Y** see Condition 7.2
	CO	2.5	Lbs/MMBtu	**Y** see Condition 7.2
	VOC	0.13	Lbs/M lbs steam	**N**
	VOC	0.11	Lbs/MMBtu	**N**
	Single HAP: Formaldehyde	0.00122	Lbs/M lbs steam	**N**
	Single HAP: Formaldehyde	0.00102	Lbs/MMBtu	**N**
	Total HAP	0.00943	Lbs/M lbs steam	**N**
	Total HAP	0.00786	Lbs/MMBtu	**N**
EU-Millwork Cyclones (EQ-1, EQ-3)	PM	0.5	Lbs/BDT	**N**
	PM_{10}	0.425	Lbs/BDT	**N**
	$PM_{2.5}$	0.250	Lbs/BDT	**N**
EU-Millwork Adhesives: Brown Face Adhesive & Hardener Mix	VOC	0.0016	Lbs/gallon adhesive applied	**N**
	Single HAP: Methanol	0.0006	Lbs/gallon adhesive applied	**N**
	Total HAP	0.0012	Lbs/gallon adhesive applied	**N**
EU-Millwork Adhesives: White	VOC	0.0066	Lbs/gallon adhesive applied	**N**

Emission Unit, Device or Activity	Pollutant	Emission Factor (EF)	EF Units	Testing Requirement Y/N
Face Adhesive & Hardener Mix	Single HAP: Methanol	0.0056	Lbs/gallon adhesive applied	**N**
	Total HAP	0.0058	Lbs/gallon adhesive applied	**N**
EU-Millwork Adhesives: Finger-Joint Adhesive & Hardener Mix	VOC	0.00891	Lbs/gallon adhesive applied	**N**
	Single HAP: Methanol	0.00773	Lbs/gallon adhesive applied	**N**
	Total HAP	0.0078	Lbs/gallon adhesive applied	**N**
EU-Kilns	$PM/PM_{10}/PM_{2.5}$	0.02	Lbs/MBF Doug Fir	**N**
	$VOC_{as\ propane}$	1.116	Lbs/MBF Doug Fir	**N**
	Single HAP: Methanol	0.0754	Lbs/MBF Doug Fir	**N**
	Total HAP	0.1226	Lbs/MBF Doug Fir	**N**
	$PM/PM_{10}/PM_{2.5}$	0.05	Lbs/MBF Cedar	**N**
	$VOC_{as\ propane}$	0.7611	Lbs/MBF Cedar	**N**
	Single HAP: Methanol	0.2295	Lbs/MBF Cedar	**N**
	Total HAP	0.2918	Lbs/MBF Cedar	**N**

6.4. PSEL Compliance Monitoring using Mass Balance without controls

The permittee must calculate the annual VOC PSEL for each 12 consecutive calendar month period based on the following formula: [LRAPA 34-016, 42-0080(4)(c)]

E_{VOC-A} = $[\sum(C_x \times D_x \times K_x) - W] \times 1$ ton/2000 pounds

where:

E_{VOC-A}	=	Annual VOC emissions in tons
Σ	=	Symbol representing "summation of"
C	=	Material usage for the period in gallons
D	=	Material density in pounds per gallon
K	=	VOC concentration in pounds of VOC per pound of material, expressed as a decimal
x	=	Subscript x represents a specific material
W	=	Weight of VOC shipped offsite in pounds

6.5. Facility-Wide PSEL Compliance Monitoring

The permittee must demonstrate compliance with the PSEL by **totaling** the emissions from all emission sources calculated under Conditions 6.2 (using EF in Condition 6.3) and 6.4. [LRAPA 34-016, 42-0080(4)(c)]

6.6. Monitoring of Greenhouse Gas (GHGs) Emissions

Per OAR 340-215-0034(1)(b), the permittee must retain records required under OAR 340-215-0042 for a period of five years following the year that they were last subject to reporting. In the event that CO_2e emissions from the facility become subject to reporting (exceed 2500 MT CO_2e/year), the permittee must resume reporting and must calculate greenhouse gas emissions to determine compliance with the GHG PSEL by using the following: [OAR340 division 215, LRAPA 34-016, 42-0080(4)(c)]

a. DEQ Fuel Combustion Greenhouse Gas Calculator: https://www.oregon.gov/deq/FilterDocs/ghgCalculatorFuelCombust.xlsx; and

b. EPA emission quantification methodologies as prescribed in 40 CFR Part 98 subparts A and C https://ccdsupport.com/confluence/display/help/Optional+Calculation+Spreadsheet+Instructions

7.0 SOURCE TESTING

7.1. Boiler #2 PM Compliance Source Testing Requirements

Within eighteen months of permit issuance, the permittee must demonstrate that Boiler #2 of EU-Boilers is capable of operating at its normal maximum operating rate in compliance with the particulate emission grain loading limits specified in Condition 3.3.a. by conducting a source test for particulate matter emissions at the compliance demonstration point of Boiler #2 (Scrubber Exhaust Stack (EP-03) after the scrubber) of EU-Boilers using the following test methods and procedures: [LRAPA 35-0120, 35-0140]

a. Oregon DEQ Method 5 and EPA Methods 1 through 4 must be used for measuring particulate matter emissions from Boiler #2.

   i. Each test run must be a minimum of 60 minutes long with a sample volume of 31.8 dscf.

   ii. Test results must be reported as grains per dry standard cubic feet (dscf), gr/dscf corrected to 12% CO_2, pounds per hour (lbs/hr), pounds per thousand pounds of steam produced (lbs/Mlbs steam) and pounds per MMBtu of steam produced (using the conversion factor of 1.2 MMBtu per Mlbs steam).

b. Unless otherwise specified in an LRAPA-approved source test plan, the particulate matter compliance tests must be conducted while Boiler #2 is operating at a level that equals or exceeds ninety-percent 90% of the normal maximum rate. The normal maximum operating rate is defined as the 90th percentile of the average hourly rates during the 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate, based on Boiler #2 steam production records from the 12-month period prior to the source test, must be monitored and recorded as required by Conditions 4.1.a and 6.1.b (Items B, C, & D) and included with the source test report.

c. During each test run, the permittee must monitor and record the following parameters:
   i. Visible emissions (VE) as measured by Modified Method 9 within 30 minutes before, during or after each test run, unless weather conditions are such that it is not possible to read opacity;
   ii. Boiler #2 steaming rate as calculated from Boiler #2 feedwater meter readings (in gallons/hr) in accordance with Conditions 4.1.a and 6.1.b (Items B, C, & D);
   iii. Boiler #2 excess oxygen (%);
   iv. Scrubber water flow (gpm) and pressure differential readings (p.s.i) both prefilter & post filter;
   v. As-fired fuel characteristics including moisture content, approximate percentage of wood shavings and fines, species, and percent by weight less than 1/8 inch; and
   vi. Estimated total weight (in BDT) of biomass fuel combusted during the test run.

d. All tests must be conducted in accordance with ODEQ Source Sampling Manual and the LRAPA-approved source test plan. The source test plan must be submitted at least **30 days** prior to the date of the test and be approved by the LRAPA Source Test Coordinator. A report which includes the test data and results must be submitted to LRAPA for review within **60 days** of the test unless otherwise approved in the source test plan or an alternate submittal date is approved by LRAPA.

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

7.2. Boiler #2 PSEL Emission Factor Verification Testing: PM, NOx & CO

Within eighteen months of permit issuance, the permittee must verify the permit emission factors for PM, NO_x and CO, specified in Condition 6.3 for Boiler #2 of EU-Boilers while operating at its normal maximum operating rate, by conducting source tests for PM, NO_x and CO emissions at the compliance demonstration point of Boiler #2 (Scrubber Exhaust Stack (EP-03)) of EU-Boilers using the following test methods and procedures: [LRAPA 35-0120, 35-0140]

a. Oregon DEQ Method 5 and EPA Methods 1 through 4 must be used for measuring PM emissions from Boiler #2. The test must consist of three (3) test runs and each test run must be a minimum of 60 minutes long with a minimum sample volume of 31.8 scf. Test results must be reported as grains per dry standard cubic foot (gr/dscf), pounds per 1000 pounds of steam (M lbs steam) produced and pounds per MMBtu of steam produced (using the conversion factor of 1.2 MMBtu per Mlbs steam). PM compliance testing results in Condition 7.1 may be used to satisfy the EF verification testing.

b. EPA Method 7E and EPA Methods 1 through 4 must be used for measuring NO_x emissions from Boiler #2. The test must consist of three (3) test runs and each test run must be a minimum of 60 minutes long. Test results must be reported in parts per million (ppm), ppm corrected to 12% CO_2, pounds of NO_x per hour, pounds of NO_x per 1000 pounds of steam produced and pounds per MMBtu of steam produced (using the conversion factor of 1.2 MMBtu per Mlbs steam); and

c. EPA Method 10 and EPA Methods 1 through 4 must be used for measuring CO emissions from Boiler #2. The test must consist of three (3) test runs and each test run must be a minimum of 60 minutes long. Test results must be reported in parts per million (ppm), ppm corrected to 12% CO_2, pounds of CO per hour, pounds of CO per 1000 pounds of steam produced and pounds per MMBtu of steam produced (using the conversion factor of 1.2 MMBtu per Mlbs steam).

d. EPA Method 19 must be used to analyze representative hogged-fuel composite samples concurrent with the emission factor verification source testing specified in Conditions 7.2.a through 7.2.c., above. The permittee must perform Gross Sample Analyses on the composite wood fuel samples using the associated test methods as follows:

i. ASTM D2013-72 or 86 to prepare the composite sample;

ii. ASTM D3173-73 or 87 to determine Fuel Moisture Content (% wet basis) converted to a dry basis;

iii. LRAPA-approved biomass fuel Ultimate Analysis ASTM Method (such as D3177-75 or 89 or ASTM D42-38) to perform an Ultimate Analysis including ash content (% wet basis), %C, %H, %N, and %S (% wet basis) and calculate % O (dry basis) using ash, C, H, N, and S (percentages converted to dry basis);

iv. ASTM D5865-98 to determine the Fuel High Heat Content/High Heat Value (HHV)/Gross Calorific Value (GCV) (Btu/lb, wet basis) of the hogged fuel. Calculate the hogged fuel F_d-Factor (dscf/mmBtu) for the composite sample using the results of the Ultimate Analysis (dry basis) in Condition 7.2.d.iii, above and GCV/HHV (dry basis).

e. During each test run, the permittee must monitor and record the following parameters:

i. Visible emissions (VE) as measured by Modified Method 9 within 30 minutes before, during or after each test run, unless weather conditions are such that it is not possible to read opacity

ii. Boiler #2 steaming rate from the steam meter & as calculated from Boiler #2 feedwater water meter readings (in gallons/hr) in accordance with Conditions 4.1.a and 6.1.b (Items B, C, & D);

iii. Boiler #2 excess oxygen (%); and

iv. Scrubber water flow (gpm) and pressure differential readings (p.s.i) both prefilter & post filter;

f. Each test must be conducted while the Boiler is operating between 90 and 110% of the maximum steaming rate. For the purposes of this permit, the maximum steaming rate is defined as the 90th percentile of all average hourly steaming rates (based on daily production) during the 12-month period immediately preceding 30 days before the source test.

g. The permittee must record the multi-clone pressure drop and wet scrubber water flow (gpm) and pressure differential readings (p.s.i) both prefilter & post filter for a period of at least one (1) month prior to the source tests.

h. During each test run, the permittee must collect and/or record the following information:

i. Analysis of fuel characteristics: Fuel characteristics including moisture content, species, approximate percentage of wood and bark, and the percent by weight that passes a 1/8" sieve, must be collected and sent to a laboratory for analysis. The fuel sample analyzed must be a composite of samples taken during each test run from the fuel feed system to the boiler and which is representative of the fuel being burned during the test;

ii. Steaming rate: Boiler steaming rate (lbs/hr) and boiler feedwater rate (gallons/hr);

iii. Operating parameters: Control device exhaust temperature, multi-clone pressure drop wet scrubber water flow (gpm) and pressure differential readings (p.s.i) both prefilter & post filter.

i. All tests must be conducted in accordance with DEQ's Source Sampling Manual and the LRAPA-approved test plan. The test source test plan must be submitted at least **30 days** prior to the date of the test and be approved by the LRAPA Source Test Coordinator. A report which includes the test data and results (including the multiclone and scrubber pressure drop data specified in Condition 7.2.g) must be submitted to LRAPA for review within **60 days** of the test unless otherwise approved in the test plan or an alternate submittal date is approved by LRAPA.

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

8.0 GENERAL MONITORING & RECORDKEEPING REQUIREMENTS

8.1. Operation and Maintenance

The permittee must maintain the following records related to the operation and maintenance of the facility and associated air contaminant control devices: [LRAPA 32-007, 34-016]

a. Upset conditions or breakdown of equipment or air pollution control devices (EU-Boilers Multiclone and Scrubber System) which may result in exceeding the emission limitations specified in this permit must be recorded and reported to LRAPA as soon as possible in accordance with General Conditions G17 through G20. [LRAPA Title 36 – Excess Emissions]

b. PSEL monitoring records in accordance with Condition 6.1.b.

8.2. Excess Emissions

The permittee must maintain the records of excess emissions, as defined in LRAPA title 36, in accordance with General Condition G20. Records of each occurrence of excess emissions must be recorded. [LRAPA 34-016, 36-025]

8.3. Complaint Log

The permittee must maintain a log of all written complaints and complaints received via telephone that specifically refer to air pollution concerns associated to the permitted facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. 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]

8.4. Retention of Records

Unless otherwise specified, the permittee must retain all records for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application and make them available to LRAPA upon request. The permittee must maintain the two (2) most recent years of records onsite. [LRAPA 34-016]

9.0 NOTICIFICATIONS & REPORTING REQUIREMENTS

9.1. Excess Emissions [LRAPA title 36]

a. The permittee must notify LRAPA of excess emissions events at the LRAPA office in accordance with Condition G17.

b. In the event of excess emissions events which could endanger public health or safety, the permittee must immediately notify LRAPA in accordance with Condition G19.

9.2. Annual Report

For each year this permit is in effect, the permittee must submit to LRAPA by **March 1st** two (2) paper copies and one (1) electronic copy of the following information for the previous calendar year: [LRAPA 34-016]

a. Operating parameters records specified in Condition 6.1.b;

b. Calculations of annual pollutant emissions determined each month in accordance with Conditions 5.2, 6.2. and 6.4;

c. A brief summary listing the date, time, and the affected device/process for each excess emission that occurred during the reporting period.

d. Summary of complaints relating to air quality received by permittee during the calendar year in accordance with Condition 8.3.

e. List permanent changes made in facility process, production levels, and pollution control equipment which affected air contaminant emissions.

f. List major maintenance performed on pollution control equipment.

9.3. Greenhouse Gas Registration and Reporting

In the event that the calendar year emission rate of greenhouse gases (CO2e) is greater than or equal to 2,756 tons (2,500 metric tons) in any year, the permittee must **resume** annually registering and reporting its greenhouse gas emissions with LRAPA in accordance with OAR 340-215. [LRAPA 34-016]

9.4. Notice of Change of Ownership or Company Name [LRAPA 37-0030(4)]

The permittee must notify LRAPA in writing, using an LRAPA "Transfer Application Form" within 60 days after the following:

a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon; or

b. Sale or exchange of the activity or facility.

Applicable administrative fees must be submitted with an application for the name change in accordance with Condition 11.2

9.5. Construction or Modification Notices [LRAPA title 34]

The permittee must notify LRAPA in writing using a LRAPA "Notice of Intent to Construct Form," or other permit application form and obtain approval in accordance with LRAPA 34-034 through 34-038 before:

a. Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions;

b. Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or

c. Constructing or modifying any air pollution control equipment.

10.0 ADMINISTRATIVE REQUIREMENTS

10.1. Permit Renewal Application

In accordance with General Conditions G25 throughG28, the permittee must submit the completed application package for renewal of this permit **180 days prior to the expiration date**. Two (2) paper copies and one (1) electronic copy of the application must be submitted to the LRAPA Permit Coordinator listed in Condition 12.1. [LRAPA 37-0040(2)(b)(C)]

10.2. Permit Modifications

The permittee must submit an application for a modification of this permit not less than **60 days** prior to the source modification. When preparing an application, the applicant should also consider submitting the application 180 days prior to allow LRAPA adequate time to process the application and issue a permit before it is needed. A special activity fee must be submitted with an application for the permit modification in accordance with Condition 11.3. The fees and two (2) paper copies and one (1) electronic copy of the application must be submitted to the LRAPA office (See Condition 12.0). [LRAPA 37-0040(3)]

11.0 FEES

11.1. Annual Compliance Fee

The permittee must pay the annual fees specified in LRAPA 37-8020, Table 2, Part 2.e. and Part 3.d. for a Standard ACDP on **December 1** of each year this permit is in effect. The permittee will be invoiced by LRAPA by **October 1st** for the annual fees, in accordance with LRAPA 37-8020, which are due by

December 1st for each year. Late fees in accordance with Part 5 of LRAPA 37-8020 Table 2 will be assessed as appropriate. [LRAPA 37-0066(2)]

11.2. Change of Ownership or Company Name Fee

The permittee must pay the non-technical permit modification fee specified in LRAPA 37-8020, Table 2, Part 4.a. with an application for changing the ownership or the name of the company.

11.3. Special Activity Fees

The permittee must pay the special activity fees specified in LRAPA 37-8020, Table 2, Part 4 with an application to modify the permit.

12.0 LRAPA CONTACTS / ADDRESSES

12.1. LRAPA Office

The permittee must submit all payments, applications to modify the permit, notices, reports (annual reports, source test plans and reports, etc.), and applications that do not include payment to LRAPA's Permit Coordinator:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056
permitting@lrapa.org

12.2. Web Site

Information about air quality permits and LRAPA's regulations may be obtained from the LRAPA website at lrapa.org.

KEC/cmw

8/22/2022

13.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit
ASTM	American Society for Testing and Materials
AQMA	Air Quality Maintenance Area
calendar year	The 12-month period beginning January 1st and ending December 31st
CAO	Cleaner Air Oregon
CFR	Code of Federal Regulations
CO	carbon monoxide
CO_2e	carbon dioxide equivalent
DEQ	Oregon Department of Environmental Quality
dscf	dry standard cubic foot
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
Gal	gallon(s)
GHG	greenhouse gas
gr/dscf	grains per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by LRAPA title 44
I&M	inspection and maintenance
lb	pound(s)
MMBtu	million British thermal units
NA	not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_X	nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O_2	oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	operation and maintenance
Pb	lead
PCD	pollution control device
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	particulate matter less than 2.5 microns in size
ppm	part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
RACT	Reasonably Available Control Technology
scf	standard cubic foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO_2	sulfur dioxide
Special Control Area	as defined in LRAPA 29-0070
TACT	Typically Achievable Control Technology
VE	visible emissions
VOC	volatile organic compound
year	A period consisting of any 12- consecutive calendar months

14.0 GENERAL CONDITIONS

General Conditions and Disclaimers

G1. Until this permit expires, is modified, or is revoked, the permittee is allowed to discharge air contaminants from processes and activities directly related to or associated with the air contaminant sources listed in Condition 1.0 of this permit in addition to any categorically insignificant activities, as defined in LRAPA 12-005, at the source. Discharge of air contaminants from any other equipment or activity not identified herein is **not** authorized by this permit.

G2. In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

G3. In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.

G4. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [LRAPA 37-0020(3)]

G5. The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]

G6. 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.

Performance Standards and Emission Limits

G7. The permittee must not cause or permit the deposition of any particulate matter which is larger than 250 microns in size at sufficient duration and quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

G8. The permittee must not discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090(1)]

G9. The permittee must not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]

G10. The permittee must not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 32-050(1)]

G11. The permittee must not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050(2)]

G12. The permittee must not allow any materials to be handled, transported, or stored; or a building, its

appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(1)]

G13. The permittee may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause nuisance. [LRAPA 49-010(1)]

Outdoor Burning (LRAPA Title 47)

G14. The permittee may not conduct outdoor burning except as may be allowed by LRAPA 47-001 through 47-030.

Asbestos (LRAPA Title 43)

G15. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

Excess Emissions: General Policy

G16. Emissions of air contaminants in excess of applicable standards or permit conditions are unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition, including but not limited to excess emissions resulting from the breakdown of air pollution control devices or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSPS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [LRAPA 36-001(1)]

Excess Emissions: Notification and Recordkeeping

G17. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply: [LRAPA 36-020(1)]

a. The owner or operator, of a small source, as defined by LRAPA 36-005(7), need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health.

b. Notification must be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

c. Follow-up reporting, if required by LRAPA, must contain all information required by Condition G20.

G18. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee must submit a copy of the upset log entries for the reporting period, as required by

Condition G20. [LRAPA 36-025(4)(a)]

G19. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.

G20. For any excess emission event at a source, the permittee must maintain an upset log of all planned and unplanned excess emissions. The upset log must include the following: [LRAPA 36-025(3) and 36-030(1)]

a. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;

b. The date and time the permittee notified LRAPA of the event;

c. The equipment involved;

d. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency

e. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;

f. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations); and

g. The final resolution of the cause of the excess emissions.

The permittee must be keep an excess emissions log of all planned and unplanned excess emissions. The log must include all pertinent information as require in G20.a-g., above must be kept by the permittee for five (5) calendar years. [LRAPA 36-025(3)]

<u>Excess Emissions: Scheduled Maintenance</u>

G21. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution control devices may result in excess emissions, the permittee must obtain prior LRAPA authorization of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. The application must include the following: [LRAPA 36-015(1)]

a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;

b. identification of the specific production or emission control device or system to be maintained;

c. identification of the nature of the air contaminants likely to be emitted during the maintenance period, and the estimated amount and duration of the excess emissions,

including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and

d. identification of specific procedures to be followed which will minimize excess emissions at all times during the scheduled maintenance.

G22. No scheduled maintenance associated with the approved procedures in Condition G21 that is likely to result in excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as $PM_{2.5}$ or PM_{10} nonattainment areas. [LRAPA 36-015(6)]

G23. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-015(3), the permittee must immediately notify LRAPA by telephone of the situation, and must be subject to the requirements of Conditions G17 and G18. [LRAPA 36-015(7)]

Air Pollution Emergencies

G24. The permittee must, upon declaration of an air pollution alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittees responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

Permit Renewal

G25. Application for renewal of this permit must be submitted not less than 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDP. [LRAPA 37-0040(2)(b)]

G26. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit: [LRAPA 37-0082(1)(a)]

a. A timely and complete application for renewal or for an ACDP has been submitted; or
b. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or
c. Another type of permit (ACDP or Title V) has been issued authorizing operation of the source.

G27. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)

G28. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [LRAPA 37-0040(4)]

Termination Conditions

G29. LRAPA may terminate, revoke or modify this permit pursuant to LRAPA 37-082. [LRAPA 37-0082(2)]

a. Issuance of a renewal or new ACDP for the same activity or operation;

b. Written request of the permittee, if LRAPA determines that a permit is no longer required;

c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or;

d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.

G30. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any applicable rule or statute, LRAPA may revoke the permit. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee, and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60th day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]

G31. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three months of the permit expiration date. [LRAPA 37-0082(3)]

G32. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided under LRAPA Title 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A permittee's written request for hearing must be received by LRAPA within 90 days of service of the notice on the permittee and must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]

G33. Any hearing requested must be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

[Revised 1/19/18 and modified 7/12/22 KEC]