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:
Eagle Veneer, Inc.
215 W. 16th Avenue
Junction City, Oregon 97448

Information Relied Upon:
Application Number: 72526
Date: 9/15/2025

Facility Location:
215 W. 16th Avenue
Junction City, Oregon 97448

Land Use Compatibility Statement:
From: City of Junction City
Date: 03/17/2000

Permit Number: 200517
Permit Type: Standard
Primary SIC: 2436 – Softwood Veneer and Plywood
Issuance Date: December 22, 2022
Expiration Date: December 22, 2027
Modification Date: [Insert upon issuance]

Travis Knudsen, Executive Director

January 14, 2026
Effective Date

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

Table 1 Code	Source Description
Part B. 12	Boilers and other fuel burning equipment over 10 MMBTU/hour heat input.
Part B. 57	Plywood manufacturing and/or veneer drying.
Part C. 3	All sources electing to maintain the source's netting basis.

ADDENDUM NO.1
Type B State NSR Simple Technical Permit Modification

In accordance with subparagraph 37-0066(4)(b)(A) of LRAPA's Rules and Regulations, the following changes have been made to the Standard Air Contaminant Discharge Permit (ACDP) No. 200517: The 50:50 natural gas-fired and steam heated veneer dryer (dryer #1) in EU-1 has been replaced with a steam-heated only veneer dryer. The VOC PSEL has been increased to reflect emissions from the new dryer. A production limit, emission factors, and source testing requirements have been added for the new dryer. In accordance with LRAPA 42-0041(3), the PSELs for PM, PM_{10}, $PM_{2.5}$, NO_x, CO and GHG have

been reduced to the facility's potential emission rate. In accordance with LRAPA 42-0020(3)(a), the PSEL for SO_2 has been removed because the facility's PTE for this pollutant is below the de minimis emission level. In accordance with LRAPA 42-0020(1) and 42-0060, the PSEL for single and total HAPs has been removed. Only the amended conditions have been included in this addendum, and all changes are in **bold.**

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
Steam Heated Veneer Dryer #1 (EQ#01)	EU-1	Burley Scrubber	CD#01
NG-Fired & Steam Heated (50:50) Veneer Dryer #2 (EQ#02)		Burley Scrubber	CD#02
NG-Fired Boiler	EU-2	None	NA
Sawdust & Wood Trim Material Handling System	EU-3	Cyclone #1 (EQ#12) & Cyclone #3 (EQ#13) exhaust to Baghouse (EQ#14)	CD#6
Veneer Scarfer Saw VOC & HAP	EU-4	None	NA
Veneer Scarfer Press Resin VOC & HAP	EU-AID-5	None	NA
Paint and Ink VOC & HAP	EU-6	None	NA

5.1 PLANT SITE EMISSION LIMITS (PSELs)

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	**31**	**29**	**14**	**NA**	**19**	**46**	**99**	**21,022**	~~**9**~~	~~**24**~~

5.3. Alternative PSEL Compliance Demonstration

As an alternative to the calculations required by Condition 5.2, the permittee must keep rolling annual records demonstrating that none of the following operational parameters are exceeded on a rolling annual basis. An exceedance of an operational parameter is not necessarily a violation of the PSEL. Should an operational exceedance occur, the permittee shall calculate emissions for the period in accordance with Condition 5.2:

a. The permittee must not exceed 185,000,000 ft^2 (3/8" basis) of total veneer production per calendar 12-month rolling period. [LRAPA 34-016 and 42-0080(1)]

i. The permittee must not exceed 80,000,000 ft^2 (3/8" basis) of veneer production in Veneer Dryer #1 per calendar 12-month rolling period.

b. The permittee must not combust more than 350,316,356 cubic feet per year of natural gas per calendar 12-month rolling period. [LRAPA 34-016 and 42-0080(1)]

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-1 Veneer Dryer #1	**PM**	**0.56**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	PM_{10}	**0.53**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	$PM_{2.5}$	**0.14**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	VOC (heated+ cooling zones +fugitives)	**1.914**	**Lbs/MSF ⅜" basis**	**Y see condition 7.2**
	~~**Single HAP: Methanol**~~	~~**0.068**~~	~~**Lbs/MSF ⅜" basis**~~	~~**Y see condition 7.1**~~
	~~**Total HAP**~~	~~**0.210**~~	~~**Lbs/MSF ⅜" basis**~~	~~**N**~~
EU-1 Veneer Dryer #2	$PM/PM_{10}/ PM_{2.5}$	0.15	Lbs/MSF ⅜" basis	Y see Condition 7.1
	VOC (heated+ cooling zones +fugitives)	0.374	Lbs/MSF ⅜" basis	Y see Condition 7.1
	NO_x	0.12	Lbs/MSF ⅜" basis	Y see Condition 7.1
	CO	0.66	Lbs/MSF ⅜" basis	Y see Condition 7.1
	~~**SO_2**~~	~~**1.7**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
	~~**Single HAP: Methanol**~~	~~**0.068**~~	~~**Lbs/MSF ⅜" basis**~~	~~**Y see Condition 7.1**~~
	~~**Total HAP**~~	~~**0.210**~~	~~**Lbs/MSF ⅜" basis**~~	~~**N**~~
EU-2 NG Boiler (EQ#05)	$PM/PM_{10}/ PM_{2.5}$	2.5	Lbs/MMSCF NG	N
	VOC	5.5	Lbs/MMSCF NG	N
	NO_x	100	Lbs/MMSCF NG	N
	CO	84	Lbs/MMSCF NG	N
	~~**SO_2**~~	~~**1.7**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
	~~**Single HAP: Toluene**~~	~~**0.0265**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
	~~**Total HAP**~~	~~**0.0904**~~	~~**Lbs/MMSCF NG**~~	~~**N**~~
EU-3: Sawdust & Wood Trim Handling System	$PM/PM_{10}/ PM_{2.5}$	0.001	Lbs/BDT	N

Emission Unit, Device or Activity	Pollutant	Emission Factor (EF)	EF Units	Testing Requirement Y/N
EU-4 Scarfer Saw	VOC	0.086	Lbs/MSF ⅜" basis	N
EU-AID-5 Scarfer Press Adhesives	VOC	0.039	Lbs/lb adhesive applied	N
	~~**Total HAP**~~	~~**0.039**~~	~~**Lbs/lb adhesive applied**~~	~~**N**~~
EU-6 Paints & Inks	VOC	0.62	Lbs/lb paint applied	N
	~~**Total HAP**~~	~~**0.113**~~	~~**Lbs/lb paint applied**~~	~~**N**~~

7.1 EU-1 (~~**2**~~ Veneer Dryer~~**s #2**~~) PSEL Emission Factor Verification Testing: PM, NOx, CO, VOC, Methanol & Formaldehyde

Within eighteen months of permit issuance, the permittee must verify the permit emission factors for PM, NOx , CO, VOC, methanol and formaldehyde, specified in Condition 6.3 for Veneer Dryer~~**s #1 and**~~ #2 of EU-1, while ~~**each**~~ **the** veneer dryer is operating at normal maximum operating rate under typical worstcase conditions that generate the highest emissions, by conducting source tests at the veneer dryer compliance demonstration points of ~~**EU-1 (Veneer Dryer #1 Burley Scrubber Exhaust Stack (EP#01) and**~~ Veneer Dryer #2 Burley Scrubber Exhaust Stack (EP#02)) using the following test methods and procedures: [LRAPA 35-0120, 35-0140]

7.2 EU-1 (Veneer Dryer #1) Emission Factor Verification Testing: PM, VOC, Methanol, and Formaldehyde

Within twelve months of startup, the permittee must verify the permit emission factors for PM and VOC for Veneer Dryer #1 in EU-1 by conducting source tests at the Veneer Dryer #1 Burley Scrubber Exhaust Stack (EP#01) using the test methods and procedures listed in Conditions 7.2.a – 7.2.h. [LRAPA 35-0120, 35-0140]

a. EPA Methods 1 through 4 must be used to determine exhaust velocity, flow rate, and O_2, CO_2 and moisture content. [LRAPA 35-0140]

b. DEQ Method 5 must be used to determine the particulate matter concentration. Alternatively, particulate matter tests can be performed using EPA Methods 5 and 202. The test must consist of three (3) runs and each test must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 scf. Particulate matter test results must be reported in grains per dry standard cubic foot (gr/dscf), pounds per hour (lb/hr), and pounds per thousand square feet on a 3/8-inch basis (lb/Msf-3/8"). [LRAPA 35-120 and 35-0140]

c. EPA Method 25A, or an LRAPA-approved alternative, must be used to determine VOC emissions. The test must consist of three (3) runs and each test run must be a minimum of 60 minutes. VOC test results must be reported on an "as propane" basis in pounds per hour (lb/hr), and pounds per thousand square feet on a 3/8-inch basis (lb/Msf-3/8"). [LRAPA 35-120 and 35-0140]

d. NCASI Method CI 98.01 (midget impingers with water; analysis by GC/FID), or an LRAPA-approved alternative, must be used to determine methanol emissions and NCASI Method CI 98.01 (midget impingers with water; analysis by spectrophotometer), or an LRAPA-approved alternative, must be used to determine formaldehyde emissions. The test must

consist of three (3) runs and each test run must be a minimum of 60 minutes. Methanol and formaldehyde emissions must be tested concurrently with VOCs. Methanol and formaldehyde emissions must be reported in pounds per hour (lb/hr) and pounds per thousand square feet on a 3/8-inch basis (lb/Msf-3/8"). [LRAPA 35-120 and 35-0140]

e. The following parameters must be monitored and recorded during the source test: [LRAPA 35-0120]

i. Veneer dryer throughput (Msf-3/8"/hr);
ii. Veneer species, thickness, and dimensions;
iii. Veneer dryer temperatures (green end and dry end – degrees F);
iv. Veneer residence time (min);
v. Amount of redry (%);
vi. Burley Scrubber water flow (gpm)

f. Each test run must be conducted while equipment is operating at levels that equal or exceed ninety percent (90%) of the design capacity, using process materials that generate the highest emissions for the pollutants being tested. [LRAPA 35- 0120(3)]

g. The performance test must be conducted in accordance with DEQ's Source Sampling Manual and the LRAPA-approved source test plan. The source test plan must be submitted at least 30 days prior to the test date. Test data and results must be submitted for review to LRAPA within 60 days unless otherwise approved in the source test plan. [LRAPA 35-0120(3)]

h. 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. [LRAPA 35-0120(3)]

LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
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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:
Eagle Veneer, Inc.
215 W. 16th Avenue
Junction City, Oregon 97448

Information Relied Upon:
Application No: 66205
Date: May 12, 2020
Revised Application No.:68964
Date: November 16, 2022

Plant Site Location:
215 W. 16th Avenue
Junction City, Oregon 97448

Land Use Compatibility Statement:
Approving Authority: City of Junction City
Date: March 17, 2000

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Steven A. Dietrich
Steven A. Dietrich, Director

December 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, 57	Veneer drying	2436	321212
Part B, 12	Fuel Burning Equipment >10 MMBtu/hr heat input	4961	221330
Part C, 3	Source electing to maintain the source's netting basis	NA	NA

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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
Natural Gas (NG)-Fired & Steam Heated (50:50) Veneer Dryer #1 (EQ#01)	EU-1	Burley Scrubber	CD#01
NG-Fired & Steam Heated (50:50) Veneer Dryer #2 (EQ#02)		Burley Scrubber	CD#02
NG-Fired Boiler	EU-2	None	NA
Sawdust & Wood Trim Material Handling System	EU-3	Cyclone #1 (EQ#12) & Cyclone #3 (EQ#13) exhaust to Baghouse (EQ#14)	CD#6
Veneer Scarfer Saw VOC & HAP	EU-4	None	NA
Veneer Scarfer Press Resin VOC & HAP	EU-AID-5	None	NA
Paint and Ink VOC & HAP	EU-6	None	NA

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 condition, 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. For emissions from air contaminant source EU-3 (Material Handling System), 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 48-015(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 April 16, 2015 (EU-3 Baghouse **EQ-#14**) to exceed 0.10 grains per dry standard cubic foot (gr/dscf). [LRAPA 32-015(2)(c)]

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 LRAPA 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. Veneer Drying Emissions Standards and Limitations

a. The permittee must not operate any veneer dryer in EU-1 (Veneer Dryers #1 and #2) such that visible air contaminants emitted from any dryer stack or emission point exceed: [LRAPA 33-060(3)(a)(B)]
   i. A daily average opacity of 10 percent on more than two days within any 12-month period, with the days separated from each other by at least 30 days, as measured by EPA Method 9; and [LRAPA 33-060(3)(a)(B)(i)]
   ii. A maximum opacity of 20 percent at any time as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(ii)]
b. The permittee must maintain and operate each veneer dryer (EU-1 Dryers #1 and #2), at all

times such that air contaminant generating processes and all contaminant control equipment (Burley scrubbers) must be at full efficiency and effectiveness so that the emissions of air contaminants are kept at the lowest practicable levels. [LRAPA 33-060(3)(a)(E)]

c. The permittee must not willfully cause or permit the installation or use of any means, such as dilution, which without resulting in a reduction of the total amount of air contaminants emitted, conceals emissions. [LRAPA 33-060(3)(a)(F)]

d. Where the permittee has not taken effective measures to minimize fugitive emissions, LRAPA may require that the equipment or structures in which processing, handling and storage are done be tightly enclosed, modified, or operated in such a way that air contaminants are minimized, controlled, or removed before discharge to the air. [LRAPA 33-060(3)(a)(G)]

e. The permittee must not cause to be emitted particulate matter from veneer and plywood mill sources (except veneer dryers, fuel burning equipment, and refuse burning equipment), including by not limited to, sanding machines, saws, presses, barkers, hogs, chippers and other material size reduction equipment, process or space ventilation systems, and truck loading and unloading facilities in excess of a total from all sources within the plant site of an average hourly emission rate (lbs/hr) based on maximum hourly productions capacity of the facility times one (1.0) pound per 1000 square feet of plywood or veneer production of a 3/8 inch basis of finished product equivalent The maximum hourly production capacity is the maximum production capacity for a typical operating shift divided by the number of hours in the shift. [LRAPA 33-060(b) & (c)]

f. Processes controlled by the Burley Scrubbers, cyclones and baghouse must not be operated without the control devices online and functioning properly. The Burley Scrubbers, cyclones and baghouse must be operated at all times at the highest reasonable efficiency. [LRAPA 32-007] The permittee must perform routine maintenance of the control devices and keep records as required per Conditions 4.1,6.1.a and 6.1.b]

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 (if not using the Alternative PSEL Compliance Demonstration method in Condition 5.3) for each rolling 12-month period using records of HAP-containing material usage in accordance with Condition 6.1.b.

3.3. Natural Gas Boiler EU-2 Emission Limitations

a. For fuel-burning equipment sources installed, constructed or modified after April 16, 2015 (**EU-2 NG Boiler**), except solid fuel burning devices that have been certified under OAR 340-262-0500, the permittee must not cause, suffer, allow or permit particulate matter emissions from EU-2 NG Boiler in excess of 0.10 grains per dry standard cubic foot (gr/dscf). [LRAPA 32-030(2)]

b. The permittee must not cause or allow to be emitted any visible emissions EU-2 (NG Boiler) 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)]

New Source Performance Standards (NSPS) – Small Industrial-Commercial-Institutional Steam Generating Units – Subpart Dc

c. The permittee must comply with the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units of 40 CFR Part 60 Subpart Dc (§60.40c & §60.48c), which applies to the Cleaver Brooks 27.7 MMBtu Natural Gas Boiler (EU-2). The EU-2 NG Boiler is only capable of operating on natural gas. [LRAPA 46-535(d), 40 CFR 60 Subpart Dc]

4.0 OPERATION AND MAINTENANCE REQUIREMENTS

4.1. Operation of Pollution Control Devices and Processes

The permittee must operate, maintain 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]

4.2. 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]

5.0 PLANT SITE EMISSION LIMITS

5.1. Plant Site Emission Limits (PSELs)

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	53	53	15	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. As an option to the PSEL compliance demonstration requirements in Condition 5.2, the permittee may elect to demonstrate PSEL compliance by monitoring and recording operational parameters as specified in Condition 5.3. [LRAPA 34-016, 42-0080(4)(c)]

5.3. Alternative PSEL Compliance Demonstration

As an alternative to the calculations required by Condition 5.2, the permittee must keep rolling annual records demonstrating that none of the following operational parameters are exceeded on a rolling annual basis. An exceedance of an operational parameter is not necessarily a violation of the PSEL. Should an operational exceedance occur, the permittee shall calculate emissions for the period in accordance with Condition 5.2:

a. The permittee must not exceed 185,000,000 ft^2 (3/8" basis) of total veneer production per calendar 12-month rolling period. [LRAPA 34-016 and 42-0080(1)]

b. The permittee must not combust more than 350,316,356 cubic feet per year of natural gas per calendar 12-month rolling period. [LRAPA 34-016 and 42-0080(1)]

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-1 Burley

Scrubbers, EU-3 Baghouse) 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 G18 - G20. [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 at least 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, C and L (if not using the Alternative PSEL Compliance Demonstration in Condition 5.3) must be 12-month rolling totals: [LRAPA 34-016 and LRAPA 42-080(1)]

Item	Emission Source, Unit Device or Activity (EU-ID#)	Permit Condition #	Process, Parameter or Production (units)	Minimum Monitoring & Recording Frequency
A	EU-1 Veneer (Dryers #1 &#2)	5.3.a	Total veneer production by species EU-1 Dryer #1 & #2 (sq. ft. ⅜"basis)	Monthly
B	Facility-wide Total Natural Gas Combustion	5.3.b	Total amount of natural gas combusted in EU-1 Dryers (SCF NG or MMBtu NG)	Monthly
			Total amount of natural gas combusted in EU-2 NG Boiler (SCF NG or MMBtu NG)	Monthly
C	EU-3 Material Handling/Truck Bin Cyclones (2): EQ#12 & EQ#13	6.1	Total BDT (Bone Dry Tons) of wood trim/sawdust throughput in EU-3 (BDT/month)	Monthly
D	EU-3 Cyclones (EQ#12 & EQ#13)	4.1 & 6.1.a	Visual Inspection	Weekly
E	EU-3 Baghouse EQ#14)	4.1 & 6.1.a	Visual Inspection	Weekly
F	EU-3 Baghouse EQ#14)	4.1 & 6.1.a	Pressure drop readings (inches of H_2O)	Weekly
G	Each Burley Scrubber (including spray nozzles)	3.1.f	Inspection and water flow (gpm)	Daily
H	EU-1 Veneer Dryers (2) and Burley Scrubbers (2)	4.1	Inspection & Maintenance for EU-1 Veneer Dryers (2) & Burley Scrubbers (2)	As performed
I	EU-4 Veneer Scarfer Saw HAP	3.2.a	Total EU-4 saw throughput (sq. ft. ⅜"basis)	Monthly
J	EU-AID-5 & EU-6 VOC/HAP containing materials usage: adhesives, inks, paints, etc.	3.2.a	Pounds/pound of material used (lbs)	Monthly
K	EU-AID-5 & EU-6 VOC/HAP containing adhesives paints and, inks, etc.	3.2.a	VOC % by weight & % by weight for each HAP	Maintain current information (SDS) at all times

Item	Emission Source, Unit Device or Activity (EU-ID#)	Permit Condition #	Process, Parameter or Production (units)	Minimum Monitoring & Recording Frequency
***L**	*Facility-Wide Annual PSEL Compliance Demonstration***if not using Alternative PSEL Compliance Demonstration in Condition 5.3**	*5.2	*Rolling 12-month PSEL Compliance Demonstration (tons/yr)	*By the 15th of each Month

6.2. PSEL Compliance Monitoring using Emission Factors

The permittee must calculate the PSELs 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-1 Veneer Dryers #1 & #2	$PM/PM_{10}/PM_{2.5}$	0.15	Lbs/MSF ⅜" basis	**Y** see Condition 7.1
	VOC (heated+ cooling zones +fugitives)	0.374	Lbs/MSF ⅜" basis	**Y** see Condition 7.1
	NO_x	0.12	Lbs/MSF ⅜" basis	**Y** see Condition 7.1
	CO	0.66	Lbs/MSF ⅜" basis	**Y** see Condition 7.1
	SO_2	1.7	Lbs/MMSCF NG	**N**
	Single HAP: Methanol	0.068	Lbs/MSF ⅜" basis	**Y** see Condition 7.1
	Total HAP	0.210	Lbs/MSF ⅜" basis	**N**
EU-2 NG Boiler (EQ#05)	$PM/PM_{10}/PM_{2.5}$	2.5	Lbs/MMSCF NG	**N**
	VOC	5.5	Lbs/MMSCF NG	**N**
	NO_x	100	Lbs/MMSCF NG	**N**

Emission Unit, Device or Activity	Pollutant	Emission Factor (EF)	EF Units	Testing Requirement Y/N
	CO	84	Lbs/MMSCF NG	**N**
	SO_2	1.7	Lbs/MMSCF NG	**N**
	Single HAP: Toluene	0.0265	Lbs/MMSCF NG	**N**
	Total HAP	0.0904	Lbs/MMSCF NG	**N**
EU-3: Sawdust & Wood Trim Handling System	$PM/PM_{10}/ PM_{2.5}$	0.001	Lbs/BDT	**N**
EU-4 Scarfer Saw	VOC	0.086	Lbs/MSF ⅜" basis	**N**
EU-AID-5 Scarfer Press Adhesives	VOC	0.039	Lbs/lb adhesive applied	**N**
	Total HAP	0.039	Lbs/lb adhesive applied	**N**
EU-6 Paints & Inks	VOC	0.62	Lbs/lb paint applied	**N**
	Total HAP	0.113	Lbs/lb paint applied	**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)]

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

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

If not using the PSEL compliance demonstration alternative in Condition 5.3, 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

The permittee must calculate greenhouse gas emissions to determine compliance with the GHG PSEL by using the following: [OAR 340-215-0040]

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+Instruction

7.0 SOURCE TESTING

7.1. EU-1 (2 Veneer Dryers) PSEL Emission Factor Verification Testing: PM, NOx, CO, VOC, Methanol & Formaldehyde

Within eighteen months of permit issuance, the permittee must verify the permit emission factors for PM, NO_x, CO, VOC, methanol and formaldehyde, specified in Condition 6.3 for Veneer Dryers #1 and #2 of EU-1, while each veneer dryer is operating at normal maximum operating rate under typical worst-case conditions that generate the highest emissions, by conducting source tests at the veneer dryer compliance demonstration points of EU-1 (Veneer Dryer #1 Burley Scrubber Exhaust Stack (EP#01) and Veneer Dryer #2 Burley Scrubber Exhaust Stack (EP#02)) 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 from Veneer Dryers #1 and #2. Each 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) corrected to 12% CO_2, pounds PM per hour and pounds per 1000 sq.ft (MSF) veneer ⅜" basis.

b. EPA Method 7E and EPA Methods 1 through 4 must be used for measuring NO_x emissions from Veneer Dryers #1 and #2. Each 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 and pounds of NO_x per 1000 sq.ft (MSF) ⅜" basis.

c. EPA Method 10 and EPA Methods 1 through 4 must be used for measuring CO emissions from Veneer Dryers #1 and #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 and pounds of CO per 1000 sq.ft (MSF) ⅜" basis.

d. EPA Method 25A and EPA Methods 1 through 4 must be used for measuring VOC emissions from Veneer Dryers #1 and #2. Each 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 on a propane basis, pounds of VOC per hour and pounds of VOC per 1000 sq.ft (MSF) ⅜" basis. **Note:** Methanol and formaldehyde emissions, as specified in Conditions 7.1.e and 7.1.f, are to be measured separately and concurrently to verify their contribution to the total VOC emissions. Mass emissions from EPA Method 25A (as propane), methanol and formaldehyde will be summed to determine total VOC.

e. NCASI Method CI/WP 98.01 must be used to measure methanol (MeOH) emissions from Veneer Dryers #1 and #2. Each 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, pounds of Methanol per hour and pounds of Methanol per 1000 sq. ft. (MSF) ⅜" basis.

f. NCASI Method CI/WP 98.01 must be used to measure formaldehyde (HCOH) emissions from Veneer Dryers #1 and #2. Each 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, pounds of formaldehyde per hour and pounds of formaldehyde per 1000 sq. ft. (MSF) ⅜" basis,

g. During each test run, the permittee must monitor and record visible emissions (VE) as measured by EPA Method 9 (for a minimum of six minutes per each test run) within 30 minutes before, during or after each test run, unless weather conditions are such that it is not possible to read opacity.

h. Each test must be conducted while the veneer dryers are operating between 90 and 110% of the maximum production rate. For the purposes of this permit, the maximum production rate is defined as the 90^{th} percentile of all average hourly veneer drying rates (square feet ⅜ basis) based on daily production rates during the 12-month period immediately preceding 30 days before the source test.

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

i. Species of veneer dried and type (Doug Fir, Heart and/or Sap);
ii. Amount of veneer dried (1000 ft^2 ⅜" basis) and surface footage;
iii. Amount of redry (%);
iv. Dryer conditions for each dryer, including dryer temperatures by zone and drying time;
v. Visible emissions records in accordance with Condition 7.1.g;
vi. Control device operating parameters for each Burley scrubber including exhaust temperatures and water flow (gpm); and
vii. Natural gas usage in the veneer dryers and the NG-fired boiler in total MMSCF natural gas.

j. All tests must be conducted in accordance with DEQ's Source Sampling Manual and the LRAPA-approved 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 test plan or an alternate submittal date is approved by LRAPA.

k. 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-1 Scrubbers and dryers and EU-2 NG Boiler) 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 G16 through G19. [LRAPA Title 36 – Excess Emissions]

b. Operation and maintenance 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 G19. 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. [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 G16.

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 G18.

9.2. Annual Report

For each year this permit is in effect, the permittee must submit to LRAPA by **March 15th** 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 (if not using the Alternative PSEL Compliance Demonstration method in Condition 5.3);

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

If the calendar year emission rate of greenhouse gases (CO2e) is ever greater than or equal to 2,756 tons (2,500 metric tons) in any year, the permittee must annually register and report 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 G24 through G27, the permittee must submit the completed application package for renewal of this permit **180 days prior to the expiration date**. The application must be submitted to the LRAPA Permit Coordinator listed in Condition 12.1. [LRAPA 37-0040(2)(b)(C)]

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 by **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. for 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 for 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 www.lrapa.org.

KEC/cmw

12/22/2022

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
gpm	gallons per minute
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
MSF	thousand square feet
NA	not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NG	Natural Gas
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 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)]

G8. 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)]

G9. 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)]

G10. 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)]

G11. 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)]

G12. 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)

G13. The permittee may not conduct outdoor burning except as may be allowed by LRAPA 47-001 through 47-030.

Asbestos (LRAPA Title 43)

G14. 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

G15. 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

G16. 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 G19.

G17. 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 G19. [LRAPA 36-025(4)(a)]

G18. 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.

G19. 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 G19.a-g., above must be kept by the permittee for five (5) calendar years. [LRAPA 36-025(3)]

Excess Emissions: Scheduled Maintenance

G20. 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.

G21. No scheduled maintenance associated with the approved procedures in Condition G20 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)]

G22. 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 G16 and G17. [LRAPA 36-015(7)]

Air Pollution Emergencies

G23. 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

G24. 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)]

G25. 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.

G26. 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)

G27. 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

G28. 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.

G29. 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)]

G30. 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)]

G31. 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)]

G32. 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]