

LANE REGIONAL AIR PROTECTION AGENCY TITLE V OPERATING PERMIT

1010 Main Street Springfield, OR 97477 Telephone (541) 736-1056

Issued in accordance with the provisions of ORS 468A.040 and based on the land use compatibility findings included in the permit record.

ISSUED TO:

INFORMATION RELIED UPON:

Rosboro Company, LLC - Springfield Facility

P.O. Box 20

Springfield, Oregon 97477

Application: 70265

Received: February 6, 2024

PLANT SITE LOCATION:

LAND USE COMPATIBILITY STATEMENT:

2509 Main Street

Springfield, Oregon 97477

From: City of Springfield Dated: September 6, 1995

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Travis Knudsen, Executive Director

May 8, 2025

Effective Date

Nature of Business:	SIC	<u>NAICS</u>
Laminated Beam Manufacturing	2439	321213
	2421	321113
	4961	221330

RESPONSIBLE OFFICIAL:

FACILITY CONTACT PERSON:

Name:

James Monson Daniels

Title:

VP of Operations

Title:

Environmental Supervisor

Phone:

(541) 736 2146

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

A CDD	A' Contaniant Distance Book's	NICDC	N C D C C 1 - 1
ACDP	Air Contaminant Discharge Permit	NSPS	New Source Performance Standards
AQMA	Air Quality Management Area	NSR	New Source Review
Act ASTM	Federal Clean Air Act	O_2	Oxygen
ASTM	American Society of Testing and	OAR	Oregon Administrative Rules
Des	Materials	ODEQ	Oregon Department of Environmental
Btu	British thermal unit	OPP	Quality
CAM	Compliance Assurance Monitoring	OPR	Operation
CAO	Cleaner Air Oregon	ORS	Oregon Revised Statutes
CEMS	Continuous Emissions Monitoring	O&M	Operation and maintenance
CTP.	System	Pb	Lead
CFR	Code of Federal Regulations	PCD	Pollution Control Device
CI	Compression Ignition	PM	Particulate matter
CMS	Continuous Monitoring System	$PM_{2.5}$	Particulate matter less than 2.5
CO	Carbon Monoxide		microns in size
CO_2	Carbon dioxide	PM_{10}	Particulate matter less than 10
CO_2e	Carbon dioxide equivalent		microns in size
COMS	Continuous Opacity Monitoring	ppm	Parts per million
	System	PSEL	Plant Site Emission Limit
CPDS	Certified Product Data Sheet	psia	pounds per square inch, actual
CPMS	Continuous parameter monitoring	PTE	Potential to Emit
	system	QIP	Quality Improvement Plan
DEQ	Department of Environmental Quality	RICE	Reciprocating Internal Combustion
dscf	Dry standard cubic feet		Engine
EF	Emission factor	SACC	Semi-Annual Compliance
EPA	US Environmental Protection Agency		Certification
EU	Emissions Unit	SCEMP	Surrogate Compliance Emissions
FCAA	Federal Clean Air Act		Monitoring Parameter
FHAP	Federal Hazardous Air Pollutants as	Scf	Standard cubic foot
	defined by LRAPA title 12	SDS	Safety data sheet
ft^2	Square foot	SER	Significant emission rate
FSA	Fuel sampling and analysis	SERP	Source emissions reduction plan
GHG	Greenhouse Gas	SI	Spark Ignition
gr/dscf	Grain per dry standard cubic feet (1	SIC	Standard Industrial Code
	pound = 7000 grains)	SIP	State Implementation Plan
HCFC	Halogenated Chloro-Fluoro-Carbons	SO_2	Sulfur dioxide
Hr	Hour	ST	Source test
ID	Identification number or label	TAC	Toxic Air Contaminant
I&M	Inspection and maintenance	TACT	Typically Achievable Control
Lb	Pound		Technology
LRAPA	Lane Regional Air Protection Agency	TBI	To be installed
MACT	Maximum Achievable Control	TPY	Tons per year
	Technology	TSM	Total selected metals
MM	Million	VE	Visible emissions
MMBtu	Million British thermal units	VMT	Vehicle miles traveled
NA	Not applicable	VOC	Volatile organic compounds
NESHAP	National Emission Standards for	VHAP	Volatile hazardous air pollutant
·	Hazardous Air Pollutants	Year	A period consisting of any 12-
NO_x	Nitrogen oxides		consecutive calendar month
A	0		

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PERMITTED ACTIVITIES

- 1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and Conditions of this permit. [OAR 340-218-0010, 340-218-0120]
- 2. In accordance with OAR 340-218-0010, LRAPA is authorized to implement all Oregon Administrative Rules, divisions 218 and 220 which apply to sources subject to the Oregon rules as they pertain to Oregon Title V Operating Permit Program sources until such time as LRAPA adopts its own Title V Permit Program rules. [LRAPA 34-180]
- 3. All Conditions in this permit are federally enforceable except as noted below:
 - 3.a. Conditions 8, 9, 57 through 73, 110, and General Condition G5 and part of G9 (LRAPA Title 43) are only enforceable by DEQ and/or LRAPA, as applicable. [OAR 340-218-0060]

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

4. The emission units regulated by this permit are the following [OAR 340-218-0040(3)]

Emissions Unit and Pollution Control Device Identification

Emission s Unit ID	Emissions Unit Description	Installed /Last Modified	Primary Pollution Control Davids (PCD ID)	Installed/ Last Modified	Secondary Pollution Control Device (PCD ID)	Installed/ Last Modified
	Wood-fired Boiler #1	1939	Multiclone #1 (CD-01.1)	04/2000	NA	NA
EU-01	Wood-fired Boiler #2	1939	Multiclone #2 (CD-01.2)	11/2002	NA	NA
	Wood -fired Boiler #3	1939	Multiclone #3 (CD-01.3)	11/2002	NA	NA
EU-02	Plantsite Fugitives from Material Handling Activities	NA	None	NA	NA	NA
			Cyclone #2 (CD-03A.6)	12/2020	Baghouse #5 (CD-04B.1)	05/2002
			Cyclone #4 (CD-03A.1)	10/2005	Baghouse #5 (CD-04B.1)	05/2002
			Cyclone#16 (CD-03A.4)	<1978	Baghouse #26 (CD-04B.2)	1994
EII 02	Milling Antiquities	12/2023	Cyclone #17 (CD-03A.5)	<1978	NA	NA
EU-03 Milling Ac	Milling Activities		Cyclone #20 (CD-03A.3)	<1978	NA	NA
			Target Box (CD-03B.2)	2007	NA	NA
			Baghouse #18 (CD-04A.3)	1985	NA	NA
			Baghouse #26 (CD-04B.2)	1994	NA	NA
EU-05	VOC (not listed elsewhere) Paints, inks, sealers, adhesives, etc.	NA	None	NA	NA	NA
	Continuous Dry Kilns A, B, C, D	2024	None	NA	NA	NA
EU-08	Batch Dry Kiln E	10/2008	None	NA	NA	NA
	Batch Dry Kiln F, G	08/2017	None	NA	NA	NA
	Batch Dry Kiln H, I	02/2019	None	NA	NA	NA
AIA-1	Gasoline Dispensing Facility (GDF)	11/1992	Submerged fill and work practices	NA	NA	NA
AIA-2	Beam Wrap Saw	01/2004	Cyclone #6 (CD-03A.7)	01/2004	NA	NA

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GENERAL EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS

The following tables and Conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

Facility-Wide Requirements

Facility-Wide Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition
48-015(1)	5	Fugitive Emissions	Minimize	6	7
49-010(1)	8	Nuisance	Prohibited	11	11
32-055	9	PM>250 microns	No Fallout	11	11
32-090(1)	10	Nuisance	Prohibited	11	11
40 CFR part 68	12	Risk Management	Risk Management Plan	12	12

Fugitive Emissions

- 5. <u>Applicable Requirement</u>: 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)]
 - 5.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;
 - 5.b. Application of water, or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
 - 5.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;
 - 5.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - 5.e. Adequate containment during sandblasting or other similar operations; [LRAPA 48-015(1)(e)]
 - 5.f. The covering of moving open bodied trucks transporting materials likely to become airborne; and
 - 5.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
- 6. Monitoring Requirement: The permittee must demonstrate compliance with Condition 5 by conducting a fugitive emissions survey. At least once each quarter the permittee must visually survey the facility using EPA Method 22 or EPA Method 9 for any sources of fugitive emissions. If EPA Method 22 is used, the minimum observation period is 30 minutes. If EPA Method 9 is used, opacity must be measured as a six-minute block average. 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 person conducting EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions: [LRAPA 34-016(1), LRAPA 48-015(2)&(3), and OAR 340-218-0050(3)(a)]
 - 6.a. If sources of fugitive emissions are identified that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period, the permittee must immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 5. After taking corrective action, the permittee must conduct another

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- fugitive emissions survey using EPA Method 22 or EPA Method 9 within 24 hours of the previous fugitive emissions survey.
- 6.b. If the fugitive emissions survey performed within 24 hours of the previous fugitive emissions survey detects visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period, the permittee must immediately notify LRAPA. LRAPA may require the facility to develop and implement a Fugitive Emission Control Plan to prevent any visible emissions from leaving the plant site boundary.
- 7. Recordkeeping Requirement: The permittee must record the following information in a monitoring log pertaining to Condition 6 for all fugitive emission surveys: date, time, person or entity conducting the survey, any excess fugitive emissions observed, and any corrective actions taken. [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]

Nuisance Conditions

- 8. <u>Applicable Requirement</u>: The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)] This Condition is only enforceable by LRAPA.
- 9. <u>Applicable Requirement</u>: The permittee must not cause or permit the emission of any particulate matter which is greater than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This Condition is enforceable only by LRAPA.
- 10. <u>Applicable Requirement</u>: 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. [LRAPA 32-090(1)]
- 11. Monitoring and Recordkeeping Requirement: To demonstrate compliance with Conditions 8 through 10, the permittee must maintain a log of all complaints received by the responsible official or designated employees (written, received via telephone or facsimile). The log must also record permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the problem within two (2) working days of receiving the complaint or within such longer time as is reasonably necessary, not to exceed five (5) working days. If more than five (5) days are needed to resolve the problem, the permittee must notify LRAPA immediately upon making that determination. [OAR 340-218-0050(3)(a), and OAR 340-218-0050(3)(b)]

Accidental Release Prevention

12. <u>Applicable Requirement</u>: Should this stationary source become subject to the accidental release prevention regulations in 40 CFR part 68, the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10, and comply with the plan and all other applicable part 68 requirements. [40 CFR part 68]

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SIGNIFICANT EMISSION UNIT EMISSION LIMITS AND STANDARDS

Emission Unit EU-01 - Wood-fired Boilers

Emission Unit EU-01 Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition
32-010(2) & (3)	13, 20	Visible Emissions	20% opacity, 6-minute avg., <40% opacity during grate cleaning	16, 21	17, 21
32-020(1) & (3)	14	PM	0.15 gr/dscf @ 12% O ₂	14.a, 18	14.b, 19
32-045(1)]	15	PM	Process Weight Limit	18	19
32-007(1)(a)	22	PM	Work Practices - Biomass Fuel Only	24	24
32-008(1)	23	O_2	Emission Action Level - TACT	23	24
35-0120(1)	25	NO_X , CO	Emission Factor Verification	25	26
40 CFR 63 Subpart JJJJJJ	27	PM, NO _X , SO ₂ , CO, VOC, HAPs	General Compliance	29	29
40 CFR 63 Subpart JJJJJJ	28	НАР	Biennial Tune-Up & Energy Assessment	29	29

- 13. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Unit EU-01 (wood-fired boilers) that equal or exceed an average of 20 percent opacity except as allowed by Conditions 13.a and 13.b. When visual determination of opacity is required, opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(3)(a)]
 - 13.a. For wood-fired boilers installed, constructed or last modified prior to June 1, 1970, visible emissions may equal or exceed 20 percent opacity but may not equal or exceed 40 percent opacity, as the average of all six-minute blocks during grate cleaning operations provided the grate cleaning is performed in accordance with a grate cleaning plan approved by LRAPA; or [LRAPA 32-010(3)(c)(A)]
 - 13.b. LRAPA may approve, at the owner's or operator's request, a boiler specific limit greater than 20 percent opacity but not to equal or exceed 40 percent opacity based on the opacity measured during a source test that demonstrates compliance with subsection 32-020(2) and: [LRAPA 32-010(3)(c)(B)]
- 14. <u>Applicable Requirement:</u> For fuel burning equipment sources installed, constructed, or modified before June 1, 1970, except solid fuel burning devices that have been certified under OAR 340-262-0500, no person may cause, suffer, allow, or permit particulate matter emissions from any fuel burning equipment in excess of 0.15 grains per dry standard cubic foot if any representative compliance source test results collected prior to April 16, 2015 demonstrate that emissions greater than 0.080 grains per dry standard cubic foot. [LRAPA 32-020(1)(b)])
 - 14.a. <u>Testing Requirement:</u> Within eighteen (18) months of permit issuance, and every 5 years thereafter, the permittee must demonstrate compliance with the emission limitation in Condition 14 as required by Condition 96. [LRAPA 35-0120(1)]
 - 14.b. <u>Reporting Requirement:</u> The permittee must comply with the reporting requirements under Condition 95.e. [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]
- 15. <u>Applicable Requirement:</u> The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]

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16. Monitoring Requirement: To demonstrate compliance with Condition 13 the permittee must perform a visible emissions survey of Emission Unit EU-01. At least once a week, the permittee must visually survey the plant using EPA Method 22 or EPA Method 9 for any sources of visible emissions. If EPA Method 22 is used, the minimum observation period is 30 minutes. If EPA Method 9 is used, opacity must be measured as a six-minute block average. For the purposes of this Condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-180 and OAR 340-218-0050(3)(a)&(b)]

- 16.a. If visible emissions are observed using EPA Method 22 or EPA Method 9, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 or EPA Method 9 within 24 hours of the previous visible emissions survey.
- 16.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey detects visible emissions from the same source(s), the permittee is required to immediately contact LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance with Condition 13, no further action is required beyond the recordkeeping required in Condition 17. If the results of EPA Method 9 are not in compliance with Condition 13, the permittee must immediately contact LRAPA.
- 16.c. If the permittee is unable to conduct an EPA Method 9 test due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions (e.g., fog, heavy rain, or snow), the permittee must note such conditions on the visible emissions survey sheet for that process or emission point. The permittee must attempt to conduct the EPA Method 9 tests daily until a valid visible emissions survey is completed.
- 16.d. If 4 consecutive weeks of EPA Method 22 or EPA Method 9 test results are less than the standard in Condition 13, the monitoring frequency required by Condition 16 may be reduced to monthly.
- 16.e. If 4 consecutive months of EPA Method 22 or EPA Method 9 test results are less than the standard in Condition 13, the monitoring frequency required by Condition 16 may be reduced to quarterly.
- 17. <u>Recordkeeping Requirement:</u> The permittee must keep documentation of all visible emissions surveys required by Condition 16. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]
- 18. Monitoring Requirement: To demonstrate compliance with Condition 14 and 15 the permittee must exhaust the emissions from Emission Unit EU-01 (boilers) to multiclones CD-01.1, CD-01.2, and CD-01.3. The permittee must operate, maintain and calibrate monitoring devices for measuring the pressure drop across each multiclone used to control emissions from Emission Unit EU-01 (Boilers). The permittee must maintain the pressure drop across each multiclone between 0.1 and 8 inches of water column whenever the associated boiler in Emission Unit EU-01 is operating. The permittee may establish alternate operating parameter ranges or values with the approval of LRAPA using the procedures under OAR-340-218. [LRAPA 32-005(1), 32-007(1)(b), 34-016(1), 34-180 and OAR 340-218-0050(3)(a)]
 - 18.a. The following corrective actions are required for all deviations that are observed during regular inspections that show air pollution control equipment to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parametric monitoring range:
 - 18.a.i. If parametric monitoring shows deviations from the approved parametric monitoring range, the permittee must schedule corrective actions within 48 hours to return the air pollution control equipment to the highest reasonable efficiency and effectiveness.
 - 18.a.ii. Operating a multiclone when the pressure drop exceeds the parametric monitoring

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range listed in Condition 18 is not considered a violation of an emission limit. However, failure to take corrective action will be considered a violation of this permit.

- 18.b. At least semiannually, the permittee must inspect each multiclone for wear, plugging, abrasion, and integrity of the mechanical and ancillary systems.
- 19. <u>Recordkeeping Requirement:</u> The permittee must maintain a monitoring log for all multiclones associated with Emission Unit EU-01 which must include the following: [LRAPA 34-016(1)]
 - 19.a. At least once a week while Emissions Unit EU01 is operating, the permittee must measure and record the pressure drop, in inches of water column, across the multiclone.
 - 19.b. Records of any maintenance or corrective action necessary to return the multiclones to highest reasonable efficiency and effectiveness or return the multiclones to operating within the approved parametric monitoring range including: date, person or organization performing the maintenance or corrective action, and a summary of the maintenance performed or corrective action taken.
 - 19.c. Records for each inspection of the multiclones including: date, person or organization performing the inspection, a list of the items inspected, and the results of the inspection, including any maintenance or repairs performed as a result of the inspection.
- 20. <u>Applicable Requirement:</u> The permittee must conduct grate cleaning of the wood or biomass-fired boilers (EU-01) in accordance with the LRAPA-approved grate cleaning plan on file with LRAPA. The plan must be kept onsite and be made available upon request. The LRAPA-approved plan includes the following required elements: [LRAPA 32-010(3)(c)(A)]
 - 20.a. Expected frequency of grate cleaning;
 - 20.b. Frequency of EPA Method 9 tests during grate cleaning;
 - 20.c. Expected length of grate cleaning period; and
 - 20.d. Methods to minimize emissions during grate cleaning.
- 21. <u>Recordkeeping Requirement:</u> To demonstrate compliance with Condition 20, the permittee must maintain a log of grate cleaning for wood or biomass-fired boilers that includes the date, time and duration of grate cleaning and a log of results of all EPA Method 9 tests performed on the boilers during grate-cleaning operations. The logs must be kept onsite and be made available upon request. [LRAPA 34-016(1)]
- 22. <u>Applicable Requirement:</u> The permittee may only burn biomass, as defined in Condition 22.a, in the wood-fired boilers in Emission Unit EU-01. [LRAPA 32-007(1)(a)]
 - 22.a. "Biomass" means non-fossilized and biodegradable organic material originating from plants, animals, and micro-organisms, including products, byproducts, residues and waste from agriculture, forestry, and related industries as well as the non-fossilized and biodegradable organic fractions of industrial and municipal wastes, including gases and liquids recovered from the decomposition of non-fossilized and biodegradable organic matter. [LRAPA 12-005(23)]
- 23. <u>Applicable Requirement:</u> The permittee must calibrate, maintain, operate, and record the output of a continuous monitoring system (CMS) for measuring the residual oxygen of each wood-fired boiler in Emission Unit EU-01 in accordance with accepted professional standards. [LRAPA 32-008(1)]
 - 23.a. Real time data must be displayed at least once every minute that the boiler is in operation.
 - 23.b. Residual oxygen must be recorded for each hour of operation.
 - 23.c. If residual oxygen from any wood-fired boiler in Emission Unit EU-01 is less than or greater than the operating range established below other than during startup and shut down, grate cleaning and/or soot blowing, the permittee must take corrective action.
 - 23.c.i. Boiler #1: 3.3% to 19.2% (3-hour average);
 - 23.c.ii. Boiler #2: 3.3% to 19.2% (3-hour average); and
 - 23.c.iii. Boiler #3: 3.3% to 19.2% (3-hour average).

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- 23.d. Minimum CMS data availability must be 90% for any day, month, and year. Monitoring data availability must be determined excluding periods of calibrations and routine maintenance. Data recorded during periods of CMS breakdowns, repairs, audits, calibration checks, and zero and span adjustments must not be included in the data averages. [DEQ CMM Appx. C.2(4)]
- 23.e. All excursions of the residual oxygen parameter operating ranges and the corrective action taken to return the boilers to highest and best practicable treatment and control must be recorded in a boiler operating log.
- 23.f. A residual oxygen parameter operating range excursion is not necessarily a violation of the particulate matter emission standard.
- 24. <u>Recordkeeping Requirement:</u> To demonstrate compliance with Conditions 22 and 23 the permittee must maintain a boiler operating log which includes the following: [LRAPA 34-016(1)]
 - 24.a. Records of any change in the type of biomass burned in each boiler, according to Condition 22.
 - 24.b. Hourly and 3-hour average residual oxygen levels according to Condition 23.b and 23.c.
 - 24.c. Excursions of the residual oxygen operating ranges and the corrective actions according to Condition 23.e.
- 25. <u>Applicable Requirement:</u> Within eighteen (18) months of permit issuance, and every 5 years thereafter, the permittee must conduct testing, as specified in Condition 97, to verify the emission factors used to calculate NO_X and CO emissions from Emissions Unit 01 (wood-fired boilers). [LRAPA 35-0120(1)]
- 26. Reporting Requirement: The permittee must comply with the reporting requirements under Condition 95.e. [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]

40 CFR part 63 subpart JJJJJJ—National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources

- 27. <u>Applicable Requirement:</u> General Compliance The permittee must at all times operate and maintain Emission Unit EU-01 (wood-fired boilers) including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11205(a)]
- 28. <u>Applicable Requirement</u>: Biennial Tune-Up The permittee must conduct a performance tune-up of Emission Unit EU-01 (wood-fired boilers) biennially to demonstrate continuous compliance as specified in Conditions 28.a through 28.g. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [LRAPA 44-150(5)(jjjjj)] & 40 CFR 63.11223(a) and 40 CFR 63.11223(b)]
 - 28.a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11223(b)(1)]
 - 28.b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications for the burner, if available. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11223(b)(2)]
 - 28.c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next

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- scheduled unit shutdown, not to exceed 36 months from the previous inspection). [LRAPA 44-150(5)(iiiii) & 40 CFR 63.11223(b)(3)]
- 28.d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [LRAPA 44-150(5)(jijjj) & 40 CFR 63.11223(b)(4)]
- 28.e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR 63.11223(b)(5)]
- 28.f. Maintain on-site and submit, if requested by LRAPA, a report containing the information as follows: [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11223(b)(6)]
 - 28.f.i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [LRAPA 44-150(5)(jijij) & 40 CFR 63.11223(b)(6)(i)]
 - 28.f.ii. A description of any corrective actions taken as a part of the tune-up of the boiler. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11223(b)(6)(ii)]
 - 28.f.iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, 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. [LRAPA 44-150(5)(jijjj) & 40 CFR 63.11223(b)(6)(iii)]
- 28.g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11223(b)(7)]
- 29. Recordkeeping Requirement: The permittee must maintain the records specified in Conditions 29.a through 29.e: [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(c)]
 - 29.a. As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(c)(1)]
 - 29.b. The permittee must keep records to document conformance with the work practices and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as follows: [LRAPA 44-150(5)(jijiji) & 40 CFR 63.11225(c)(2)]
 - 29.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. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(c)(2)(i)
 - 29.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 combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, the permittee must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a). [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(c)(2)(ii)]
 - 29.b.iii. For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(c)(2)(iii)]

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29.c. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(c)(4)]

- 29.d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [LRAPA 44-150(5)(jijjj) & 40 CFR 63.11225(c)(5)]
- 29.e. 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. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(d)]
- 30. Reporting Requirement: For each applicable year, the permittee must prepare and submit to LRAPA upon request, a biennial compliance certification report for the previous calendar year containing the information specified in Conditions 30.a through 30.b. by the date specified in Condition 108. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(b) and 40 CFR 63.10(a)(5)]
 - 30.a. Company name and address. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(b)(1)]
 - 30.b. Statement by a responsible official, with the official's name, title, phone number, e-mail address, and signature, certifying the truth accuracy and completeness of the notification and a statement of whether the source has complied with all of the relevant standards and other requirements of 40 CFR Part 63, Subpart JJJJJJ. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(b)(2)]
 - 30.b.i. "This facility complies with the requirements in § 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler." [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(b)(2)(i)]
 - 30.b.ii. 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." [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(b)(2)(ii)]
 - 30.b.iii. "This facility complies with the requirement in §§ 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." [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11225(b)(2)(iii)]
- 31. 40 CFR Part 63 General Provisions according to Table 8 of 40 CFR 63 Subpart JJJJJJ, incorporated by reference. [LRAPA 44-150(5)(jjjjj) & 40 CFR 63.11235]

Emission Unit EU-02 – Plantsite Fugitives from Material Handling Activities

	Emission Unit EU-02 Emission Limits and Standards					
Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition	
48-015(1)	32	Fugitive Emissions	Minimize	33	34	

32. <u>Applicable Requirement:</u> The permittee must comply with the applicable requirements under Condition 5.

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[LRAPA 48-015(1)]

- 33. <u>Monitoring Requirement:</u> The permittee must comply with the monitoring requirements under Condition 6. [LRAPA 34-016(1), LRAPA 48-015(2)&(3), and OAR 340-218-0050(3)(a)]
- 34. <u>Recordkeeping Requirement:</u> The permittee must comply with the recordkeeping requirements under Condition 7. [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]

Emission Unit EU-03 – Milling Activities

Emission Unit EU-03 Emission Limits and Standards						
Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition	
32-010(2)&(3)	35	Visible Emissions	20% opacity, 6 minute avg.	39	40	
32-015(2)(b)(B)	36	PM	0.14 gr/dscf	41	42	
32-015(2)(c)	37	PM	0.10 gr/dscf	41	42	
32-045(1)	38	PM	Process Weight Rate Limit	41	42	

- 35. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Unit EU-03 (Milling Activities) that equal or exceed an average of 20 percent opacity. When visual determination of opacity is required, the opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(2)&(3)]
- 36. <u>Applicable Requirement:</u> The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 in excess of 0.14 grains per dry standard cubic foot if there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
- 37. <u>Applicable Requirement:</u> The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified on or after April 16, 2015 in excess of 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(c)]
- 38. <u>Applicable Requirement:</u> The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 39. Monitoring Requirement: The permittee must demonstrate compliance with Condition 35 by performing a visible emissions survey of Emission Unit EU-03 (Milling Activities). At least once each quarter the permittee must visually survey the plant using EPA Method 22 or EPA Method 9 for any sources of visible emissions. If EPA Method 22 is used, the minimum observation period is 30 minutes. If EPA Method 9 is used, opacity must be measured as a six-minute block average. For the purposes of this Condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-016(1)]
 - 39.a. If visible emissions are observed using EPA Method 22 or EPA Method 9, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 or EPA Method 9 within 24 hours of the previous visible emissions survey.
 - 39.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey

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detects visible emissions from the same source(s), the permittee is required to immediately contact LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance with Condition 35, no further action is required beyond the recordkeeping required in Condition 40. If the results of EPA Method 9 are not in compliance with Condition 35, the permittee must immediately contact LRAPA.

- 40. Recordkeeping Requirement: The permittee must keep documentation of all visible emissions surveys required by Condition 39. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]
- 41. <u>Monitoring Requirement:</u> To demonstrate compliance with Conditions 36 38, the permittee must exhaust the particulate matter emissions from Emissions Unit EU-03 (Milling Activities) to a cyclone, target box, and/or baghouse whenever the associated milling equipment in this process is operating. The permittee must operate, maintain, and monitor each cyclone, target box, and baghouse associated with Emission Unit EU-03 to ensure emission reduction is at the highest reasonable efficiency and effectiveness. [LRAPA 32-005(1), 32-007(1)(b), 34-016(1), and OAR 340-218-0050(3)(a)]
 - 41.a. The permittee must operate, maintain and calibrate monitoring devices for measuring the pressure drop across each baghouse used to control emissions from Emission Unit EU-03 (Milling Activities). The permittee must maintain the pressure drop across each baghouse between 0.1 and 5 inches of water column whenever the associated milling equipment in Emission Unit EU-03 is operating. The permittee may establish alternate operating parameter ranges or values with the approval of LRAPA using the procedures under OAR-340-218.
 - 41.a.i. The following corrective actions are required for all deviations that are observed during regular inspections that show air pollution control equipment to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parametric monitoring range:
 - 41.a.i.A. The permittee must immediately take corrective action to return to the highest reasonable efficiency and effectiveness all air pollution control equipment and emission reduction processes that regular inspections show to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parametric monitoring range.
 - 41.a.i.B. Operating the baghouse when the pressure drop exceeds the parametric monitoring range listed in Condition 22 is not considered a violation of an emission limit. However, failure to take corrective action will be considered a violation of this permit.
- 42. <u>Recordkeeping Requirement:</u> The permittee must maintain a monitoring log for all pollution control equipment associated with Emission Unit EU-03 (Milling Activities) which must include the following: [LRAPA 34-016(1)]
 - 42.a. At least once a week while the associated milling equipment in Emission Unit EU-03 is operating, the permittee must measure and record the pressure drop, in inches of water column, across each baghouse.
 - 42.b. Records of any maintenance or corrective action necessary to return pollution control equipment to highest reasonable efficiency and effectiveness or return to operation within the approved parametric monitoring range.

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Emission Unit EU-05 - VOCs (not listed elsewhere) Paints, inks, sealers, adhesives, etc.

Emission Unit EU-05 Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition
32-007(1)(a)	43	VOC, HAP	Work Practices – Resin Adhesive System	44	44
32-007(1)(a)	45	VOC, HAP	Work Practices – VOC and HAP-containing materials	46	46

43. <u>Applicable Requirement</u>: The permittee must only use resin adhesive systems in the production of glue laminated lumber for which methanol and total VOC emissions have been quantified and do not exceed the values listed in the table below for the corresponding application. [LRAPA 32-007(1)(a)]

Application	Methanol (g/g mixed adhesive)	Total VOC (g/g mixed adhesive)	
Lam Finger Joint Adhesive	0.01890	0.01912	
Lam Press Face Adhesive	0.00014	0.00106	

- 44. <u>Monitoring and Recordkeeping Requirement:</u> To demonstrate compliance with Condition 43, the permittee must maintain current documentation for each resin adhesive system used at the facility which demonstrates the methanol and total VOC emissions resulting from use of the material. [LRAPA 34-016(1)]
- 45. <u>Applicable Requirement:</u> The permittee must not allow VOC and HAP-containing materials to be handled in a manner that would result in excess vapor release to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [LRAPA 32-007(1)(a)]
 - 45.a. Ensure that VOC and HAP-containing materials are stored according to manufacturer recommendations and containers are kept closed to the extent possible;
 - 45.b. Minimize spills;
 - 45.c. Clean up spills as expeditiously as practicable.
- 46. <u>Monitoring and Recordkeeping Requirement:</u> To demonstrate compliance with Condition 45, the permittee must maintain documentation of the standard operating procedures related to the storage and handling of VOC and HAP-containing materials which includes, but is not limited to, the following: [LRAPA 34-016(1)]
 - 46.a. Procedures related to ensuring that VOC and HAP-containing materials are stored according to manufacturer recommendations and containers are kept closed to the extent possible;
 - 46.b. Procedures for minimizing spills;
 - 46.c. Procedures for cleaning spills, including locations of spill control materials.
 - 46.d. A copy of the permittee's current Stormwater Pollution Control Plan may be used to satisfy Condition 46 if it contains the required elements listed in Conditions 46.a 46.c.

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Emission Unit EU-08 - Dry Kilns A - I

Emission Unit EU-08 Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition
32-010(2)&(3)	47	Visible Emissions	20% opacity, 6-minute avg.	51	52
32-015(2)(b)(B)	48	PM	0.14 gr/dscf	51	52
32-015(2)(c)	49	PM	0.10 gr/dscf	51	52
32-045(1)	50	PM	Process Weight Rate Limit	51	52
32-007, 42-0080	53	VOC, HAP	195 °F (dry bulb)	54	54

- 47. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Unit EU-08 (Dry Kilns) that equal or exceed an average of 20 percent opacity. When visual determination of opacity is required, the opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(2)&(3)]
- 48. <u>Applicable Requirement:</u> The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 in excess of 0.14 grains per dry standard cubic foot if there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
- 49. <u>Applicable Requirement</u>: 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 in excess of 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(c)]
- 50. <u>Applicable Requirement:</u> The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- Monitoring Requirement: The permittee must demonstrate compliance with Conditions 47 through 50 by performing a visible emissions survey of Emission Unit EU-08 (Dry Kilns). At least once each quarter the permittee must visually survey Emission Unit EU-08 (Dry Kilns) using EPA Method 22 or EPA Method 9 for any sources of visible emissions. If EPA Method 22 is used, the minimum observation period is 30 minutes. If EPA Method 9 is used, opacity must be measured as a six-minute block average. For the purposes of this Condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-016(1)]
 - 51.a. If visible emissions are observed using EPA Method 22 or EPA Method 9, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 or EPA Method 9 within 24 hours of the previous visible emissions survey.
 - 51.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey detects visible emissions from the same source(s), the permittee is required to immediately contact LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance with Condition 47, no further action is required beyond the recordkeeping required in Condition 52. If the results of EPA Method 9 are not in compliance with Condition 47, the permittee must immediately contact LRAPA.

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52. Recordkeeping Requirement: The permittee must keep documentation of all visible emissions surveys required by Condition 51. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]

- Applicable Requirement: The permittee must operate each dry kiln in Emission Unit EU-08 such that the maximum operating temperature does not exceed 195°F (dry bulb) for a continuous period of more than 30 minutes whenever a dry kiln is operating and loaded with a charge. If the maximum operating temperature exceeds 195°F (dry bulb) for a continuous period of 30 minutes or more, the permittee must initiate corrective action to decrease the operating temperature below 195 °F (dry bulb). Exceeding an operating temperature of 195°F (dry bulb) for a continuous period of 30 minutes or more is not a violation of this permit if the permittee initiates corrective action. [LRAPA 32-007 and 42-0080]
- 54. <u>Monitoring and Recordkeeping Requirement:</u> The permittee must maintain a continuous temperature monitoring system for each dry kiln in Emission Unit EU-08. If the maximum operating temperature exceeds 195°F (dry bulb) for a continuous period of 30 minutes or more, the permittee must record the date, time, and duration of each exceedance, and the corrective action taken to decrease the operating temperature below 195°F (dry bulb). [LRAPA 34-016(1)]

GENERAL INSIGNIFICANT ACTIVITY REQUIREMENTS

- 55. <u>Applicable Requirement</u>: LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant activities as defined in title 12 exist at facilities required to obtain a Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
 - 55.a. Subsections 32-010(2)&(3) 20% opacity as a six-minute block average for sources other than wood fired boilers.
 - 55.b. Subparagraph 32-015(2)(b)(B) 0.14 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 if there are no representative compliance source tests.
 - 55.c. Paragraph 32-015(2)(c) 0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified on or after April 16, 2015.
 - 55.d. Paragraphs 32-030(1)(b)&(3)(b) 0.14 gr/dscf for fuel burning equipment sources installed, constructed, or modified on or after June 1, 1970, but prior to April 16, 2015 if there are no representative compliance source tests. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
 - 55.e. Paragraphs 32-030(1)(a)&(3)(b) 0.10 gr/dscf for fuel burning equipment sources installed, constructed, or modified on or after April 16, 2015. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
 - 55.f. Section 32-045 process weight limit for non-fugitive, non-fuel burning process equipment.
- 56. Testing, Monitoring, and Recordkeeping Requirements: Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of "opacity" and "particulate matter" in title 12 and perform the testing in accordance with DEQ's Source Sampling Manual. [LRAPA 35-0120]

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SPECIFIC INSIGNIFICANT ACTIVITY REQUIREMENTS

Aggregate Insignificant Activity – Gasoline Dispensing Facility (GDF)

Emission Unit AIA-1 – Gasoline Dispensing Facility Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring & Testing Condition	Recordkeeping & Reporting Condition
OAR 340-244- 0231 through 340- 244-0252	57, 70	VOC	Work Practices, Submerged Fill	71, 72	72
40 CFR part 63 subpart CCCCCC	82, 84	HAP, VOC	Operation and Maintenance, Work Practices	88	88, 89

[Conditions 57 through 73 enforceable only by LRAPA.]

- 57. <u>Applicable Requirement</u>: The emission sources to which OAR 340-244-0231 through OAR 340-244-0252 apply are gasoline storage tanks and all associated equipment components in vapor or liquid gasoline service at a GDF. [OAR 340-244-0234(1)]
- 58. <u>Applicable Requirement:</u> The affected source to which the emission standards apply is each GDF. The affected source includes each gasoline cargo tank during the delivery of gasoline to a GDF, each gasoline storage tank, pressure/vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at a GDF. [OAR 340-244-0234(2)]
- 59. <u>Applicable Requirement:</u> Each GDF will fall into one or more of the categories listed in this Condition. Where multiple categories apply to one GDF, the requirements of each applicable category apply to that GDF. Each GDF category is followed by a number which is used to indicate which rules in division 244 apply to that GDF: [OAR 340-244-0234(4)]
 - 59.a. A GDF located anywhere in the state that has only gasoline storage tanks with capacity of less than 250 gallons, hereafter referred to as GDF 1. [OAR 340-244-0234(4)(a)]
 - 59.b. A GDF located anywhere in the state with a gasoline storage tank that has a capacity of 250 gallons or more, hereafter referred to as GDF 2. [OAR 340-244-0234(4)(b)]
 - 59.c. A GDF located anywhere in the state with 120,000 gallons or more of annual gasoline throughput, hereafter referred to as GDF 3. [OAR 340-244-0234(4)(c)]
 - 59.d. A GDF located anywhere in the state with 600,000 gallons or more of annual gasoline throughput, hereafter referred to as GDF 4. [OAR 340-244-0234(4)(d)]
 - 59.e. A GDF located anywhere in the state with 1,000,000 gallons or more of annual gasoline throughput, hereafter referred to as GDF 5. [OAR 340-244-0234(4)(e)]
- 60. <u>Applicable Requirement:</u> The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to Condition 67.b. [OAR 340-244-0234(7)]
- 61. <u>Applicable Requirement:</u> If the affected source ever exceeds an applicable threshold, throughput or otherwise, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source later falls below the applicable threshold. [OAR 340-244-0234(8)]
- 62. <u>Applicable Requirement</u>: For a source that becomes subject to a requirement to install a Stage I vapor balance system, Enhanced Vapor Recovery system, or complete any other equipment change because of an increase in throughput, the permittee must have completed the equipment changes no later than 24 months after the affected source becomes subject to the additional or changed requirement, unless otherwise

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- specified within OAR 340-244. [OAR 340-244-0234(9)]
- 63. <u>Applicable Requirement</u>: A split compartment gasoline storage tank (i.e., one storage tank that is internally divided to hold two or more different types of liquid) will have each compartment of the tank treated as a separate storage tank for purposes of compliance with OAR 340-244-0231 through OAR 340-244-0252. [OAR 340-244-0234(10)]
- 64. <u>Applicable Requirement</u>: All equipment installed at a GDF that is in gasoline liquid or vapor service must be compatible with gasoline according to the equipment manufacturer's instructions or documentation. [OAR 340-244-0234(12)]
- 65. <u>Applicable Requirement</u>: A permittee that owns or operates a GDF must, at all times, operate and maintain all equipment, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [OAR 340-244-0235(1)]
- 66. <u>Applicable Requirement</u>: Compliance with OAR 340-244-0231 through OAR 340-244-0252 does not exempt the permittee from enforcement for any noncompliance with applicable requirements during a malfunction event. [OAR 340-244-0235(2)]
- 67. <u>Applicable Requirement:</u> A permittee that owns or operates a GDF 2 as described in OAR 340-244-0234(4) must comply with the following requirements [OAR 340-244-0238]
 - 67.a. All applicable requirements under OAR 340-244-0237; and [OAR 340-244-0238(1)]
 - 67.b. Reporting under OAR 340-244-0251. [OAR 340-244-0238(2)]
- 68. <u>Applicable Requirement</u>: Work Practices. A permittee that owns or operates a GDF must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [OAR 340-244-0245(1)]
 - 68.a. Minimize gasoline spills; [OAR 340-244-0245(1)(a)]
 - 68.b. Do not top off or overfill vehicle tanks. [OAR 340-244-0245(1)(b)]
 - 68.c. If a person can confirm that a vehicle tank is not full after the nozzle clicks off, such as by checking the vehicle's fuel tank gauge, the person may continue to dispense fuel using best judgment and caution to prevent a spill; [OAR 340-244-0245(1)(b)(A)]
 - 68.d. Post sign(s) at the GDF instructing a person filling up a motor vehicle to not top off the vehicle tank. A sign must be placed on each gasoline dispenser, or on a permanent fixture within six (6) feet of the dispenser, and be clearly visible to an individual using the hose and nozzle to dispense gasoline; [OAR 340-244-0245(1)(b)(B)]
 - 68.e. Clean up spills as expeditiously as practicable. The permittee must develop a written plan that describes how a spill will be cleaned up upon occurrence. The plan must include, but is not limited to, where spill materials are located, a brief description of how each is used, and an explanation of how the permittee is implementing the 'as expeditiously as practicable' requirement of this Condition. [OAR 340-244-0245(1)(c)]
 - 68.f. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [OAR 340-244-0245(1)(d)]
 - 68.g. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [OAR 340-244-0245(1)(e)]
 - 68.h. Ensure that cargo tanks unloading gasoline at the GDF comply with Conditions 68 through 68.e [OAR 340-244-0245(1)(f)]
- 69. Applicable Requirement: Submerged Fill. Except for gasoline storage tanks with a capacity of less than 250

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gallons, a permittee that owns or operates a GDF must only load gasoline into storage tanks at the GDF by utilizing submerged filling, as defined in OAR 340-244-0232, and as specified in Conditions 69, 69.a or 69.b. The applicable distances in Conditions 69 and 69.a must be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank. [OAR 340-244-0245(2)]

- 69.a. Submerged fill pipes installed on or before Nov. 9, 2006, must be no more than 12 inches from the bottom of the storage tank. [OAR 340-244-0245(2)(a)]
- 69.b. Submerged fill pipes installed after Nov. 9, 2006, must be no more than six (6) inches from the bottom of the storage tank. [OAR 340-244-0245(2)(b)]
- 69.c. Submerged fill pipes not meeting the specifications of Conditions 69. and 69.a. are allowed if a permittee that owns or operates a GDF can demonstrate that the liquid level in the tank is and always has been above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by LRAPA during the course of a site visit or upon request within 48 hours. [OAR 340-244-0245(2)(c)]
- 70. <u>Applicable Requirement</u>: Portable gasoline containers that meet the requirements of 40 CFR part 59 subpart F are considered acceptable for compliance with Condition 68.e. [OAR 340-244-0245(4)]
- 71. <u>Monitoring and Recordkeeping Requirement</u>: A permittee that owns or operates a GDF must have records available within 24 hours of a request by LRAPA to document gasoline throughput. [OAR 340-244-0250(1)]
- 72. <u>Monitoring and Recordkeeping Requirement</u>: A permittee that owns or operates a GDF must keep the following records: [OAR 340-244-0250(2)]
 - 72.a. Records related to the operation and maintenance of all equipment in gasoline service, including Stage I vapor balance, Enhanced Vapor Recovery, and Stage II vapor recovery equipment. Any equipment in gasoline or vapor service with a defect, leak, or malfunction must be logged and tracked by the permittee using forms provided by LRAPA or a reasonable facsimile; [OAR 340-244-0250(2)(b)]
 - 72.b. Records of total throughput volume of gasoline, in gallons, for each calendar month; [OAR 340-244-0250(2)(c)]
 - 72.c. Records of permanent changes made at the GDF and equipment in gasoline service which may affect emissions. This includes, but is not limited to, installing new gasoline storage tanks, installing new vapor control equipment, changing vapor control equipment, or removing gasoline storage tanks or vapor control equipment; [OAR 340-244-0250(2)(d)]
 - 72.d. Records of the occurrence and duration of each malfunction of operation, including, without limitation, malfunctions of process equipment or the air pollution control and monitoring equipment; [OAR 340-244-0250(2)(e)]
 - 72.e. Records of actions taken during periods of malfunction to minimize emissions in accordance with Conditions 64 and 65, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation; [OAR 340-244-0250(2)(f)]
 - 72.f. If subject to Condition 68.h, submerged fill requirements, the permittee must keep documentation from the equipment manufacturer, a service provider, or other similar documentation which demonstrates that each submerged fill tube is a compliant length. These records must be retained for as long as the permittee is subject to any submerged fill requirements under Condition 68.h; and [OAR 340-244-0250(2)(g)]
 - 72.g. A copy of the written plan for cleanup of spills required by Condition 68.d. The plan must be retained for as long as the facility meets the definition of a GDF. [OAR 340-244-0250(2)(h)]
- 73. Recordkeeping Requirement: Records required under Condition 71 must be kept for a period of 5 years, unless otherwise specified, and must be made available for inspection and review by LRAPA during the course of a site visit. [OAR 340-244-0250(3)]

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40 CFR part 63 subpart CCCCCC – National Emission Standards of Hazardous Air Pollutants for Source Category: Gasoline Dispensing Facilities

- 74. <u>Applicable Requirement:</u> The affected source to which 40 CFR part 63 subpart CCCCCC applies is each GDF that is located at an area source. The affected source includes each gasoline cargo tank during the delivery of product to a GDF and also includes each storage tank. [40 CFR 63.11111(a)]
- 75. <u>Applicable Requirement:</u> Permittees that operate a GDF which has a monthly throughput of less than 10,000 gallons of gasoline must comply with the requirements in Conditions 84 through 87. [40 CFR 63.1111(b)]
 - 75.a. Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDF at separate locations within the area source, each GDF is treated as a separate affected source. [40 CFR 63.11111(h)]
- 76. Applicable Requirement: The permittee shall, upon request by LRAPA, demonstrate that their monthly throughput is less than the 10,000-gallon threshold level. For new or reconstructed affected sources, as specified in 40 CFR 63.11112(b) and (c), recordkeeping to document monthly throughput must begin upon startup of the affected source. For existing sources, as specified in 40 CFR 63.11112(d), recordkeeping to document monthly throughput must begin on January 10, 2008. For existing sources that are subject to this subpart only because they load gasoline into fuel tanks other than those in motor vehicles, as defined in 40 CFR 63.11132, recordkeeping to document monthly throughput must begin on January 24, 2011. Records required under this paragraph shall be kept for a period of 5 years. [40 CFR 63.11111(e)]
- 77. <u>Applicable Requirement:</u> If the permittee is an owner or operator of an affected source, as defined in Condition 74, the permittee is not required to obtain a permit under 40 CFR part 70 or 40 CFR part 71 as a result of being subject to this subpart. However, the permittee must still apply for and obtain a permit under 40 CFR part 70 or 40 CFR part 71 if the permittee meets one or more of the applicability criteria found in 40 CFR 70.3(a) and (b) or 40 CFR 71.3(a) and (b). [40 CFR 63.11111(f)]
- 78. <u>Applicable Requirement:</u> If the permittee's affected source's throughput ever exceeds an applicable throughput threshold, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. [40 CFR 63.1111(i)]
- 79. <u>Applicable Requirement:</u> The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to 40 CFR 63.11116 of this subpart. [40 CFR 63.11111(j)]
- 80. Applicable Requirement: For any affected source subject to the provisions of 40 CFR part 63 subpart CCCCCC and another Federal rule, the permittee may elect to comply only with the more stringent provisions of the applicable subparts. The permittee must consider all provisions of the rules, including monitoring, recordkeeping, and reporting. The permittee must identify the affected source and provisions with which they will comply in their Notification of Compliance Status required under 40 CFR 63.11124. The permittee also must demonstrate in their Notification of Compliance Status that each provision with which they will comply is at least as stringent as the otherwise applicable requirements in this subpart. The permittee is responsible for making accurate determinations concerning the more stringent provisions, and noncompliance with this rule is not excused if it is later determined that their determination was in error, and, as a result, they are violating this subpart. Compliance with this rule is the permittee's responsibility and the Notification of Compliance Status does not alter or affect that responsibility. [40 CFR 63.11111(k)]
- 81. <u>Applicable Requirement</u>: The emission sources to which this subpart applies are gasoline storage tanks and associated equipment components in vapor or liquid gasoline service at new, reconstructed, or existing GDF that meet the criteria specified in 40 CFR 63.11111. Pressure/Vacuum vents on gasoline storage tanks

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and the equipment necessary to unload product from cargo tanks into the storage tanks at GDF are covered emission sources. The equipment used for the refueling of motor vehicles is not covered by this subpart. [40 CFR 63.1112(a)]

- 82. <u>Applicable Requirement</u>: The permittee must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11115(a)]
- 83. <u>Applicable Requirement</u>: The permittee must keep applicable records and submit reports as specified in Conditions 88 and 89.[40 CFR 63.11115(b)]
- 84. <u>Applicable Requirement</u>: The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [40 CFR 63.11116(a)]
 - 84.a. Minimize gasoline spills; [40 CFR 63.11116(a)(1)]
 - 84.b. Clean up spills as expeditiously as practicable; [40 CFR 63.11116(a)(2)]
 - 84.c. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [40 CFR 63.11116(a)(3)]
 - 84.d. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [40 CFR 63.11116(a)(4)]
- 85. <u>Applicable Requirement</u>: The permittee is not required to submit notifications or reports as specified in 40 CRR 63.11125, 40 CFR 63.11126, or 40 CFR part 63 subpart A, but the permittee must have records available within 24 hours of a request by LRAPA to document gasoline throughput. [40 CFR 63.11116(b)]
- 86. <u>Applicable Requirement</u>: The permittee must comply with the requirements of this subpart by the applicable dates specified in 40 CFR 63.11113. [40 CFR 63.11116(c)]
- 87. <u>Applicable Requirement</u>: Portable gasoline containers that meet the requirements of 40 CFR part 59, subpart F, are considered acceptable for compliance with Condition 84.c. [40 CFR 63.11116(d)]
- 88. Recordkeeping Requirement: The permittee of an affected source under this subpart shall keep records as specified in Conditions 88.a and 88.b.[40 CFR 63.11125(d)]
 - 88.a. Records of the occurrence and duration of each malfunction of operation (i.e., process equipment) or the air pollution control and monitoring equipment. [40 CFR 63.11125(d)(1)]
 - 88.b. Records of actions taken during periods of malfunction to minimize emissions in accordance with Condition 82, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation. [40 CFR 63.11125(d)(2)]
- 89. Reporting Requirement: The permittee of an affected source under this subpart shall report, by the date specified in Condition 108, the number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded. The report must also include a description of actions taken by an owner or operator during a malfunction of an affected source to minimize emissions in accordance with § 63.11115(a), including actions taken to correct a malfunction. No report is necessary for a calendar year in which no malfunctions occurred. [40 CFR 63.11126(b)]

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PLANT SITE EMISSION LIMITS

90. <u>Applicable Requirement</u>: The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040 and 42-0041]

Plant Site Emission Limits

Pollutant	Plant Site Emission Limit (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credit (TPY)
PM	120	17	0
PM_{10}	113	15	0
$PM_{2.5}$	94	10	0
CO	274	0	0
NO_X	181	0	0
SO_2	5.0	1	0
VOC	210	0	0
GHG as CO ₂ e	144,110	0	0
Single HAP	9	NA	0
Aggregate HAP	24	NA	0

Plant Site Emission Limit Monitoring

91. To demonstrate compliance with the PSELs in Condition 90, the permittee must monitor and maintain records of the following process parameters: [LRAPA 34-016, 42-0080 and OAR 340-218-0050(3)(a)]

Process Parameter Monitoring

EU ID	Emission Unit	Pollutant	Process Parameter	Measurement Technique	Measurement Frequency
EU-01	Wood-fired boilers	PM, PM ₁₀ , PM _{2.5} , CO, NO _X , SO ₂ , VOC, GHG, HAP	Steam produced (lbs)	Recordkeeping	Monthly
EU-02	Plantsite Fugitives from Material Handling Activities - Chips	PM, PM ₁₀ , PM _{2.5}	Material Handled - Chips (Green Tons)	Recordkeeping	Monthly
EU-02	Plantsite Fugitives from Material Handling Activities – Hog Fuel, Sawdust, Shavings	PM, PM ₁₀ , PM _{2.5}	Material Handled – Hog Fuel, Sawdust, Shavings (Green Tons)	Recordkeeping	Monthly
EU-03	Milling Activities	PM, PM ₁₀ , PM _{2.5}	Cyclone, Target Box, and Baghouse Throughput (BDT)*	Recordkeeping	Monthly
EU-05	VOC (not listed elsewhere)	VOC, HAPs	Usage of VOC and/or HAP containing materials (gallons or lbs)	Recordkeeping	Monthly
EU-05	VOC (not listed elsewhere)	VOC, HAPs	Usage of Lam Press Face Adhesive (lbs)	Recordkeeping	Monthly
EU-05	VOC (not listed elsewhere)	VOC, HAPs	Usage of Lam Press Finger Joint Adhesive (lbs)	Recordkeeping	Monthly
EU-08	Dry Kilns	PM, PM ₁₀ , PM _{2.5} , VOC, HAPs	Amount of Douglas Fir Processed at 170, 175, 180,	Recordkeeping	Monthly

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Process Parameter Monitoring

EU ID	Emission Unit	Pollutant	Process Parameter	Measurement Technique	Measurement Frequency
			185, and 190°F (MBF)		
EU-08	Dry Kilns	PM, PM ₁₀ , PM _{2.5} , VOC, HAPs	Amount of Hemlock Processed at 170, 175, 180, 185, and 190°F (MBF)	Recordkeeping	Monthly
AIA-1	Aggregate Insignificant Activities – Gasoline Dispensing Facility (GDF)	VOC	Gasoline throughput (gallons)	Recordkeeping	Monthly, Annually

^{*}The permittee may calculate BDT from other production parameters.

92. By the 15th working day of each month, the permittee must determine compliance with the previous consecutive 12 calendar month PSELs. Compliance with the PSELs are determined for each consecutive 12 calendar month period based on the following calculation for each regulated pollutant: [LRAPA 34-016, 35-0270 and 42-0080(4)(c)]

$$E = AIA + EE + \sum_{i=1}^{12} \frac{EF \cdot P_n}{2000}$$

Where:

E = Emissions in tons per year for a given regulated pollutant;

AIA = 1 ton for any consecutive 12 calendar month period for any aggregate insignificant activities, by pollutant;

EE = Any excess emissions, by pollutant, in tons per year;

 Σ = Symbol representing "summation of";

EF = Pollutant emission factor in Condition 93;

P = Process production or time of operation, in units compatible with the emission factor;

n = A given process that emits the same regulated pollutant; and

i = Month, beginning with the most recent, summing for 12 preceding, consecutive calendar months.

93. The permittee must use the following emission rates or emission factors for calculating pollutant emissions, unless alternative emission rates or emission factors are approved by LRAPA. The permittee may request the use of alternative emission rates or emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors). The use of alternative emission rates or emission factors is not allowed until the alternative emission rates or emission factors have been reviewed and approved by LRAPA using procedures in title 34 and/or title 37, as appropriate. [LRAPA 34-016(1) and 42-0080(4)(c)]

Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
		PM	0.316	lb/Mlb Steam	Source Test Data	96
EU-01	EU-01 Wood-fired boilers	PM_{10}	0.300	lb/Mlb Steam	Source Test Data, DEQ AQ-EF03	NA
		PM _{2.5}	0.253	lb/Mlb	Source Test	NA

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Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
				Steam	Data, DEQ AQ-EF03	
		NOx	0.528	lb/Mlb Steam	Source Test Data	97
		SO_2	0.014	lb/Mlb Steam	DEQ AQGP- 010	NA
		СО	0.800	lb/Mlb Steam	Source Test Data & NCASI Technical Bulletin No. 1013	97
		VOC	0.130	lb/Mlb Steam	DEQ AQGP- 010	97
		GHG (CO2e)	420.8	lb/Mlb Steam	DEG GHG Steam Calculator	NA
		Aggregate HAP	0.043	lb/Mlb Steam	AP-42, DEQ AQGP-010, NCASI, & Source Test Data	NA
		Single HAP (MeOH)	0.002	lb/Mlb Steam	Source Test Data	NA
	Fugitive Emissions from	PM/ PM ₁₀	1.60 x 10 ⁻⁴	lb/Green Ton	NCASI Special Report NO. 15-01	NA
EH 02	Material Handling - Chips	PM _{2.5}	2.80 x 10 ⁻⁵	lb/Green Ton	NCASI Special Report NO. 15-01	NA
EU-02	Fugitive Emissions from Material	PM/ PM ₁₀	2.70 x 10 ⁻³	lb/Green Ton	NCASI Special Report NO. 15-01	NA
	Handling – Hog Fuel/Sawdust/ Shavings	PM _{2.5}	4.50 x 10 ⁻⁴	lb/Green Ton	NCASI Special Report NO. 15-01	NA
		PM	0.500	lb/BDT	DEQ AQ- EF02	NA
	Milling Activities:	PM_{10}	0.425	lb/BDT	DEQ AQ- EF03	NA
	Cyclones	PM _{2.5}	0.250	lb/BDT	DEQ AQ- EF03	NA
EU-03	NA:II:	PM	0.100	lb/BDT	DEQ AQ- EF02	NA
	Milling Activities:	PM_{10}	0.085	lb/BDT	DEQ AQ- EF03	NA
	Target Box	PM _{2.5}	0.050	lb/BDT	DEQ AQ- EF03	NA
	Milling	$PM/PM_{10}/PM_{2.5}$	0.040	lb/BDT	DEQ AQ-	NA

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	1	Emission Factors Use	Turbi Calculat	ing Emissions	•	I
Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
	Activities:				EF02	
	Baghouse #18 Milling Activities: Baghouse #5, #26	PM/PM ₁₀ /PM _{2.5}	0.001	lb/BDT	DEQ AQ- EF02	NA
	VOC (not listed	VOC	1.06 x10 ⁻³	lb/lb adhesive	2011 Caul Plate Test	NA
	elsewhere) Lam Press Face	Aggregate HAP	1.67 x10 ⁻⁴	lb/lb adhesive	2011 Caul Plate Test	NA
	Adhesive	Single HAP (MeOH)	1.42 x10 ⁻⁴	lb/lb adhesive	2011 Caul Plate Test	NA
EU-05	VOC (not listed	VOC	0.019	lb/lb adhesive	2023 Caul Plate Test	NA
	elsewhere) Lam Press Finger	Aggregate HAP	0.019	lb/lb adhesive	2023 Caul Plate Test	NA
	Joint Adhesive	Single HAP (MeOH)	0.019	lb/lb adhesive	2023 Caul Plate Test	NA
	VOC (not listed elsewhere) Material balance activities	VOC, Aggregate HAP, Single HAP	100%	lb/lb material	Current SDS	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns –	VOC	0.666	lb/ MBF	DEQ AQ- EF09	NA
	Douglas Fir, 170°F	Aggregate HAP	0.0837	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0376	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns – Douglas Fir,	VOC	0.741	lb/ MBF	DEQ AQ- EF09	NA
EU-08	175°F	Aggregate HAP	0.0902	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0439	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns – Douglas Fir,	VOC	0.816	lb/ MBF	DEQ AQ- EF09	NA
	180°F	Aggregate HAP	0.0966	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0502	lb/ MBF	DEQ AQ- EF09	NA
	Dry Kilns – Douglas Fir,	PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	185°F	VOC	0.891	lb/ MBF	DEQ AQ-	NA

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Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
					EF09	
		Aggregate HAP	0.1031	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0565	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns –	VOC	0.966	lb/ MBF	DEQ AQ- EF09	NA
	Douglas Fir, 190°F	Aggregate HAP	0.1096	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0628	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns –	VOC	0.240	lb/ MBF	DEQ AQ- EF09	NA
	Hemlock, 170°F	Aggregate HAP	0.1440	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0280	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns –	VOC	0.266	lb/ MBF	DEQ AQ- EF09	NA
	Hemlock, 175°F	Aggregate HAP	0.1573	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0410	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns –	VOC	0.292	lb/ MBF	DEQ AQ- EF09	NA
	Hemlock, 180°F	Aggregate HAP	0.1716	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0550	lb/ MBF	DEQ AQ- EF09	NA
		PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Dry Kilns –	VOC	0.318	lb/ MBF	DEQ AQ- EF09	NA
	Hemlock, 185°F	Aggregate HAP	0.1859	lb/ MBF	DEQ AQ- EF09	NA
		Single HAP (MeOH)	0.0690	lb/ MBF	DEQ AQ- EF09	NA
	Dry Kilns – Hemlock, 190°F	PM/PM ₁₀ /PM _{2.5}	0.020	lb/ MBF	DEQ AQGP- 010	NA
	Heimock, 190 F	VOC	0.344	lb/ MBF	DEQ AQ-	NA

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Emission Factors Used For Calculating Emissions

Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
					EF09	
Aggregate HAP		0.1993	lb/ MBF	DEQ AQ- EF09	NA	
		Single HAP (MeOH)	0.0820	lb/ MBF	DEQ AQ- EF09	NA

94. The permittee must register and report in compliance with Chapter 340, Division 215 of the Oregon Administrative Rules, if the source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO2e during the previous year. Once a source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO2e during a year, the permittee must annually register and report in each subsequent year, regardless of the amount of the source's direct GHG emissions in future years, except as provided in OAR 340-215-0032 and OAR 340-215-0034. Air contamination sources required to register and report under OAR 340-215-0030(2) must register and submit annual emissions data reports to LRAPA under OAR 340-215-0044 by the due date for the annual report for non-greenhouse gas emissions specified in Condition 108, or by March 31 of each year, whichever is later. [LRAPA 34-016, OAR 340-215-0030(2) and 340-340-215-0046(1)(a)]

GENERAL TESTING REQUIREMENTS

- 95. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual. [LRAPA 35-0120, 35-0140, and OAR 340-218-0050(3)(a)(B)&(C)]
 - 95.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
 - 95.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
 - 95.c. Unless otherwise specified by permit condition or LRAPA-approved source test plan, all compliance source tests must be performed as follows
 - 95.c.i. At least 90% of the design capacity for new or modified equipment;
 - 95.c.ii. At least 90% of the normal maximum operating rate for existing equipment.
 - 95.c.iii. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
 - 95.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
 - 95.e. Source test reports prepared in accordance with the ODEQ's Source Sampling Manual must be submitted to LRAPA within 60 days of completing any required source test, unless a different

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time period is approved in the source test plan submitted prior to the source test.

Unit-Specific Testing Requirements

- 96. Within eighteen (18) months of permit issuance, and every 5 years thereafter, the permittee must conduct testing in accordance with Condition 95 to verify the emission factors used to calculate total particulate emissions from Emissions Unit E01 (wood-fired boilers) and compliance with the emission limit specified in Condition 14. During the compliance test, the permittee must also conduct visible emissions testing for each exhaust stack. [LRAPA 35-0120(1)]
 - 96.a. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA:
 - 96.a.i. Total particulate matter using DEQ Method 5 or EPA Methods 5 and 202.
 - 96.a.ii. Visible emissions using EPA Method 9.
 - 96.b. During each test run, the permittee must record the following information:
 - 96.b.i. As-fired fuel characteristics including moisture content, approximate percentage of bark, species, and percent by weight less than 1/8 inch;
 - 96.b.ii. Steaming rate of each boiler operating during the test (lbs/hr);
 - 96.b.iii. Boiler excess oxygen (%);
 - 96.b.iv. Pressure drop across each multiclone during testing (inches of water column).
- 97. Within eighteen (18) months of permit issuance, and every 5 years thereafter, the permittee must conduct testing in accordance with Condition 95 to verify the emission factors used to calculate NO_X and CO emissions from Emissions Unit EU-01. In addition, the permittee must sample and perform fuel analyses of the biomass combusted during the emission factor verification testing on the boilers in order to verify the hogged-fuel F-Factor. [LRAPA 35-0120(1)]
 - 97.a. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 35-0120(1)(a)]
 - 97.a.i. Nitrogen oxides by EPA Method 7E.
 - 97.a.ii. Carbon monoxide by EPA Method 10.
 - 97.a.iii. Hogged-fuel F-Factor by EPA Method 19.
 - 97.b. Emissions results must be reported in pounds per 1000 pounds of steam produced.
 - 97.c. During each test run, the permittee must record the following information:
 - 97.c.i. As-fired fuel characteristics including moisture content, approximate percentage of bark, species, and percent by weight less than 1/8 inch;
 - 97.c.ii. Steaming rate of each boiler operating during the test (lbs/hr);
 - 97.c.iii. Boiler excess oxygen (%);
 - 97.c.iv. Pressure drop across each multiclone during testing (inches of water column).

RECORDKEEPING REQUIREMENTS

- 98. **General Recordkeeping:** The permittee must maintain the following general records where applicable for monitoring required by this permit: [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]
 - 98.a. Date, place as defined in the permit, and time of sampling or measurements;
 - 98.b. Date(s) analyses were performed;
 - 98.c. Company or entity that performed the analyses;
 - 98.d. Analytical techniques or methods used;
 - 98.e. Results of such analyses;

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- 98.f. Operating Conditions as existing at the time of sampling or measurement; and
- 98.g. Records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
- 99. **Specific Recordkeeping**: In addition to the recordkeeping required by Condition 98, the permittee must keep records of the following: [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]
 - 99.a. Occurrence and length of downtime for all pollution control devices (hours or minutes);
 - 99.b. Annual pollutant emissions calculated each month (tons/year);
 - 99.c. Excess emissions;
 - 99.d. All complaints received according to Condition 11;
 - 99.e. Monitoring log for all multiclones associated with Emission Unit EU-01 according to Condition 19:
 - 99.f. Boiler grate cleaning log according to Condition 21;
 - 99.g. Boiler operating log according to Condition 24;
 - 99.h. Records required under 40 CFR 63 subpart JJJJJJ under Condition 29;
 - 99.i. Monitoring log for pollution control devices associated with Emission Unit EU-03 according to Condition 42;
 - 99.j. Documentation demonstrating the methanol and total VOC emissions from each resin adhesive system used at the facility according to Condition 44.
 - 99.k. Standard operating procedures related to the storage and handling of VOC and HAP-containing materials according to Condition 46.
 - 99.l. Current Safety Data Sheet, or equivalent material content certification, for all VOC and HAP-containing materials used at the facility.
 - 99.m. Record of each Kiln temperature excursion and corresponding corrective action according to Condition 54.
 - 99.n. Records required under OAR 340-244 under Condition 72;
 - 99.o. Records required under 40 CFR part 63 subpart CCCCCC under Condition 88
- 100. The permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Title V Operating Permit must also be retained for at least five (5) years. [LRAPA 34-016 and OAR 340-218-0050(3)]

REPORTING REQUIREMENTS

General Reporting Requirements

- 101. <u>Excess Emissions Reporting:</u> The permittee must report all excess emissions as follows: [LRAPA 36-010, 36-025(1), 36-020, and OAR 340-218-0050(3)(c)]
 - 101.a. Immediately (within one (1) hours of the event) notify LRAPA of an excess emission event by phone, email, or facsimile; and
 - 101.b. Within 15 days of the excess emissions event, submit a written report that contains the following information:
 - 101.b.i. 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;
 - 101.b.ii. The date and time the owner or operator notified LRAPA of the event;
 - 101.b.iii. The equipment involved:
 - 101.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
 - 101.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were

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followed;

101.b.vi. 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):

101.b.vii. The final resolution of the cause of the excess emissions; and

- 101.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to LRAPA 36-040.
- 101.c. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees, or result in higher emissions associated with shutdown and subsequent start up than those emissions resulting from continued operation. The permittee may:
 - 101.c.i. Cease operation of the equipment or facility within eight (8) hours of the beginning of the period of excess emissions;
 - 101.c.ii. Request continued operation by submitting to LRAPA a written request to continue operation within eight (8) hours of the beginning of the period of excess emissions;
 - 101.c.iii. Continue operation only if approved by LRAPA in accordance with LRAPA 36-020(4). Otherwise, the permittee must cease operation within one hour of receiving LRAPA's disapproval of continued operation.
- 101.d. 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.
- 101.e. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required in LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
- 101.f. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events if required by permit condition or if it results in excess emissions. When notice is required by this condition, it must be made in accordance with condition 101.a.
- 101.g. The permittee must maintain and submit to LRAPA a log of planned and unplanned excess emissions, on LRAPA-approved forms, in accordance with LRAPA 36-025. However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period.
- 102. Permit Deviation Reporting. The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset Conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA 36-001 through 36-030 must be reported in accordance with LRAPA 36-025. [OAR 340-218-0050(3)(c)(B)]
- 103. Unless otherwise specified by permit Condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions), the missing record(s) must not be considered a permit deviation provided the data available accounts for 90% of the operating hours in a reporting period. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. [LRAPA 34-015, 34-016, and OAR 340-218-0050(3)(b)]
- 104. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5).

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[OAR 340-218-0050(3)(c)(D)]

105. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

106. The regulatory agencies' addresses are as follows, unless otherwise instructed by LRAPA:

LRAPA 1010 Main Street Springfield, OR 97477 Enforcement and Compliance Assurance Division Region 10 (20-C04) U.S. Environmental Protection Agency 1200 Sixth Avenue, Suite 155 Seattle, WA 98101

Specific Reporting Requirements

- 107. The permittee must submit three (3) copies of the semi-annual monitoring report, using LRAPA-approved forms, covering the period January 1 to June 30 *by August 15th*, and covering the period July 1 to December 31 *by March 1st*, unless otherwise approved in writing by LRAPA. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. The semi-annual monitoring report must include the semi-annual compliance certification. All instances of deviations from permit requirements must be clearly identified in such reports. [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 108. The permittee must submit three (3) copies of the annual monitoring report, covering the period January 1 to December 31, using LRAPA-approved forms, *by March 1st*. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 109. The annual monitoring report must consist of:
 - 109.a. Annual records of production and process information identified in Condition 91; [LRAPA 34-016 and OAR 340-218-0050(3)]
 - 109.b. Emission Fee Report; [OAR 340 Division 220]
 - 109.c. Excess Emissions Upset Log; [LRAPA 36-025]
 - 109.d. Second Semi-Annual Compliance Certification; [OAR 340-218-0080]
 - 109.e. Annual certification that the risk management plan is being properly implemented or confirmation that the risk management plan requirements have not been triggered according to Condition 12; [OAR 340-218-0080(7)]
 - 109.f. Annual emissions for each 12-month period; [LRAPA 34-016 and OAR 340-218-0050(3)]
 - 109.g. Biennial compliance certification, when applicable, for the wood-fired boilers in Emission Unit EU-01 according to Condition 30; and
 - 109.h. Reports required by 40 CFR part 63 subpart CCCCCC under Condition 89
- 110. <u>Greenhouse Gas Reporting:</u> The permittee must register and report in compliance with Chapter 340, Division 215 of the Oregon Administrative Rules, if the source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO₂e during the previous year. Once a source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO₂e during a year, the permittee must annually register and report in each subsequent year, regardless of the amount of the source's direct GHG emissions in future years, except as provided in OAR 340-215-0032 and OAR 340-215-0034. Air contamination sources required to register and report under OAR 340-215-0030(2) must register and submit annual emissions data reports to LRAPA under OAR 340-215-0044 by the due date for the annual report for non-greenhouse gas emissions specified in Condition 108, or by March 31 of each year, whichever is later. [OAR 340-215-0030(2) and 340-215-0046(1)(a)] This condition is enforceable only by LRAPA or DEQ.
- 111. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-

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0080(6)(c)

- 111.a. The identification of each term or condition of the permit that is the basis of the certification;
- 111.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). Note: If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
- 111.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition 111.b The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA title 12, occurred; and
- 111.d. Such other facts as LRAPA may require to determine the compliance status of the source.
- 111.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

NON-APPLICABLE REQUIREMENTS

112. The following state and federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110(1)(b)]

Rule Citation	Summary	Reason for Not Being Applicable	
40 CFR part 63 subpart DDDDD	Major Source Boiler NESHAP	Facility is a minor source of HAPs.	
40 CFR part 60 subpart Dc	Steam generating units NSPS	Boilers were installed prior to applicability date of June 9, 1989.	
40 CFR part 63 subpart DDDD	Plywood and Composite Wood Products NESHAP	Facility is a minor source of HAPs.	
LRAPA Section 33-060	Prohibited Practices and Control of Special Classes of Industry - Board Products Industries	Facility does not manufacture hardboard, particleboard, plywood, or veneer.	

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GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in the permit must have the meaning assigned to such terms in the referenced regulation.

G2. Reference Materials

Where referenced in this permit, the version of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. Source Sampling Manual; November 15, 2018 State Implementation Plan Volume 4, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the LRAPA Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee must comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance must be supplemental to, and must not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050(2)] This condition is enforceable only by LRAPA.

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G6. Credible Evidence

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [LRAPA 34-017]

G7. <u>Certification</u> [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee must promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G8. <u>Outdoor Burning</u> [LRAPA Title 47]

The permittee is prohibited from conducting outdoor burning, except as may be allowed by LRAPA 47-001 through 47-030.

G9. <u>Asbestos</u> [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0240, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee must comply with OAR 340-248-0240, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. <u>Stratospheric Ozone and Climate Protection</u> [40 CFR 82 Subpart F, OAR 340-260-0040]

The permittee must comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit must be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. such applicable requirements are included and are specifically identified in the permit, or
 - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit must alter or affect the following:
 - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. the applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or

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iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).

c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow Lane Regional Air Protection Agency, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where a Title V operating permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or LRAPA rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under Section 112(r) of the Federal Clean Air Act. The permittee must submit payment to Lane Regional Air Protection Agency, 1010 Main Street, Springfield, Oregon, 97477, within 30 days of the date LRAPA mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to LRAPA. Payment must be made regardless of the dispute. User-based fees must be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee must monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and
 - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in LRAPA Title 12.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to LRAPA and the EPA.

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c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.

d. The permit shield of Condition G11 must not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must monitor for, and record, any Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
 - i. Violate an applicable requirement;
 - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. Be a Title I modification.
- b. A minimum 7-day advance notification must be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G11 must not extend to Section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

- 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.

G17. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180.

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. <u>Construction/Operation Modification</u> [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source of air pollution control equipment in accordance with LRAPA 34-010 and 34-034 through 34-038.

G21. New Source Review Modification [LRAPA 38-0010]

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The permittee must not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010) from LRAPA and having satisfied the requirements of LRAPA Title 38 (New Source Review).

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

The permittee must furnish to LRAPA, within a reasonable time, any information that LRAPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee must also furnish to LRAPA copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to LRAPA along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
- b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and must affect only those parts of the permit for which cause to reopen exists.

G25. <u>Severability Clause</u> [OAR 340-218-0050(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit must expire at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless LRAPA requests an earlier submittal. If more than 12 months is required to process a permit renewal application, LRAPA must provide no less than six (6) months for the owner or operator to prepare an application.
- c. Provided the permittee submits a timely and complete renewal application, this permit must remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

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G28. Property Rights [340-218-0050(6)(d)]

The 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, except as provided in OAR 340-218-0110.

G29. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

The permittee must have available at the facility at all times a copy of the LRAPA Title V Operating Permit and must provide a copy of the permit to LRAPA or an authorized representative upon request.

G30. Source Test Reports [LRAPA 34-015]

Unless otherwise required by this permit, the permittee must submit all source test reports electronically.

ALL INQUIRIES SHOULD BE DIRECTED TO:

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

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ATTACHMENT A: AIR POLLUTION EMERGENCIES

Table I

AIR POLLUTION EPISODE: ALERT CONDITION

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For *Alert Conditions* due to excessive levels of carbon monoxide or ozone, persons operating motor vehicles will be requested to voluntarily curtail or eliminate all unnecessary operations within the designated *Alert Area*, and public transportation systems will be requested to provide additional services in accordance with a preplanned strategy.

Part B: Pollution Episode Conditions for Particulate Matter

For *Alert Conditions* resulting from excessive levels of particulate matter, the following measures will be taken in the designated area:

- 1. There will be no open burning by any person of any material.
- 2. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing will perform such operations only between the hours of 12 noon and 4 p.m.
- 3. Persons responsible for the operation of any source of air contaminants listed below will take all required actions for the *Alert Level*, in accordance with the preplanned strategy:

	Source of Contamination		Control Actions — Alert Level
A.	Coal, oil, or wood-fired facilities.	1)	Utilization of electric generating fuels having low ash and sulfur content.
		2)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
		3)	Diverting electric power generation to facilities outside of <i>Alert Area</i> .
В.	Coal, oil, or wood-fired process steam generating facilities.	1) 2)	Utilization of fuel having low ash and sulfur content. Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
		3)	Substantial reduction of steam load demands consistent with continuing plant operations.

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Source of Contamination	Control Actions — Alert Level
C. Manufacturing industries of the following classifications:	Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations.
 Primary Metals Industries Petroleum Refining Chemical Industries Mineral Processing Indus. Grain Industries 	Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance.
- Paper and Allied Products - Wood Processing Industry	3) Reduction of heat load demands for processing.
	4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

Table II

AIR POLLUTION EPISODE: WARNING CONDITIONS

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For *Warning Conditions*, resulting from excessive levels or carbon monoxide or ozone, the following measures must be taken:

- 1. Operation of motor vehicles carrying fewer than three (3) persons will be prohibited within designated areas during specified hours. Exceptions from this provision are:
 - A. Public transportation and emergency vehicles
 - B. Commercial vehicles
 - C. Through traffic remaining on Interstate or primary highways.
- 2. At the discretion of the Agency, operations of all private vehicles within designated areas or entry of vehicles into designated areas may be prohibited for specified periods of time.
- 3. Public transportation operators will, in accordance with a pre-planned strategy, provide the maximum possible additional service to minimize the public's inconvenience as a result of No. 1 or No. 2. above.
- 4. For ozone episodes the following additional measures will be taken:
 - A. No bulk transfer of gasoline without vapor recovery from 2:00 a.m. to 2:00 p.m.
 - B. No service station pumping of gasoline from 2:00 a.m. to 2:00 p.m.
 - C. No operation of paper coating plants from 2:00 a.m. to 2:00 p.m.
 - D. No architectural painting or auto finishing;
 - E. No venting of dry-cleaning solvents from 2:00 a.m. to 2:00 p.m. (except perchloroethylene).
- 5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists,

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governmental agencies will prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.

Part B: Pollution Episode Conditions for Particulate Matter

For Warning Conditions resulting from excessive levels of particulate matter, the following measures will be taken:

- 1. There will be no open burning by any person of any material.
- 2. The use of incinerators for the disposal of solid or liquid wastes will be prohibited.
- 3. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing will perform such operations only between the hours of 12 noon and 4 p.m.
- 4. Where legal authority exists, governmental agencies will prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.
- 5. Persons responsible for the operation of any source of air contaminants listed below will take all required actions for the *Warning Level*, in accordance with a preplanned strategy:

	Source of Contamination		Control Actions — Warning Level
A.	Coal, oil, or wood-fired electric power generating facilities.	1)	Maximum utilization of fuels having lowest ash and sulfur content.
		2)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
		3)	Diverting electric power generation to facilities outside of <i>Warning Area</i> .
		4)	Prepare to use a plan of action if an <i>Emergency Condition</i> develops.
		5)	Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
В.	Coal, oil, or wood-fired process steam generating facilities.	1)	Maximum utilization of fuels having the lowest ash and sulfur content.
		2)	Utilization of mid-day (12: 00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
		3)	Prepare to use a plan of action if an <i>Emergency Condition</i> develops.
		4)	Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.

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	Source of Contamination		Control Actions — Warning Level
C.	Manufacturing industries which require considerable lead time for shut-down including the following classifications:	1)	Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.
	Petroleum RefiningChemical IndustriesPrimary Metals IndustriesGlass IndustriesPaper and Allied Products	2)	Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.
		3)	Maximum reduction of heat load demands for processing.
		4)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence of boiler lancing or soot blowing.
D.	Manufacturing industries which require relatively short time for shut-down.	1)	Elimination of air contaminants from manufacturing operations by ceasing, allied operations to the extent possible without causing injury to persons or damage to equipment.
		2)	Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.
		3)	Reduction of heat load demands for processing.
		4)	Utilization of mid-day (12 noon to 4 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

Table III

AIR POLLUTION EPISODE: EMERGENCY CONDITIONS

EMISSION REDUCTION PLAN

- 1. There will be no open burning by any person of any material.
- 2. The use of incinerators for the disposal of solid or liquid wastes will be prohibited.
- 3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture will immediately cease operation, except the following:
 - A. Police, fire, medical and other emergency services;
 - B. Utility and communication services;
 - C. Governmental functions necessary for civil control and safety;
 - D. Operations necessary to prevent injury to persons or serious damage to equipment or property;
 - E. Food stores, drug stores and operations necessary for their supply;
 - F. Operations necessary for evacuation of persons leaving the area;

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G. Operations conducted in accordance with an approved preplanned emission reduction plan on file with the Agency.

- 4. All commercial and manufacturing establishments not included in these rules will institute such actions as will result in maximum reduction of air contaminants from their operations which emit air contaminants, to the extent possible without causing injury or damage to equipment.
- 5. The use of motor vehicles is prohibited except for the exempted functions in 3, above.
- 6. Airports will be closed to all except emergency air traffic.
- 7. Where legal authority exists, governmental agencies will prohibit all use of wood stoves and fireplaces.
- 8. Any person responsible for the operation of a source of atmospheric contamination listed below will take all required control actions for this *Emergency Level*.

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	Source of Contamination		Control Actions — Emergency Level
A.	Coal, oil, or wood-fired electric power generating facilities.	1)	Maximum utilization of fuels having lowest ash and sulfur content.
		2)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.
		3)	Diverting electric power generation to facilities outside of Emergency area.
		4)	Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
В.	Coal, oil, or wood-fired steam generating facilities.	1)	Reducing heat and steam process demands to absolute necessities consistent with preventing equipment damage.
		2)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
		3)	Taking the action called for in the emergency plan.
		4)	Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.

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	Source of Contamination		Control Actions — <i>Emergency Level</i>
C.	Manufacturing industries of the following classifications: - Primary Metals Industry - Petroleum Refining Operations - Chemical Industries - Mineral Processing Industries - Paper and Allied Products	1)	The elimination of air of contaminants from manufacturing operations by ceasing, curtailing, postponing or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment. Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases,
	- Grain Industry - Wood Processing Industry	2)	vapors, or malodorous substances.
		3)	Maximum reduction of heat load demands for processing.
		4)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

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