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:
Rosboro Company, LLC –Vaughn Facility
22833 Vaughn Rd.
Veneta, Oregon 97487

Plant Site Location:
22833 Vaughn Rd.
Veneta, Oregon 97487

Permit Number: 200550
Permit Type: Standard
SIC: 2439 Structural Wood Members
4961 Fuel-burning Equipment
Date Issued: August 22, 2022
Expiration Date: August 22, 2027

Information Relied Upon:
Application No.: 67360; 68339; 68440
Date Received: 8/10/21; 3/31/22; 5/26/22

Land Use Compatibility Statement:
From: Lane County
Date: February 22, 1995

Fee Basis (LRAPA title 37, Table 1)
B.45 Millwork (structural wood members)
C.3 Source electing to maintain netting basis
C.4 Source that requests a PSEL equal to or greater than the SER for a regulated pollutant

Permitted Sources:
1 Wood-fired Boiler (with Multiclone)
3 Material-handling Baghouses
1 Glue Laminated Beam Production
Fugitive Sources (hog fuel pile and sawdust pile)

Issued By: Steven A. Dietrich
Steven A. Dietrich, Director

Effective Date: August 22, 2022

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge exhaust gases containing contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Protection Agency (LRAPA).

Emission Unit and Pollution Control Device Identification

2. The emission units regulated by this permit are the following:

Emission Unit (EU)	Emission Unit Description	Pollution Control Device
EU-Boiler	**Boiler**: M.A. Roberts & Co., wood-fired, dutch oven, 35 MMBtu/hr, 35 M lb steam/hr, 150 psi steam, 1939 mfg, 1952 installed.	Multiclone 1: Western Precipitation Co. P-21396-AO, installed 1952
EU-Lam	**Lam 2**: Custom Glue Laminated Beam Production **Lam 3**: Stock Glue Laminated Beam Production	NA
EU-Finish	**Finish**: Glue Laminated Beam Finishing	NA
EU-MH	**Material Handling (MH)**: Roads –paved and unpaved, dry sawdust, shavings, and sanderdust pneumatically conveyed to truck bin. Also truck bin unloading	Three (3) Baghouses: B1: Carter-Day (installed 1988), B2: Pneumafil (installed 2019), and B-3: Donaldson (installed 1990)
EU-HF Pile	**Hog Fuel (HF) Pile**: Hog fuel storage and handling	None
EU-SD Pile	**Sawdust (SD) Pile**: Sawdust storage and handling	None

Performance Standards and Emission Limitations

Plant Site Emission Limits (PSELs)

3. The total emissions from the source must not exceed the following annual (12-month rolling) limits below: [LRAPA 42-0040, 42-0041]

Annual (12-month rolling) PSEL
(tons/year)

Source	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	CO	VOC	GHG	Single HAP	Total HAP
Plant Site Total	**98**	**91**	**46**	**39**	**53**	**99**	**39**	**74,000**	**9**	**24**

4. ***By the fifteenth (15th) day of each month***, the permittee must calculate the emissions from the previous 12 months using the method in Condition 5, except for GHGs. The totals must be compared to the PSELs in Condition 3 to ensure compliance with the PSELs. [LRAPA 34-016, and 42-0080]

5. Emissions must be estimated using the following equation: [LRAPA 35-0160 and 42-0080]

$$E = \Sigma(EF \times P)/2000$$

E = Emissions in tons/year
∑ = Symbol representing "summation of"
EF = Pollutant emission factor (see Condition 23).
P = Process production or parameter (see Condition 17).

Fugitive Emission Limitations

6. The permittee must not allow 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 not be limited to the following: [LRAPA 48-015(1)]

6.a. Use, where possible, of 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;
6.b. Application of water, or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
6.c. Full or partial enclosure of materials stockpiles in cases where application of water, or other suitable chemicals is not sufficient to prevent particulate matter from becoming airborne;
6.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
6.e. Adequate containment during sandblasting or other similar operations;
6.f. The covering of moving open bodied trucks transporting materials likely to become airborne; and
6.g. The prompt removal from paved streets of earth or other material which does or may

become airborne.

7. The permittee must demonstrate compliance with Condition 6 by conducting a fugitive emissions survey. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the facility using EPA Method 22 for any sources of fugitive emissions. For purposes of this condition, fugitive emissions are visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period. The minimum observation time must be at least six (6) minutes. The person conducting the observation must follow EPA Method 22. If sources of fugitive emissions are identified, the permittee must: [LRAPA 34-016, LRAPA 48-015(2)&(3)]

   7.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 6; or

   7.b. Develop an LRAPA-approved Fugitive Emission Control Plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.

8. The permittee must record the following information in a monitoring log pertaining to Condition 7 for all fugitive emission surveys: date, time, person conducting the survey, any excess fugitive emissions observed, and any corrective actions taken. [LRAPA 34-016]

Boiler

9. Particulate matter from the EU-Boiler must not exceed 0.15 grains per dry standard cubic foot corrected to 12 percent carbon dioxide. [LRAPA 32-020(1)(b)(B)]

10. Visible emissions from the EU-Boiler must not equal or exceed 20% opacity for a period or periods aggregating more than three minutes in any one hour with the following exception: [LRAPA 32-010(4)(b)]

   10.a. Visible emissions may equal or exceed 20 percent opacity but may not equal or exceed 40 percent opacity, as the average of all three-minute aggregate periods during grate cleaning operations provided the grate cleaning is performed in accordance with a grate cleaning plan approved by LRAPA.

11. The permittee must demonstrate compliance with Conditions 9 and 10 by conducting a visible emissions survey. At least once each month, for a minimum of six (6) minutes while EU-Boiler is operational, the permittee must visually inspect emission unit EU-Boiler for visible emissions in accordance with EPA Method 22 if EU-Boiler. The person conducting the survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If any visible emissions during the survey are identified from any of these emission units the permittee must perform one (1) of the following: [LRAPA 32-007(1)]

   11.a. Take corrective action to minimize the emissions; or

   11.b. Use EPA Method 9 and the data reduction procedures in EPA Method 203B within 24 hours. The use of these two EPA methods is known as Modified EPA Method 9 for the purposes of this permit. Each Modified EPA Method 9 test must be a minimum of six (6) minutes long unless any one (1) reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 10 is documented, whichever period is shorter.

10. Testing Requirements (Wood-fired Boiler CO, NO_X, PM and PM_{10}, Emissions)

10.a. **Wood-fired Boiler (EU-Boiler) Compliance and Emission Factor Verification Testing**

10.a.i. ***The testing specified in this condition must be performed within 180 days of boiler (EU-Boiler) startup***. EU-Boiler startup does not include energizing individual components of the boiler or for purposes of maintenance or testing the integrity of the system. Startup occurs on the first day that steam is produced and for which the boiler runs for more than three (3) days consecutively.

10.a.ii. The permittee must submit a source test plan at least 30 days prior to the date of the test.

10.a.iii. EPA Method 10 and EPA Methods 1 through 4 must be used for measuring CO emissions from the wood-fired boiler. The test must consist of three (3) runs and each test run must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 scf. Test results must be reported parts per million (ppm), ppm corrected to 12% CO_2, pounds per hour, and pounds per 1000 pounds of steam produced.

10.a.iv. EPA Method 7e and EPA Methods 1 through 4 must be used for measuring NO_X emissions from the wood-fired boiler. The test must consist of three (3) runs and each test run must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 scf. Test results must be reported parts per million (ppm), ppm corrected to 12% CO_2, pounds per hour, and pounds per 1000 pounds of steam produced.

10.a.v. Oregon DEQ Method 5 and EPA Methods 1 through 4 must be used for measuring PM and PM_{10} emissions from the wood-fired boiler and baghouse. The test must consist of three (3) runs and each test run must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 scf. Test results must be reported as pounds per hour, grains per dry standard cubic foot (gr/dscf) corrected to 12% CO_2, and pounds per 1000 pounds of steam produced.

10.a.vi. Each test must be conducted while the wood-fired 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 steam rates (based on daily production) during the 12-month period immediately preceding 30 days before the source test.

10.a.vii. The permittee must record the multiclone pressure drop daily for a period of at least one (1) month prior to the initial source test.

10.a.viii. A report, which includes the results of the source test and multiclone pressure drop, must be submitted to LRAPA for review and approval within 60 days of completing the source test, unless otherwise approved by LRAPA.

10.a.ix. During each test run, the permittee must collect or record the following information

10.a.ix.A. 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;

10.a.ix.B. Steaming rate: Boiler steaming rate (lbs/hr);

10.a.ix.C. Operating parameter: Control device exhaust temperature and pressure drop for the multiclone, and

10.a.ix.D. Visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 5 test run, unless weather conditions are such that it is not possible to read opacity.

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

11. Within 30 days after startup of EU-Boiler, the permittee must conduct an initial performance tune-up and biennially thereafter for the wood-fired boiler in EU-Boiler as follows: [40 CFR 63.11196(c), 63.11201(b), 63.11214(b) and 63.11223(b)(7)]:

    11.a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary. The burner inspection may be delayed until the next scheduled boiler shutdown, not to exceed 36 months from the previous inspection;

    11.b. 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 for the burner, if available;

    11.c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. The inspection may be delayed until the next scheduled boiler shutdown, not to exceed 36 months from the previous inspection;

    11.d. Measure the exhaust concentrations in the effluent stream of carbon monoxide (CO) in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made. Measurements may be made either on a dry or wet basis, as long as it is the same basis before and after any adjustments are made. Measurements may be taken using a portable CO analyzer;

    11.e. Optimize the total emissions of CO. This optimization must be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide (NO_X) requirement to which the unit is subject;

    11.f. If the boiler is not operating on the required date for the tune-up, the tune-up must be conducted within 30 days of startup;

    11.g. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.

12. The permittee must maintain on-site and submit, if requested, reports containing the tune-up information as required in Condition 11, specifically: [40 CFR 63.11223(b)(6) (i) through (iii) and 63.11225(c)(2) (i) and (ii)]

    12.a. Identification of the boiler, date of tune up, the procedures followed for the tune-up, and the manufacturer's specifications to which the boiler was tuned.

    12.b. The concentrations of CO in the effluent stream in parts per million, by volume (ppmv), and oxygen in volume percent (%), measured at high fire or typical operating load, before and after the tune-up, as detailed in Condition 11;

    12.c. A description of any corrective actions taken as part of the tune-up;

12.d. The type and amount of fuel used each month over the 12 months prior to the biennial tune-up but only if the unit 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;

13. No later than 120 days after conducting the initial tune up required by Condition 11, the permittee must submit the Notification of Compliance Status including the statement, signed by the responsible official that includes the following:

13.a. The permittee must submit the information required in 40 CFR 63.9(h)(2), except the information listed in 40 CFR 63.9(h)(2)(i)(B), (D), (E), and (F). If the permittee conducts any opacity or visible emission observations, or other monitoring procedures or methods, the permittee must submit that data to LRAPA, [40 CFR 63.11225(a)(4)(ii)]

13.b. "This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler.", and [40 CFR 63.11225(a)(4)(ii)]

13.c. "This facility has had an energy assessment performed according to 40 CFR 63.11214(c)." [40 CFR 63.11225(a)(4)(iii)]

13.d. 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 LRAPA.

14. For EU-Boiler, the permittee must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in Table 2 to Subpart JJJJJJ of Part 63, satisfies the energy assessment requirement. Energy assessor approval and qualification requirements are waived in instances where past or amended energy assessments are used to meet the energy assessment requirements. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines for energy management or compatible with ISO 50001 for at least 1 year between January 1, 2008, and the compliance date specified in 40 CFR 63.11196 that includes EU-Boiler also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items 14.a to 14.d appropriate for the on-site technical hours listed in 40 CFR 63.11237. [40 CFR 63.11201(b)]

14.a. A visual inspection of the boiler system,

14.b. An evaluation of operating characteristics of the boiler systems, specifications of energy use systems, operating and maintenance procedures, and unusual operating constraints,

14.c. An inventory of major energy use systems consuming energy from EU-Boiler and which are under the control of the permittee,

14.d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage,

14.e. A review of the facility's energy management practices and provide recommendations for improvements consistent with the definition of energy management practices, if identified,

14.f. A list of major energy conservation measures that are within the facility's control,

14.g. A list of the energy savings potential of the energy conservation measures identified, and

14.h. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.

15. The permittee must maintain the following records specified in the conditions below: [40 CFR 63.11225(c)]

15.a. 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)]

15.b. 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 15.b.i through 15.b.ii. [40 CFR 63.11225(c)(2)]

15.b.i. 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)]

15.b.ii. 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 combust 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 is listed non-waste under 40 CFR 241.4(a). [40 CFR 63.11225(c)(2)(ii)]

15.c. 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)]

16. The permittee must comply with the following, as applicable:

16.a. The permittee must prepare a biennial compliance certification report for the previous biennial period and include it with the appropriate annual report specified in Condition 18. The report must include the following: [40 CFR 63.11225(b)]

16.a.i. Company name and address;

16.a.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 40 CFR 63 subpart JJJJJJ. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:

16.a.ii.A. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up, as applicable."

16.a.ii.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."

16.a.ii.C. "This facility complies with the requirement in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."

16.a.iii. If EU-Boiler experiences any deviations from the applicable requirements during the reporting period, include a description of the deviations, the time periods during which the deviations occurred, and the corrective action taken.

16.b. If the permittee intends to commence or recommence combustion of solid waste, the permittee must provide 30 days prior notice of the date upon which the permittee will commence or recommence combustion of solid waste. The notification must include the following information: [40 CFR 63.11225(f)]

16.b.i. The name of the owner or operator of the affected source, the location of the source, the boilers(s) that will commence burning solid waste, and the date of the notice;

16.b.ii. The currently applicable subcategory under 40 CFR part 63, subpart JJJJJJ;

16.b.iii. The date on which the boiler(s) became subject to the currently applicable emission limits; and

16.b.iv. The date upon which combusting solid waste will commence.

16.c. Notification 30 days prior to switching to a fuel(s) that may result in the applicability of a different subcategory or a switch out of 40 CFR part 63, subpart JJJJJJ due to a switch to 100 percent natural gas, including the following information: [40 CFR 63.11225(g)]

16.c.i. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, were physically changed, or took a permit limit, and the date of the notice;

16.c.ii. The date on which the boilers became subject to the currently applicable emission limits; and

16.c.iii. The date upon which the fuel switch, physical change, or permit limit occurred.

16.d. 40 CFR Part 63 General Provisions according to Table 8 of Subpart JJJJJJ, incorporated by reference. [40 CFR 63.11235]

Monitoring, Recordkeeping and Reporting Requirements

17. The permittee must keep a record of the following information for a period of at least five (5) years following date of entry and must be available for inspection by authorized representatives of LRAPA: [LRAPA 34-016 and 42-0080]

Emissions Unit	Process Parameter (units)	Measurement Technique	Minimum Recording Frequency
EU-Boiler	Steam Production: Steam produced by boiler (lbs)	Steam flow meter	Monthly
EU-Boiler	Visible emissions survey	Log	Monthly
EU-HF Pile	Hog Fuel Burned (Cubic Units)	Fuel Receipts	Monthly
EU-SD Pile	Sawdust transferred (Cubic Units)	Sawdust transfer records	Monthly
EU-MH	Lam Beam Production (Cubic Units)	Production Records	Monthly
EU-Lam	Lam Beam Production (MBF and lbs adhesive used)	Recordkeeping and SDS, or Technical Data Sheets	Monthly
EU-Finish	Type, Amount (lbs) of Lam Face and Finger Joint Adhesive applied to the beams	Recordkeeping and SDS, or Technical Data Sheets	Monthly
Facility-wide	Fugitive emissions survey	Log	Monthly
Facility-wide	Upset log of all planned and unplanned excess emissions	Log in accordance with General Condition G15	Per occurrence
Facility-wide	Calculations of emissions to demonstrate compliance with the PSELs in Condition 3, including the supporting process parameter and emission factor information.	Recordkeeping	Monthly

18. Annual Report: The permittee must submit to LRAPA the information in Condition 17 ***by March 1st of each year***. [40 CFR 63.1125(b), LRAPA 35-0160 and 42-0080]

19. The annual report required by Condition 18 may also include annual greenhouse gas emissions, if required, in accordance with OAR 340 division 215, however, the GHG report must be submitted no later than March 31st each year, if required. [OAR 340-215-0010(2) and OAR 340-215-0040]

Outdoor Burning

20. The permittee is prohibited from conducting outdoor burning on the plant site except as may be allowed by LRAPA title 47. [LRAPA-47-001]

Fee Schedule

21. In accordance with adopted regulations, the permittee will be invoiced for the annual permit fees on October 1st, with fees due December 1st of each year. [LRAPA 37-8020 Table 2]

22. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions must be reported to the following office: [LRAPA 35-0160]

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

Emission Factors

23. The permittee must use the following emission factors to estimate emissions in accordance with Condition 4: [LRAPA 34-016 and 42-0080(4)(c)]

Emission Unit/Source	**Pollutant**	**Emission Factor**	**Units**
Boiler	PM	0.63	lb/M lb steam
Boiler	PM10	0.60	lb/M lb steam
Boiler	PM2.5	0.30	lb/M lb steam
Boiler	CO	0.64	lb/M lb steam
Boiler	NOx	0.34	lb/M lb steam
Boiler	SO2	0.014	lb/M lb steam
Boiler	VOC	0.031	lb/M lb steam
HF Pile	PM	0.0074	lb/cubic unit
HF Pile	PM10	0.0037	lb/cubic unit
HF Pile	PM2.5	0.000555	lb/cubic unit
HF Pile	VOC	0.1812	lb/cubic unit
SD Pile	PM	0.0074	lb/cu unit
SD Pile	PM10	0.0037	lb/cubic unit
SD Pile	PM2.5	0.000555	lb/cubic unit
SD Pile	VOC	1.22	lb/cubic unit
Lam: Cascomel MF	VOC	0.0132	lb/lb adhesive
Lam: Cascomel 4720/5025	VOC	0.00891	lb/lb adhesive
Lam: Face	VOC	0.01018	lb/lb adhesive
Finish	VOC	Material Balance	% or lb/lb
MH	PM	0.276	lb/cubic unit
MH	PM10	0.276	lb/cubic unit

Emission Unit/Source	**Pollutant**	**Emission Factor**	**Units**
MH	PM2.5	0.138	lb/cubic unit
B1	PM	0.0012	lb/cubic unit
B1	PM10	0.0012	lb/cubic unit
B1	PM2.5	0.0012	lb/cubic unit
B2	PM	0.0012	lb/cubic unit
B2	PM10	0.0012	lb/cubic unit
B2	PM2.5	0.0012	lb/cubic unit
B3	PM	0.0012	lb/cubic unit
B3	PM10	0.0012	lb/cubic unit
B3	PM2.5	0.0012	lb/cubic unit
HAPs			
Source	**Pollutant**	**Emission Factor**	**Units**
Boilers	Methanol	0.0143	lb/ton HF
Boilers	Total HAP	0.38465	lb/ton HF
Lam: Cascomel MF	Formaldehyde	0.00008	lb/lb adhesive
Lam: Cascomel MF	Methanol	0.01312	lb/lb adhesive
Lam: Cascomel 4720/5025	Methanol	0.00773	lb/lb adhesive
Lam: Cascomel 4720/5025	Formaldehyde	0.00007	lb/lb adhesive
Lam: Face	Methanol	0.00580	lb/lb adhesive
Lam: Face	Formaldehyde	0.000097	lb/lb adhesive
Lam: Face	Phenol	0.00111	lb/lb adhesive
Finish Face Repair	Formaldehyde	0.00019	lb/lb
Finish Face Repair	Methanol	0.00037	lb/lb
Finish Gap Filling	Formaldehyde	0.00038	lb/lb
Finish Gap Filling	Methanol	0.00074	lb/lb
Finish - Hand Putty	Styrene	0.27	lb/lb
Finish – Spray Paint	Ethylbenzene	0.101	lb/lb

MKH/cmw 08/18/22

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit
AQMA	Air Quality Management Area
ACS	Applied coating solids
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
BDT	Bone Dry Ton
Btu	British thermal unit
CAM	Compliance Assurance Monitoring
CAO	Cleaner Air Oregon
CD ID	Control device identifier
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
CI	Compression Ignition
CMS	Continuous Monitoring System
CO	Carbon Monoxide
CO_2	Carbon dioxide
CO_2e	Carbon dioxide equivalent
COMS	Continuous Opacity Monitoring System
CPDS	Certified Product Data Sheet
CPMS	Continuous parameter monitoring system
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission factor
EPA	US Environmental Protection Agency
EU	Emissions Unit
EU ID	Emission unit identifier
FCAA	Federal Clean Air Act
FHAP	Federal Hazardous Air Pollutants as defined by LRAPA Title 12
ft^2	Square foot
FSA	Fuel sampling and analysis
GHG	Greenhouse Gas
GMAW	Gas metal arc welding
GT	Green ton
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)
HCFC	Halogenated Chlorofluorocarbons
Hr	Hour
ID	Identification number or label
I&M	Inspection and maintenance
Lb	Pound
LRAPA	Lane Regional Air Protection Agency
MACT	Maximum Achievable Control Technology
MERV	Minimum efficiency reporting values
MM	Million
MMBF	Million Board Feet
MMBtu	Million British thermal units
NA	Not applicable
NESHAP	National Emission Standards for Hazardous Air Pollutants
NO_x	Nitrogen oxides
NSPS	New Source Performance Standards
NSR	New Source Review
O_2	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
OPR	Operation
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
$PM_{2.5}$	Particulate matter less than 2.5 microns in size
PM_{10}	Particulate matter less than 10 microns in size
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	pounds per square inch, actual
PTE	Potential to Emit
QIP	Quality Improvement Plan
RICE	Reciprocating Internal Combustion Engine
SACC	Semi-Annual Compliance Certification
SCEMP	Surrogate Compliance Emissions Monitoring Parameter
Scf	Standard cubic foot
SDS	Safety data sheet
SER	Significant emission rate
SERP	Source emissions reduction plan
SI	Spark Ignition
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO_2	Sulfur dioxide
ST	Source test
TAC	Toxic air contaminant
TACT	Typically Achievable Control Technology
TEU	Toxic Emission Unit
TPY	Tons per year
VE	Visible emissions
VMT	Vehicle miles traveled
VOC	Volatile organic compounds
VHAP	Volatile hazardous air pollutant
Year	A period consisting of any 12-consecutive calendar month

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

G1. 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)]

G2. The permittee must allow the Director or his/her authorized 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 otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]

G3. 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

G4. 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]

G5. 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)]

G6. 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)]

G7. 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)]

G8. 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)]

G9. 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)]

G10. The permittee may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

G11. 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 Record-keeping

G12. 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 G15.

G13. 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 G15. [LRAPA 36-025(4)(a)]

G14. Any excess emissions which could endanger public health or safety must immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.

G15. The permittee must keep 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. date and time each event was reported to LRAPA;

b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;

c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;

d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and

e. final resolution of the cause of the excess emissions.

Upset logs must be kept by the permittee for five (5) calendar years. [LRAPA 36-025(3)]

Excess Emissions: Scheduled Maintenance

G16. 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.

G17. No scheduled maintenance associated with the approved procedures in Condition G16 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)]

G18. 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 G12 and G13. [LRAPA 36-015(7)]

Air Pollution Emergencies

G19. 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]

Notification of Construction/Modification

G20. The permittee must notify LRAPA in writing using an LRAPA “Notice of Intent to Construct” form,

or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:

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

b. making any physical change or change in the 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 pollution control equipment.

Notification of Name Change

G21. The permittee must notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon. [LRAPA 37-0030(4)]

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

G22. 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)]

G23. 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 LRAPA Title V Operating Permit has been submitted; or
b. Another type of permit, ACDP or Title V, has been issued authorizing operation of the source.

G24. 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)

G25. 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

G26. This permit will be automatically terminated upon: [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.

G27. 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)]

G28. 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)]

G29. 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)]

G30. Any hearing requested must be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

Asbestos

G31. The permittee must comply with the asbestos abatement requirements in LRAPA Title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 1/19/18]