



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

Review Report

Stella-Jones Corporation
90049 Highway 99 North
Eugene, Oregon 97402

Permit No. 205108

Source Information:

Primary SIC	2491 – Wood Preserving
NAICS	321114 – Wood Preservation

Source Categories (LRAPA title 37, Table 1)	B. 73 – Wood preserving C. 3 – Source electing to maintain the netting basis
Public Notice Category	III

Compliance and Emissions Monitoring Requirements:

Unassigned Emissions	Y
Emission Credits	N
Compliance Schedule	N
Source Test [date(s)]	N

COMS	N
CEMS	N
Ambient monitoring	N

Reporting Requirements

Annual Report (due date)	February 15
Semi-Annual Report (due date)	August 15
GHG Report (due date)	March 31
Monthly Report (due date)	N

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

Air Programs

NSPS (list subparts)	Dc
NESHAP (list subparts)	QQQQQQ
40 CFR part 64 Compliance Assurance Monitoring (CAM)	N
Regional Haze (RH)	N
TACT	N
Part 68 Risk Management	N
Cleaner Air Oregon (CAO)	N
Synthetic Minor (SM)	N
SM-80	N
Title V	N
Major FHAP Source	N
Federal Major Source	N
Type A State New Source Review	N
Type B State New Source Review	N
Prevention of Significant Deterioration (PSD)	N
Nonattainment New Source Review (NSR)	N
Acid Rain	N

Clean Air Mercury Rule (CAMR)	N
>20 Megawatts	N

Permittee Identification

1. Stella-Jones Corporation (“the facility”) operates a wood treatment facility at 90049 Highway 99 North, Eugene, Oregon.

General Background

2. This facility treats wood products under pressure in closed cylindrical vessels called retorts. The treatment chemicals include DCOI (Dichloro-octyl-isothiazolinone), copper naphthenate (CuNap), and a carrier oil (high flash No. 2 diesel fuel) for the wood preservatives. Current air emissions result from the four (4) retorts, a natural gas-fired boiler with a maximum heat input rate of 16.28 MMBtu per hour under NC-205108-A23, a backup 14.7 MMBtu per hour boiler, a process water evaporator system, and fugitive emissions sources. This facility no longer uses pentachlorophenol. The facility has been in operation since 1953.

Reasons for Permit Actions and Fee Basis

3. This permit action is a renewal of an existing Standard Air Contaminant Discharge Permit (Standard ACDP) which was issued on November 20, 2020 and was originally set to expire on November 10, 2025. The facility must obtain a Standard ACDP and is subject to the associated fees for Standard ACDPs because it operates a process listed in LRAPA title 37, Table 1 Part B.73 – Wood preserving and is electing to maintain a netting basis as identified in LRAPA title 37, Table 1 Part C.3.

Attainment Status

4. The facility is located inside the Eugene-Springfield Air Quality Management Area. The facility is located in an area that has been designated attainment/unclassified for PM_{2.5}, ozone (VOC), NO₂, SO₂, and Pb and a maintenance area for CO and PM₁₀. The facility is located within 100 kilometers of two (2) Class I air quality protection areas: Diamond Peak Wilderness and Three Sisters Wilderness area.

Permitting History

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

Date Approved	Permit Action Type	Description
04/01/1990	ACDP	Initial air permit.
11/07/1995	NC-205108-A95	Construction of third retort and 14.7 MMBtu/hr boiler.
02/02/1996	NC-205108-B95	Construction of fourth retort.
12/18/1996	ACDP	Incorporate two new retorts and 14.7 MMBtu/hr boiler.
04/01/1998	ACDP	Renewal.
04/01/2003	ACDP	Renewal.
01/29/2004	ACDP Addendum No. 1	Name change.
05/10/2004	NC-205108-A04	Installation of a new fiber bed filter for the vacuum pump exhaust.
09/24/2004	ACDP Addendum No. 2	Addition of the new fiber bed filter for the vacuum pump exhaust.
05/23/2006	NC-205108-A06	Installation of vapor recovery hoods above the retort door openings.
11/23/2009	ACDP	Renewal.
12/16/2009	NC-205108-A09	Installation of a second fiber bed filter for retort door openings.
03/17/2015	Standard ACDP	Renewal.

Date Approved	Permit Action Type	Description
08/22/2019	NC-205108-A19	Authorize use of a rented 12.6 MMBtu/hr boiler while the 14.7 MMBtu/hr boiler is repaired.
06/17/2020	NC-205108-A20	Approval to use DCOI and copper naphthenate as alternatives to pentachlorophenol
11/10/2020	Standard ACDP	Renewal.
11/09/2021	NC-205108-B21	Authorize use of a temporary diesel-fired 27 kW generator for power while modifying the wood treatment drip pad.
04/13/2022	NC-205108-A22	Authorize use of a rented 14.6 MMBtu/hr boiler while the 14.7 MMBtu/hr boiler is repaired.
08/23/2023	NC-205108-A23	Construction of a new 16.28 MMBtu/hr natural gas-fired boiler.
12/06/2023	Standard ACDP Addendum No. 1	Incorporate new 16.28 MMBtu/hr natural gas-fired boiler; set PSEs to PTE; reset 14.7 MMBtu/hr boiler to gas-fired boiler.
01/11/2024	Standard ACDP Addendum No. 2	Amendment to change the name of the company from "McFarland Cascade Pole & Lumber Company" to "Stella-Jones Corporation".
10/11/2024	NC-205108-A24	Authorize construction of new evaporator system
Upon Issuance	Standard ACDP	Renewal.

Emission Unit Descriptions

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

Emission Unit ID	Description	Pollution Control Device (PCD ID)	Installed / Last Modified
Significant Emission Units			
EU-1	Oil-based Wood Preserving including: <ul style="list-style-type: none"> • 4 Retorts • Storage and Work Tanks • Cooling Tower • Fugitive Sources 	1 Fiber Bed/Coalescing Filter 2 Candle Filters	Retort 1 - 1994 Retort 2 - 1994 Retort 3 - 1995 Retort 4 - 1996
EU-2	Evaporator System	None	2024
B-1	Backup Boiler (14.7 MMBtu/hr) – Gas-Fired with No. 2 Fuel Oil Backup	None	1995
B-2	Primary Boiler (16.8 MMBtu/hr) – Gas-Fired Only	None	2023
AIA	Aggregate Insignificant Activities – Unpaved Roads	Water application	NA

Oil-based Wood Preserving (EU-1)

7. The facility operates a wood preserving process. Wood is treated under pressure in a closed cylindrical vessel retort by forcing chemical preservatives deep into the cells of the wood. This facility operates four (4) retorts. As part of the preservation process, the facility operates chemical storage tanks, work tanks, and a process water cooling tower. The facility currently uses DCOI (Dichloro-octyl-isothiazolinone), copper naphthenate (CuNap), and a carrier oil (high flash No. 2 diesel fuel) for wood preservatives. The facility no longer uses pentachlorophenol. VOC emission

- estimates for this process were provided by the facility in support of the review report for the Standard ACDP renewal.
8. After the treatment is complete, any steam pressure relief and fresh air exchange prior to the doors opening is exhausted through fiber bed filters which reduces particulate matter emissions and allows for material reclamation. The fiber bed filters are also referred to by the facility as a coalescing filter. This air exchange flow terminates in a vent tank with a single candle filter on the exhaust.
 9. The facility also uses a vacuum pump system that operates continuously to route vapors from the treatment process, including work tanks, to a vacuum vent tank with double candle filtration on the exhaust.
 10. The air exchange fiber bed filter/coalescing filter, air exchange candle filter, and vacuum vent candle filters are designed to catch aerosolized droplets and reclaim them. However, the facility does not assume any control efficiency in estimating emissions from the treatment process.

Evaporator System (EU-2)

11. A settling tank, oil-water separator, and an evaporator (fabricated by Quality Tanks) make up the process water treatment system. The evaporator is estimated to be capable of evaporating 10,000 gallons per day of process water when operating at 213 °F. The emissions from EU-2 are based on the facility operating the evaporator for 24 hours per day, 365 days per year for a total of 3,650,000 gallons per year.

Backup 14.7 MMBtu/hr Natural Gas Boiler with Fuel Oil Backup (B-1)

12. The facility currently uses one (1) 14.7 MMBtu/hr boiler (B-1) installed in 1995 as a backup boiler to provide steam for the wood treatment operations when the primary boiler (B-2) is inoperable. This backup boiler has been classed under 40 CFR 63 subpart JJJJJJ (6J) as meeting the definition of a gas-fired boiler. As such, the PTE of this boiler has been calculated assuming only 48 hours of fuel oil use. The requirements related to the use of fuel oil under 40 CFR 63 subpart 6J are no longer applicable. The criteria pollutant emissions from this source are based on emission factors derived from DEQ AQ-EF05 – Emission Factors Gas Fired Boilers, DEQ AQ-EF04 – Emission Factors Oil Fired Boilers, and US EPA 40 CFR 98, Tables C-1 and C-2. The federal HAP or CAO TAC emissions from this source are based on emission factors from DEQ's 2023 Air Toxics Emission Inventory Combustion Emission Factor Tool.

Primary 16.28 MMBtu/hr Natural Gas Boiler (B-2)

13. The facility currently uses one (1) 16.28 MMBtu/hr boiler (B-2) installed in 2023 to provide steam for the wood treatment operations. The criteria pollutant emissions from this source are based on emission factors derived from DEQ AQ-EF05 – Emission Factors Gas Fired Boilers and US EPA 40 CFR 98, Tables C-1 and C-2. The federal HAP or CAO TAC emissions from this source are based on emission factors from DEQ's 2023 Air Toxics Emission Inventory Combustion Emission Factor Tool.

Production Limitations

14. The facility is limited to treating no more than 6,000,000 cubic feet per year and no more than 2,400 charges per year. Compliance will be based on recordkeeping.
15. The facility is limited to no more than two (2) retort door openings in any 60-minute period. This limitation is to prevent a sudden emission level that may result in odor complaints. This requirement is not based on past odor complaints, but rather the potential for future odor complaints. Compliance will be based on recordkeeping.

Nuisance Emission Limitations

16. Under LRAPA 49-010(1), the permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.
17. Under LRAPA 32-090(1), the permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination is to be made by LRAPA. Compliance is demonstrated through documentation of all complaints received by the facility from the general public and following procedures to notify LRAPA of receipt of these complaints.

General Emission Limitations

18. Under LRAPA 48-015(1), 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. Compliance is demonstrated through a fugitive emissions survey performed at least quarterly and taking the reasonable precautions listed under LRAPA 48-015(1).
19. EU-1 and EU-2 are subject to the visible emission limitations under LRAPA 32-010. These emission units must not have visible emissions equal to or greater than 20% opacity measured as a six-minute block average. Compliance is demonstrated through a visible emissions survey performed at least quarterly.
20. Emission Unit B-1 is subject to particulate matter emission limitations under LRAPA 32-030(1)(b). For combustion sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015, for which there are no representative compliance source test results prior to April 16, 2015, the permittee must not cause, suffer, allow, or permit particulate matter emissions in excess of 0.14 grains per dry standard cubic foot. Compliance is demonstrated through a visible emissions survey performed at least quarterly.
21. Emission Unit B-2 is subject to particulate matter emission limitations under LRAPA 32-030(2). For sources installed, constructed, or modified after April 16, 2015, the particulate matter emission limit is 0.10 grains per dry standard cubic foot. Compliance is demonstrated through a visible emissions survey performed at least quarterly.
22. LRAPA 32-008(2) requires new units installed or existing emission units modified on or after January 1, 1994, meet TACT if the emission unit meets the following criteria: The emission unit is not subject to Major NSR in title 38, Type A State NSR in LRAPA title 38, an applicable Standard of Performance for New Stationary Sources in title 46, or any other standard applicable only to new or modified sources in title 30, title 33, title 39, or title 46 for the regulated pollutant emitted; the source is required to have a permit; if new, the emission unit has emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; if modified, the emission unit would have an increase in emissions of any criteria pollutant equal to or greater than one (1) ton per year of any criteria pollutant; and LRAPA determines that the proposed air pollution control devices and emission reduction processes do not represent TACT.
 - 22.a. Each retort in Emission Unit EU-1 does have potential gaseous pollutant emissions that are equal to or greater than one (1) ton per year for VOCs. While LRAPA has not performed a formal TACT determination for VOCs, LRAPA has determined that controls are not typically used for these emission units at the calculated potential emission rates. Current operations likely meet TACT.

- 22.b. Emission Units B-1 and B-2 are subject to 40 CFR 60 subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units. As such, these emission units are not required to meet TACT.
- 22.c. Emission Unit EU-2 does not have potential gaseous pollutant emissions that are equal to or greater than one (1) ton per year for any criteria pollutant and as such this emission unit is not required to meet TACT.

New Source Performance Standards (NSPS)

- 23. Emission Unit B-1 is subject to 40 CFR 60 subpart Dc - 40 CFR 60 subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units because this emission unit is a steam generating unit for which construction commenced after June 9, 1989, and the emission unit has a maximum design heat input of 100 MMBtu per hour or less, but greater than or equal to 10 MMBtu per hour.
- 24. The 40 CFR 60 subpart Dc requirements that are applicable to Emission Unit B-1 are identified in the following table:

40 CFR 60 subpart Dc Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.40c	Applicability and delegation of authority	Yes	The boiler has a maximum heat input capacity between 10 and 100 MMBtu per hour.	NA
60.41c	Definitions	Yes	The boiler meets the definition of a <i>steam generating unit</i> .	NA
60.42c	Standards for sulfur dioxide (SO ₂)	Yes	The facility elected to limit the sulfur weight percent of the fuel oil.	18,19
60.43c	Standard for particulate matter (PM)	No	None.	NA
60.44c	Compliance and performance test methods and procedures for sulfur dioxide	Yes	None.	NA
60.45c	Compliance and performance test methods and procedures for particulate matter	No	None.	NA
60.46c	Emission monitoring for sulfur dioxide	No	None.	NA
60.47c	Emission monitoring for particulate matter	No	None.	NA
60.48c	Reporting and recordkeeping requirements	Yes	Under the authority of 40 CFR 60.19(c), LRAPA has moved the postmark deadlines to align with the February 15 reporting.	21-25

- 25. Emission Unit B-2 is subject to 40 CFR 60 subpart Dc - 40 CFR 60 subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units because this emission unit is a steam generating unit for which construction commenced after June 9, 1989, and

the emission unit has a maximum design heat input of 100 MMBtu per hour or less, but greater than or equal to 10 MMBtu per hour.

26. The 40 CFR 60 subpart Dc requirements that are applicable to Emission Unit B-2 are identified in the following table:

40 CFR 60 subpart Dc Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
60.40c	Applicability and delegation of authority	Yes	The boiler has a maximum heat input capacity between 10 and 100 MMBtu per hour.	NA
60.41c	Definitions	Yes	The boiler meets the definition of a <i>steam generating unit</i> .	NA
60.42c	Standards for sulfur dioxide (SO ₂)	No	None.	NA
60.43c	Standard for particulate matter (PM)	No	None.	NA
60.44c	Compliance and performance test methods and procedures for sulfur dioxide	No	None.	NA
60.45c	Compliance and performance test methods and procedures for particulate matter	No	None.	NA
60.46c	Emission monitoring for sulfur dioxide	No	None.	NA
60.47c	Emission monitoring for particulate matter	No	None.	NA
60.48c	Reporting and recordkeeping requirements	Yes	Maintain records of the monthly usage of natural gas by the boiler.	24,25

National Emission Standards for Hazardous Air Pollutants (NESHAP)

27. Emission Unit B-1 has been classified under 40 CFR 63 subpart 6J – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources. A boiler that meets the definition of a gas fired boiler under 40 CFR 63.11237 is not subject to this NESHAP under 40 CFR 63.11195(e). The PTE of this boiler has been calculated assuming only 48 hours of fuel oil use and requirements related to the use of fuel oil under 40 CFR 63 subpart 6J have been removed from the permit due to them not being applicable. No other regulatory changes result from the reclass of the boiler.
28. Emission Unit B-2 is not subject to 40 CFR 63 subpart 6J – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources because this emission unit is a gas fired boiler. Unlike Emission Unit B-1, Emission Unit B-2 will not have the ability to combust fuel oil. A boiler that meets the definition of a gas fired boiler under 40 CFR 63.11237 is not subject to this NESHAP under 40 CFR 63.11195(e).

29. Emission Unit EU-1 is subject to 40 CFR 63 subpart QQQQQQ (6Q) – National Emission Standards for Wood Preserving Area Sources because the facility is a wood preserving operation as defined under 40 CFR 63.11433 that is an area source of hazardous air pollutant emissions. The facility uses DCOI and copper naphthenate as wood preservatives. The facility no longer uses pentachlorophenol. The facility is subject to 40 CFR 63 subpart 6Q as an existing source under the regulation. No further requirements apply under this NESHAP. The facility will be required to maintain documentation that the wood preservatives used at the facility do not contain the hazardous air pollutants of concern.
30. The 40 CFR 63 subpart 6Q requirements that are applicable to Emission Unit EU-1 are identified in the following table:

40 CFR 63 subpart 6Q Citation	Description	Applicable to Source (Yes/No)	Comments	Permit Condition
63.11428	Applicability	Yes	None.	NA
63.11429	Compliance Dates	Yes	None.	NA
63.11430	Standards	Yes	Facility does not use wood preservative containing chromium, arsenic, dioxins, or methylene chloride	27
63.11432	General Provisions	No	None.	NA
63.11433	Definitions	Yes	None.	NA
63.11434	Implement and enforcement	Yes	None.	NA

Plant Site Emission Limits (PSELs)

31. Provided below is a summary of the baseline emissions rate, netting basis, plant site emission limit, and potential-to-emit:

Pollutant	Baseline Emission Rate (TPY)	Netting Basis		Plant Site Emission Limit (PSEL)		PTE (TPY)
		Previous (TPY)	Proposed (TPY)	Previous PSEL (TPY)	Proposed PSEL (TPY)	
PM	2.8	2.8	2.8	24	1.0	1.0
PM ₁₀	1.1	1.1	1.1	14	1.0	1.0
PM _{2.5}	NA	1.1	1.1	9	1.0	1.0
CO	0.3	0.3	0.3	99	13	13
NO _x	1.4	1.4	1.4	39	11	11
SO ₂	0.1	0.1	0.1	39	de minimis	0.41
VOC	20.2	20.2	20.2	59	7.4	7.4
GHG (CO ₂ eq)	2,823	2,823	2,823	74,000	15,906	15,906

32. The baseline emission rates for PM, PM₁₀, CO, NO_x, SO₂ and VOC were determined in previous permitting actions and there have been no changes. A baseline emission rate is not established for PM_{2.5} in accordance with LRAPA 42-0048(3). The facility baseline for GHGs is based upon actual emissions from the 2004 calendar year.
33. The netting basis is equal to the baseline emission rate for all pollutants. The facility has not had any emission increases approved for any of the reasons listed under LRAPA 42-0046(3)(e). The PM_{2.5} netting basis was established as being equivalent to the PM₁₀ netting basis using the

procedures under LRAPA 42-0046(2)(b). The fraction of PM₁₀ in the netting basis that is PM_{2.5} is assumed to be 100%.

34. In accordance with LRAPA 42-0041(2), the PSEL for all pollutants emitted above de minimis are set equal to the sources potential-to-emit (PTE) for that pollutant. PSELs are not set for SO₂ in accordance with LRAPA 42-0020(3)(a) because this pollutant is emitted at no more than the de minimis as defined in LRAPA title 12.

Significant Emission Rate

35. The PSEL increase over the netting basis is less than the Significant Emission Rate (SER) as defined in LRAPA title 12 for all pollutants.

Pollutant	Proposed PSEL (TPY)	PSEL Increase Over Netting Basis (TPY)	PSEL Increase Due to Utilizing Existing Baseline Period Capacity (TPY)	PSEL Increase Due to Modification (TPY)	SER (TPY)
PM	1.0	0	NA	NA	25
PM ₁₀	1.0	0	NA	NA	15
PM _{2.5}	1.0	0	NA	NA	10
CO	13	12.7	NA	NA	100
NO _x	11	9.6	NA	NA	40
SO ₂	NA	NA	NA	NA	40
VOC	7.4	0	NA	NA	40
GHGs	15,906	13,083	NA	NA	75,000

Unassigned Emissions and Emission Reduction Credits

36. The facility has unassigned emissions as shown in the table below. Unassigned emissions are equal to the netting basis minus the source's current PTE, minus any banked emission reduction credits. The facility has zero (0) tons of emission reduction credits. In accordance with LRAPA 42-0055 the maximum unassigned emissions may not be more than the SER.

Pollutant	Proposed Netting Basis (TPY)	PTE (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credits (TPY)	SER (TPY)
PM	2.8	1.0	1.8	0	25
PM ₁₀	1.1	1.0	0.7	0	15
PM _{2.5}	1.1	1.0	0.8	0	10
CO	0.3	13	0	0	100
NO _x	1.4	11	0	0	40
SO ₂	0.1	NA	0	0	40
VOC	20.2	7.4	12.8	0	40
GHGs	2,823	15,906	0	0	75,000

New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

37. This source is located in an area that is designated attainment or unclassified for all regulated pollutants other than CO and PM₁₀. For pollutants other than CO and PM₁₀, the proposed PSELs are less than the federal major source threshold for non-listed sources of 250 TPY per regulated pollutant and are not subject to Major NSR. For CO and PM₁₀, the source is located in a

maintenance area. The proposed PSEs for CO and PM₁₀ are less than the 100 TPY threshold that determines the applicability of Major NSR in a maintenance area.

Type A and Type B State NSR

38. For all NSR regulated pollutants the proposed modification will not have emissions per regulated pollutant equal to or greater than the SER over the netting basis that would require Type A or B State NSR.

Federal Hazardous Air Pollutants/Toxic Air Contaminants

39. Potential annual federal hazardous air pollutant emissions (FHAP) are based on the potential to emit of the facility operating under permit limitations. Naphthalene has the highest single FHAP emissions at 1.0E-01 tons per year. The potential total FHAP emissions are 0.12 tons per year. A major source of FHAPs is defined as having potential FHAP emissions of at least 10 tons per year of any single HAP and 25 tons per year of the aggregate of all FHAPs. This facility does not have potential FHAP emissions exceeding these thresholds and is considered a minor or area source of FHAPs.
40. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and, therefore, is not yet required to perform a risk assessment or report annual emissions of toxic air contaminants. LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants (TAC) that have Risk Based Concentrations established in rule. All FHAPs are on the list of approximately 600 TACs. The FHAPs and TACs listed below are based upon safety data sheets and standard emission factors for the types of emission units at this facility. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their TACs. Until then, this source will be required to report TAC emissions triennially.
41. The table below represents the potential emissions of federal HAPs/TACs from this facility assuming operation at the permit allowable limitations:

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
Organics				
75-07-0	Acetaldehyde	1.3E-03	Yes	Yes
107-02-8	Acrolein	1.3E-03	Yes	Yes
71-43-2	Benzene	7.8E-04	Yes	Yes
106-99-0	1,3-Butadiene	3.8E-05	Yes	Yes
100-41-4	Ethyl Benzene	9.1E-04	Yes	Yes
50-00-0	Formaldehyde	2.5E-03	Yes	Yes
110-54-3	Hexane	6.2E-04	Yes	Yes
91-20-3	Naphthalene	1.0E-01	Yes	Yes
NA	POM (inc. PAHs)	1.3E-04	Yes	Yes
115-07-1	Propylene	7.0E-02	No	Yes
108-88-3	Toluene	3.5E-03	Yes	Yes
1330-20-7	Xylenes	2.6E-03	Yes	Yes
Inorganic Gases				
7664-41-7	Ammonia	4.3E-01	No	Yes
7647-01-0	Hydrochloric Acid	4.8E-04	Yes	Yes
Metals				
7440-38-2	Arsenic	3.0E-05	Yes	Yes
7440-41-7	Beryllium	1.6E-06	Yes	Yes

CAS Number	Pollutant	PTE (TPY)	FHAP	CAO TAC
7440-43-9	Cadmium	1.5E-04	Yes	Yes
7440-47-3	Chromium, Hexavalent	7.6E-06	Yes	Yes
7440-50-8	Copper	1.0E-05	No	Yes
7439-92-1	Lead Compounds	2.1E-05	No	Yes
7439-96-5	Manganese	5.8E-05	Yes	Yes
7439-97-6	Mercury	3.9E-05	Yes	Yes
7440-02-0	Nickel	2.9E-04	Yes	Yes
7782-49-2	Selenium	8.8E-06	Yes	Yes
Total (TPY) =		0.62	0.12	0.62

Toxic Release Inventory

42. The Toxics Release Inventory (TRI) is a federal program that tracks the management of certain toxic chemicals that may pose a threat to human health and the environment. It is a resource for learning about toxic chemical releases and pollution prevention activities reported by certain industrial facilities. Section 313 of the Emergency Planning and Community Right-to-Know Act (EPCRA) created the TRI Program. In general, chemicals covered by the TRI Program are those that cause:

- Cancer or other chronic human health effects;
- Significant adverse acute human health effects; or
- Significant adverse environmental effects.

There are currently over 650 chemicals covered by the TRI Program. Facilities that manufacture, process or otherwise use these chemicals in amounts above established levels must submit annual TRI reports on each chemical. NOTE: The TRI Program is a federal program over which LRAPA has no regulatory authority. LRAPA does not guarantee the accuracy of any information copied from EPA's TRI website.

In order to report emissions to the TRI program, a facility must operate under a reportable NAICS code, meet a minimum employee threshold, and manufacture, process, or otherwise use chemicals in excess of the applicable reporting threshold for the chemical. For calendar year 2023, this facility reported the emissions of the following chemicals to the air:

Chemical Name	CAS Number	Fugitive Release (pounds)	Stack Release (pounds)	Total (pounds)
Dioxin and dioxin like compounds	TRI ID: N150	0.0002443	--	0.0002443
Pentachlorophenol	87-86-5	2	3	5
Polycyclic aromatic hydrocarbons	TRI ID: N590	0.2	0.2	0.4

NOTE: In 2022, the facility ceased using pentachlorophenol, which is the primary source of the dioxin emissions reported to TRI.

Compliance History

43. This facility is regularly inspected by LRAPA and occasionally by other regulatory agencies. The following table indicates the inspection history of this facility since 1993:

Type of Inspection	Date	Results
LRAPA - Full Compliance Evaluation	07/21/1993	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	12/09/1994	No areas of non-compliance discovered

Type of Inspection	Date	Results
LRAPA - Full Compliance Evaluation	06/20/1995	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	11/22/1996	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	09/25/1997	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	03/30/1998	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	04/18/2003	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	05/01/2008	No areas of non-compliance discovered
LRAPA - Full Compliance Evaluation	04/24/2013	No areas of non-compliance discovered
LRAPA – Informational Inspection	12/16/2024	No areas of non-compliance discovered

44. LRAPA has not initiated any enforcement actions against this facility since 1993.

Performance Test Results

45. The facility is not required to conduct performance testing. LRAPA is not aware of any performance testing conducted at this facility.

Recordkeeping Requirements

46. The permittee must keep and maintain records for a period of at least five (5) years from the date of entry of the following information:

Activity	Units	Minimum Recording Frequency
PSEL and Production Limitation Recordkeeping		
Production of treated wood.	Cubic feet	Monthly and 12-month rolling
Date and time of retort door openings.	NA	Per Opening
Number of retort charges.	NA	Monthly and 12-month rolling
Name, type and quantity used for all chemicals used in the wood treatment process.	NA	Annually
Current Safety Data Sheet, or equivalent material content certification, for all chemicals used in the wood treatment process	NA	Annually
The amount of natural gas combusted by each boiler.	Therms or MMCF	Monthly
The amount of fuel oil combusted by Emission Unit B-1 according to Condition 23.	Gallons	Monthly
Hours of operation of Emission Unit EU-2, Evaporator System.	Hours	Monthly and 12-month rolling
General Recordkeeping		
Log of nuisance complaints according to Condition G11.	NA	Upon receipt of complaint
Documentation of all fugitive emission surveys and corrective actions, as applicable	NA	Quarterly
Documentation of all visible emission surveys and corrective actions, as applicable	NA	Quarterly
Operation and Maintenance Plan according to Condition 17.	NA	Maintain the current version on-site

Activity	Units	Minimum Recording Frequency
Upset Log of all planned and unplanned excess emissions	NA	Per occurrence
40 CFR 60 Subpart Dc Recordkeeping		
The amount of natural gas combusted by each boiler.	Therms or MMCF	Monthly
The amount of fuel oil combusted by Emission Unit B-1.	Gallons	Monthly
Fuel oil supplier certifications for Emission Unit B-1.	NA	Each delivery of fuel oil
40 CFR 63 Subpart 6J Recordkeeping		
Total monthly and calendar year hours that the Emission Unit B-1 combusted fuel oil.	Hours	Monthly and calendar year
40 CFR 63 Subpart 6Q Recordkeeping		
Documentation that each wood preservative used does not use any chromium, arsenic, dioxins, or methylene chloride.	NA	Maintain the current version on-site

Reporting Requirements

47. The facility must submit to LRAPA the following reports by no later than the dates indicated in the table below:

Report	Reporting Period	Due Date
Semiannual fuel oil report as required by 40 CFR 60 subpart Dc for Emission Unit B-1, according to conditions 21 and 22.	Semiannual	Postmarked by February 15, August 15
Log of all excess emissions which occurred during the reporting period, according to Condition G14.	Annual	February 15
PSEL pollutant emissions as calculated according to Conditions 5 and 6, including supporting calculations and emission unit throughputs.	Annual	February 15
Name, type and quantity used for all chemicals used in the wood treatment process.	Annual	February 15
Hours of operation of Emission Unit EU-2, Evaporator System.	Annual	February 15
GHG Report, if required by Condition 30.	Annual	March 31

Public Notice

48. The draft permit and review report were on public notice from October 21, 2025 to November 25, 2025. During the public comment period, two comments were received from the public. After the public comment period ended, LRAPA responded to each comment and has taken action to issue the permit without changes.

Public Comment Summary and LRAPA Responses

[All public comments that were received for this project are a public record and are retained with the public permit review files. For purposes of this summary document, the public comments may have been edited to reduce length or consolidated with similar comments. Public comments that are not related to the review report or draft permit, such as those comments that are statements of fact or express an opinion, are not presented in this document, and do not require a response from LRAPA.]

Comments 1-2: *Both commenters expressed general disapproval.*

Response 1-2: LRAPA appreciates the commenters' concern for good air quality. LRAPA is obligated to issue air permits to facilities that meet all applicable air regulations.

Because the commenters did not express specific concerns regarding the facility's permit, LRAPA has not made any changes to the permit.

Public Comment Receipt Log

Written comments were received from:

Lin Woodrich abclinwoodrich@gmail.com	Suzanne Geraci infiniteawareness@comcast.net
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Stella-Jones Eugene - 205108								
Emission Detail Sheets								
Facility Potential Emissions Summary								
Criteria Pollutant Emissions								
PM (TPY)	PM10 (TPY)	PM2.5 (TPY)	NO _x (TPY)	CO (TPY)	SO ₂ (TPY)	VOC (TPY)	GHGs (TPY)	
0.64	0.43	0.34	11	13	0.41	7.4	15,906	
FHAP/TAC Emissions								
Pollutant			Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic			
Organics								
Acetaldehyde			1.3E-03	Yes	Yes			
Acrolein			1.3E-03	Yes	Yes			
Benzene			7.8E-04	Yes	Yes			
1,3-Butadiene			3.8E-05	Yes	Yes			
Ethyl Benzene			9.1E-04	Yes	Yes			
Formaldehyde			2.5E-03	Yes	Yes			
Hexane			6.2E-04	Yes	Yes			
Naphthalene			1.0E-01	Yes	Yes			
PAHs			1.3E-04	Yes	Yes			
Propylene			7.0E-02	No	Yes			
Toluene			3.5E-03	Yes	Yes			
Xylenes			2.6E-03	Yes	Yes			
Inorganic Gases								
Ammonia			4.3E-01	No	Yes			
Hydrochloric Acid			4.8E-04	Yes	Yes			
Metals								
Arsenic			3.0E-05	Yes	Yes			
Beryllium			1.6E-06	Yes	Yes			
Cadmium			1.5E-04	Yes	Yes			
Chromium, Hexavalent			7.6E-06	Yes	Yes			
Copper			1.0E-05	No	Yes			
Lead Compounds			2.1E-05	No	Yes			
Manganese			5.8E-05	Yes	Yes			
Mercury			3.9E-05	Yes	Yes			
Nickel			2.9E-04	Yes	Yes			
Selenium			8.8E-06	Yes	Yes			
Total Emissions (TPY) =			6.18E-01	1.2E-01	6.2E-01			
Max Individual FHAP (TPY) =			1.0E-01					

Stella-Jones Eugene - 205108
Emission Detail Sheets
Boiler Emission Calculations

Boiler Specifications

Max Heat Input	16.28	MMBtu/hr
Heat Value - Natural Gas	1026	MMBtu/MMCF
Max Hrs Operation	8760	hr/yr

Criteria Pollutants

Pollutant	NG Emission Factor (lb/MMCF)	NG EF Units	Potential Annual Emissions (TPY)
PM	2.5	lb/MMCF	0.17
PM10	2.5	lb/MMCF	0.17
PM2.5	2.5	lb/MMCF	0.17
Carbon Monoxide	84	lb/MMCF	5.84
Nitrogen Oxides	100	lb/MMCF	6.95
Sulfur Dioxide	1.7	lb/MMCF	0.12
VOCs	5.5	lb/MMCF	0.38
GHGs (CO ₂ equiv.)	117	lb/MMBtu	8,350

FHAP/TAC Emissions

Pollutant	NG Emission Factor (lb/MMCF)	Potential Annual Emissions (TPY)	Federal HAP	CAO Air Toxic
Organics				
Acetaldehyde	0.0031	2.15E-04	Yes	Yes
Acrolein	0.0027	1.88E-04	Yes	Yes
Benzene	0.0058	4.03E-04	Yes	Yes
Ethyl Benzene	0.0069	4.80E-04	Yes	Yes
Formaldehyde	0.0123	8.55E-04	Yes	Yes
Hexane	0.0046	3.20E-04	Yes	Yes
Naphthalene	0.0003	2.08E-05	Yes	Yes
Polycyclic Aromatic Hydrocarbons (PAHs)	0.0001	6.95E-06	Yes	Yes
Propylene	0.5300	3.68E-02	No	Yes
Toluene	0.0265	1.84E-03	Yes	Yes
Xylene (mixture), including	0.0197	1.37E-03	Yes	Yes
Inorganic Gases				
Ammonia	3.2000	2.2E-01	No	Yes
Metals				
Arsenic	0.0002	1.4E-05	Yes	Yes
Beryllium	0.000012	8.3E-07	Yes	Yes
Cadmium	0.0011	7.6E-05	Yes	Yes
Chromium, Hexavalent	0.000056	3.9E-06	Yes	Yes
Manganese	0.00038	2.6E-05	Yes	Yes
Mercury	0.00026	1.8E-05	Yes	Yes
Nickel	0.0021	1.5E-04	Yes	Yes
Selenium	0.000024	1.7E-06	Yes	Yes
Total Emissions =		2.65E-01	6.0E-03	2.7E-01

GHG-Related Emission Factors

Pollutant	Natural Gas (kg/MMBtu)	(global warming potential) GWP
Carbon Dioxide (CO ₂)	53.06	1
Methane (CH ₄)	1.0E-03	28
Nitrous Oxide (N ₂ O)	1.0E-04	265

Notes:

PM/PM₁₀/PM_{2.5}, SO₂, NO_x, CO and VOC emissions factors are based on DEQ Emission Factors Gas Fired Boilers, AQ-EF05 (08/01/2011)

GHG emission factors are from 40 CFR 98, Tables C-1 and C-2

Toxics emission factors from DEQ 2023 Air Toxics Emission Inventory Combustion Emission Factor Tool

Chromium assumed to be hexavalent

Stella-Jones Eugene - 205108

Emission Detail Sheets

Wood Preservation Emission Calculations

Treatment Plant Details

Total Wood Treated = 6,000,000 cubic feet/year

Total Preservative Used = 5,100,000 gal/year

Totals below each calculated using the total wood and preservative used amounts

DCOI** Treatment

Pollutant	EF	PTE (TPY)
VOC	Material Balance*	6.65
Naphthalene	Material Balance*	0.039

from EUG DCOI 2020 doc provided by Stella-Jones

Includes treating cylinders, work tanks and storage tanks. Other sources not included.

**Dichloro-octyl-isothiazolinone (4,5-Dichloro-2-n-octyl-4-isothiazolin-3-one, CAS # 64359-81-2)

Naphthalene is from the fuel/carrier oil. SDS listed as "less than 1%".

Copper Napthenate (CuNap) Treatment

Pollutant	EF	PTE (TPY)
VOC	Material Balance*	5.6
Naphthalene	Material Balance*	0.033

Includes treating cylinders, work tanks and storage tanks. Other sources not included.

Naphthalene is from the fuel/carrier oil. SDS listed as "less than 1%".

*All emissions are from the facility's emission estimation tools/software/workshseets

and are based on EPA AP-42 Chapter 7, Liquid Storage Tanks and the use of liquid mass fractions to estimate the vapor mass fraction

Fugitive emissions from treated storage have not been included in the emission estimates.

Emission Factor (VOC)	
0.00222	lb/cubic feet

EF is derived from the total PTE for VOC from DCOI treatment (6.7 tons/year), divided by the total wood treated (6 million cu. ft./year)

Stella-Jones Eugene - 205108

Emission Detail Sheets

Unpaved Road Emission Calculations

VMT and Unpaved Roads

Insignificant Emission Unit - Unpaved Roads

PM 0.30 tons/year

PM10 0.09 tons/year

PM2.5 0.01 tons/year

Vehicles VMT/year vehicle miles traveled

Trucks 500 Update based on facility estimation

Unpaved Road Dust Emission Factor Calculation--AP-42 13.2.2 11/06

VMT - Loaders

weight in tons

	k (lb/VMT)	s(%)	C	a	b	W	E (uncorrected)	E (Corrected)*
PM-30	4.9	4.0	0.00047	1.0	0.45	5.0	2.06	1.21
PM10	1.5	4.0	0.00047	1.0	0.45	5.0	0.63	0.37
PM2.5	0.2	4.0	0.00036	1.0	0.45	5.0	0.06	0.04

*Corrected for number of days with at least 0.254 mm of precipitation per year, P =150 based on Figure 13.2.2-1

Stella-Jones Eugene - 205108		
Emission Detail Sheets		
Steam-heated Evaporator System Emission Calculations		
	3,650,000 gal/year - max daily rate at 365 days/year	
	13816746.5 Liters/yr evaporated	
	10000 gal/day at 24 hours per day of operation	
VOLATILES	VOC**	VOC EF
Water Concentration (mg/L)*		
Air Emissions (lb/yr)	129.12	0.00003538 (lb/gal)
Air Emissions (lb/day)		0.01 (lb/hour)
SEMIVOLATILES (PAHs)	Naphthalene	
Water Concentration (ug/L)*		
Air Emissions (lb/yr)	129	
Air Emissions (lb/day)		
Air Emissions (TPY)	0.06	