



LANE REGIONAL AIR PROTECTION AGENCY  
TITLE V OPERATING PERMIT

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

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

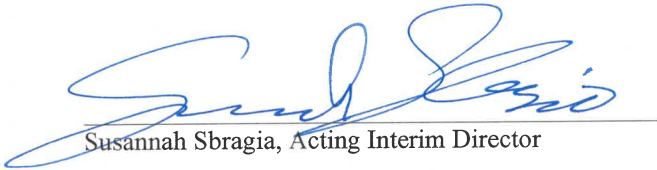
ISSUED TO:  
**Swanson Group Mfg. LLC**  
**Springfield Plywood/Veneer**  
1651 South F Street  
Springfield, Oregon 97477

INFORMATION RELIED UPON:  
Agency-initiated Modification

PLANT SITE LOCATION:  
1651 South F Street  
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:  
Issued by: City of Springfield  
Dated: December 3, 2001

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

  
Susannah Sbragia, Acting Interim Director

September 26, 2023  
Date

<u>NATURE OF BUSINESS:</u>	<u>SIC</u>	<u>NAICS</u>
Veneer And Plywood/Panel Products Manufacturing	2436	321212
Fuel Burning Equipment (Boilers)	4961	221330

RESPONSIBLE OFFICIAL:  
  
Title: Vice President of Manufacturing  
Phone: (541) 761-0533

FACILITY CONTACT PERSON:  
  
Name: Jay Yates  
Title: Corporate Steam Manager/Environmental Manager  
Phone: (541) 832-1412

**ADDENDUM NO. 1**  
**(Minor Permit Modification)**

In accordance with OAR 340-218-0170(1)(a) and 40 CFR 60 subpart IIII, Title V Operating Permit No. 207510 is hereby amended to include regulations applicable to the 2018 model year 35-kW diesel-fired emergency generator (CIA-Emergency Generator). The permit will be amended to insert the applicable language from 40 CFR 60 subpart IIII for CIA-Emergency Generator in Conditions 81 through 86. The revisions are as follows:

**Categorically Insignificant Activity (CIA-Emergency Generator) Specific Emission Limits and Standards**

40 CFR 60 Subpart IIII—Standards of Performance for Stationary Compression Ignition Internal Combustion Engines [LRAPA 46-535(3)(cccc)]

81. Applicable Requirements: For engines with a rated power greater than or equal to 37 KW (50 HP), the permittee must own and operate an engine that meets the Tier 2 or Tier 3 emission standards for new nonroad CI engines for the same rated power as described in Conditions 81.a for all pollutants and the smoke standards as specified in Condition 81.b beginning in model year 2007. [40 CFR 60.4202(a)(2)]

81.a. The permittee must comply with the Tier 3 standards as summarized in the following table: [40 CFR 1039, Appendix I, Table 3 – Tier 3 Emission Standards]

Rated Power	Table 3 to Appendix I – Tier 3 Emission Standards			
	Starting Model Year	NO <sub>x</sub> + NMHC (g/kW-hr)	CO (g/kW-hr)	PM (g/kW-hr)
37≤KW<75	2008	4.7	5.0	0.40

81.b. The permittee must not exceed the following smoke standards: [40 CFR 1039.105(b)]

81.b.i. 20 percent during the acceleration mode. [40 CFR 1039.105(b)(1)]

81.b.ii. 15 percent during the lugging mode. [40 CFR 1039.105(b)(2)]

81.b.iii. 50 percent during the peaks in either the acceleration or lugging modes. [40 CFR 1039.105(b)(3)]

82. Applicable Requirement: The permittee must operate and maintain stationary CI ICE that achieves the emission standards as required in Condition 81 over the entire life of the engine. [40 CFR 60.4206]

83. Applicable Requirement: A permittee that owns and operates a stationary CI ICE subject to 40 CFR 60 subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the following requirements for nonroad diesel fuel: [40 CFR 60.4207(b)]

83.a. Sulfur standard. Maximum sulfur content of 15 ppm. [40 CFR 1090.305(b)]

83.b. Cetane index or aromatic content. Diesel fuel must meet one of the following standards: [40 CFR 1090.305(c)]

83.b.i. Minimum cetane index of 40. [40 CFR 1090.305(c)(1)]

83.b.ii. Maximum aromatic content of 35 volume percent. [40 CFR 1090.305(c)(2)]

84. Monitoring Requirement: If the permittee owns or operates an emergency stationary ICE, the permittee must operate the emergency stationary ICE according to the requirements in Conditions 84.a and 84.b. In order for the engine to be considered an emergency stationary ICE under 40 CFR 60 subpart IIII, any operation other than emergency operation, maintenance and testing, and operation in non-emergency situations for 50 hours per year, as described in Conditions 84.a and 84.b, is prohibited. If the permittee does not operate the engine according to the requirements in Conditions 84.a and 84.b, the engine will not be considered an emergency engine under 40 CFR 60 subpart IIII and must meet all requirements for non-emergency engines. [40 CFR 60.4211(f)]

84.a. There is no time limit on the use of emergency stationary ICE in emergency situations. [40 CFR 60.4211(f)(1)]

84.b. The permittee may operate the emergency stationary ICE for any combination of the purposes

specified in Condition 84.b.i. for a maximum of 100 hours per calendar year. [40 CFR 60.4211(f)(2)]

84.b.i. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition LRAPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [40 CFR 60.4211(f)(2)(i)]

85. Recordkeeping Requirement: The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [40 CFR 60.4214(b)]

86. Recordkeeping Requirement: The permittee must keep documentation that the engine is certified by the manufacturer to meet the emission limitations in Conditions 81. [LRAPA 34-016]

KE/cmw  
8/18/2023



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ISSUED TO:

**Swanson Group Mfg. LLC**  
**Springfield Plywood/Veneer**  
1651 South F Street  
Springfield, Oregon 97477

INFORMATION RELIED UPON:

Application Number: 66086  
Received: 02/26/2020

PLANT SITE LOCATION:

1651 South F Street  
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield  
Dated: December 3, 2001

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

A handwritten signature in blue ink that reads "Steven A. Dietrich".

Steven A. Dietrich, Director

A handwritten date in blue ink that reads "7-22-22".

Date

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NATURE OF BUSINESS:

Veneer And Plywood/Panel Products Manufacturing  
Fuel Burning Equipment (Boilers)

SIC

2436  
4961

NAICS

321212  
221330

RESPONSIBLE OFFICIAL:

Title: Vice President of Manufacturing  
Phone: (541) 761-0533

FACILITY CONTACT PERSON:

Name: Jay Yates  
Title: Corporate Steam Manager/Environmental Manager  
Phone: (541) 832-1412

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**LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT**

ACDP	Air Contaminant Discharge Permit	MSF	1,000 Square feet 3/8” basis
Act	Federal Clean Air Act	MSDS	Material Safety Data Sheets
ASTM	American Society of Testing and Materials	NA	Not applicable
BDT	Bone dry ton	NESHAP	National Emission Standard for Hazardous Air Pollutants
BDU	Bone dry unit	NO <sub>x</sub>	Nitrogen oxides
BF	Board feet	NSPS	New Source Performance Standards
Btu	British thermal unit	O <sub>2</sub>	Oxygen
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
CO	Carbon Monoxide	ODEQ	Oregon Department of Environmental Quality
CO <sub>2</sub>	Carbon Dioxide	ORS	Oregon Revised Statutes
CO <sub>2</sub> e	Carbon Dioxide Equivalent	OSHA	Occupational Safety and Health Administration
CPMS	Continuous parameter monitoring system	O&M	Operation and maintenance
Day	A calendar 24-hour period	Pb	Lead
DEQ	Department of Environmental Quality	PCD	Pollution Control Device
dscf	Dry standard cubic feet	PM	Particulate matter
EF	Emission factor	PM <sub>10</sub>	Particulate matter less than 10 microns in size
ERC	Emission Reduction Credit	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppmv	Parts per million by volume
EPI	Epichlorohydrin	ppm	Parts per million
EU	Emissions Unit	PSEL	Plant Site Emission Limit
FCAA	Federal Clean Air Act	psia	Pounds per square inch, actual
FSA	Fuel sampling and analysis	RMP	Risk Management Plan
GHG	Greenhouse Gas	RTO	Regenerative Thermal Oxidizer
gr/dscf	Grain per dry standard cubic foot (1 pound=7000 grains)	SERP	Source emissions reduction plan
HAP	Hazardous Air Pollutant as defined by OAR 244-0040	SO <sub>2</sub>	Sulfur dioxide
HCFC	Halogenated Chloro-Fluoro-Carbon	ST	Source test
HCOH	Formaldehyde	TPY	Tons per year, (short ton=2000 lbs)
ID	Identification number	UF	Urea Formaldehyde
I&M	Inspection and maintenance	UFC	Urea-Formaldehyde Concentrate
LRAPA	Lane Regional Air Protection Agency	VE	Visible emissions
M	1,000	VMT	Vehicle miles traveled
MM	1,000,000	VOC	Volatile organic compounds
Month	Calendar month	Week	Calendar week starting at 12:01 am on Sunday morning
MB	Material Balance	Year	A period consisting of any 12-consecutive calendar months
MBF	1,000 Board feet		

**DEFINITIONS**

**Modified EPA Method 9:** As used in this permit “Modified EPA Method 9” is defined as follows:

Opacity must be measured in accordance with EPA Method 9 using the data reduction procedures in EPA Method 203B. For all standards, the minimum observation period must be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. See also the definition of “Opacity” in LRAPA title 12.

**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.  
 [LRAPA 34-180, OAR 340-218-0010 and OAR 340-218-0120(2)]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA and citizens under the Clean Air Act, except as specified below:
  - 2.a. Conditions 7, 8, 9 and G5 and G9 (LRAPA Title 43) are only enforceable by LRAPA.  
 [OAR 340-218-0060]

**EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION**

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

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
<b>Boilers</b> Boiler-1 (B-1) Boiler-2 (B-2)	EU-1	Multiclone Multiclone	MC-1 MC-2
<b>Plywood Presses</b> Press #1 (P-1) Press #2 (P-2) Press #3 (P-3) Press #4 (P-4) Press #5 (P-5)	EU-2	None	None
<b>Veneer Dryers</b> Veneer Dryer #1 (VD-1) Veneer Dryer #2 (VD-2)	EU-3	Regenerative Thermal Oxidizer	RTO
<b>Mill Equipment</b> Core Saw, Strip Saw, Raute P-2 Robot Plugger Line, Veneer Scarfer & Edge Gluer, Panel Saw, Dry Hog, Composer Hog Fines Target Box Panel Sanding Line Sander Dust Fuel Silo Bin Vent Hog Fuel Bin	EU-4	Baghouse #1  Baghouse #2 Filter #3 Cyclone #8	Bag-1  Bag-2 Bag-3 C-8
<b>Fugitive Sources</b> Hog Fuel Pile (VOC only) Chippers/Hogs (VOC only) Block Conditioning Vault (VOC only) Material Handling (PM/PM <sub>10</sub> /PM <sub>2.5</sub> )	EU-5	None	None
<b>Aggregate Insignificant (AI) Activities</b> Truck Load Out Debarkers Veneer Lathes Resin and Glue Tanks	AI	None	None
<b>Categorically Insignificant Activity</b> Emergency Generator: 35 kW, diesel-fired	CIA	None	None

**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 Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015(1)	4	Fugitive Emissions	Minimize	Recordkeeping	5, 6
49-010(1)	7	Nuisance	No nuisance	Recordkeeping	8
32-055	9	PM fallout	No deposition of PM >250µm on others' property	Recordkeeping	10
32-090(1)	11	Injury or damage to persons or property	Prohibited	Recordkeeping	12
51-015	13	Source Emission Reduction Plan	Reduce Emissions	Recordkeeping	14
32-065(1)&(2)	15	Fuel oil sulfur content specifications	Percent by weight sulfur	Recordkeeping	16
40 CFR Part 68	17	Risk management	Risk management plan	NA	17
LRAPA title 33 – Section 33-060 Board Products Industries	18	PM	82.0 lb/hour	Once per 8-hour shift recordkeeping	19

4. Applicable Requirement: The permittee must not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but not be limited to the following: [LRAPA 48-015(1)]
  - 4.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;
  - 4.b. Application of water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - 4.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;
  - 4.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - 4.e. Adequate containment during sandblasting or other similar operations;
  - 4.f. The covering of moving, open bodied trucks transporting materials likely to become airborne; and
  - 4.g. The prompt removal from paved streets of earth or other material which does or may become airborne.



5. **Monitoring Requirement:** At least once each week for a minimum period of 30 minutes, the permittee must visually survey the facility using EPA Method 22 for any sources of excess fugitive emissions. For purposes of this condition, excess fugitive emissions are visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period. The minimum observation time must be at least six (6) minutes. The person conducting the observation must follow EPA Method 22. If sources of excess fugitive emissions are identified, the permittee must: [LRAPA 34-016, LRAPA 48-015(2)&(3) and OAR 340-218-0050(3)(a)]
  - 5.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 4; or
  - 5.b. Develop an LRAPA-approved Fugitive Emission Control Plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
6. **Recordkeeping Requirement:** The permittee must maintain records of the fugitive emissions surveys and corrective actions, as applicable. The record must be maintained onsite for a period of at least five (5) years and must be provided to LRAPA personnel on request. [LRAPA 34-016 and OAR 340-218-0050(3)(b)]

#### **Nuisance Conditions**

7. **Applicable Requirement:** 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 enforceable only by LRAPA.
8. **Monitoring and Recordkeeping Requirement:** The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include the date of complaint, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and date and time of response to complainant. A facility representative must immediately investigate the condition following the receipt of a nuisance complaint and a facility representative must provide a response to the complainant, if possible, within 24 hours, but not longer than five (5) working days. [LRAPA 34-016 and OAR 340-218-0050(3)(a)] This condition is enforceable only by LRAPA.
9. **Applicable Requirement:** The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at such duration and 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. **Monitoring Requirement:** The permittee must monitor compliance with Condition 9 using the facility inspections required in Condition 5. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
11. **Applicable Requirement:** 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 to be made by LRAPA. [LRAPA 32-090(1)]
12. **Monitoring Requirement:** The permittee must monitor compliance with the applicable requirements in Condition 11 using the compliance certifications required in Conditions 71.a and 71.b.iii. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
13. **Applicable Requirement:** In the event that an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee must take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee must take action when the permittee first becomes aware of such declaration whether through news media or direct contact with LRAPA.

14. Monitoring and Recordkeeping Requirement: The permittee must maintain a record (log) of air pollution episodes and emission reduction actions taken and must provide the log to LRAPA upon request. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]

#### **Fuel Conditions**

15. Applicable Requirement: The permittee must only burn fuel oils that meet the following specifications: [LRAPA 32-065]
- 15.a. Distillate fuel oil or on-specification used oil (as defined in 40 CFR 279.11) must not contain more than:
- 15.a.i. 0.3% sulfur by weight for ASTM Grade 1 fuel oil; [LRAPA 32-065(2)(a)]
- 15.a.ii. 0.5% sulfur by weight for ASTM Grade 2 fuel oil. [LRAPA 32-065(2)(b)]
- 15.b. Residual fuel oils must not contain more than 1.75% sulfur by weight. [LRAPA 32-065(1)]
16. Monitoring Requirement: The permittee must monitor the sulfur content of each shipment of fuel oil (ASTM Grade 1 or ASTM Grade 2) that will be used in auxiliary equipment other than exempt equipment such as forklifts and motor vehicles by: [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
- 16.a. Obtaining a certification of sulfur content from each vendor for each shipment of fuel received; or
- 16.b. Secure a SDS from the fuel supplier and a certification stating that the supplier will provide only fuel oil that meets the specifications in Condition 15 for use in non-exempt or auxiliary equipment such as stationary fire water pump motors.

#### **Accidental Release Prevention**

17. Applicable Requirement: Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then 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]

#### **LRAPA Title 33 – Section 33-060 Board Products Industries**

18. Applicable Requirement: The permittee must not cause or allow the emission of particulate matter from veneer and plywood mill sources (EU-2, EU-3, EU-4, and EU-5) in excess of a total from all sources within the plant site of an average hourly emission rate of 82.0 pounds per hour based on the maximum hourly production capacity of the facility times one (1.0) pound per 1000 square feet of production. [LRAPA 33-060(3)(b)]
19. Monitoring and Recordkeeping Requirement: To demonstrate compliance with the emission limit specified in Condition 18, the permittee must maintain records once per 8-hour shift showing that the average amount of veneer dried during the 8-hour shift does not exceed 82,000 square feet/hour on a 3/8" basis of finished product equivalent. [LRAPA 33-060(3)(b)]

**INDIVIDUAL EMISSION-UNIT-SPECIFIC EMISSION LIMITS AND STANDARDS**

**Emissions Unit EU-1 (Boiler-1 & Boiler-2) Specific Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-010(4)(b)	20	Visible Emissions	20% opacity; 3-minute aggregate in 60 minutes	Periodic VE observations	21, 22
32-020(1)(b)(B)	23	Grain Loading	0.15 gr/dscf	Compliance Testing, Recordkeeping	23.a, 24
40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	27	PM	Emission Action Level/Indicator Range	O&M, Recordkeeping	27.a, 27.b
40 CFR Part 63, Subpart JJJJJ	28	HAP	Compliance Certification	Initial Tune-Up, Energy Assessment	28.a, 28.b
	29	HAP	General Compliance	Best Practices	29
	30	HAP	Work Practices	Biennial Tune-up	31, 32

20. Applicable Requirement: The permittee must not emit or allow to be emitted any visible emissions from wood-fired boilers installed, constructed, or modified prior to June 1, 1970, that equal or exceed: [LRAPA 32-010(4)(b) and OAR 340-208-0110(5)(b)]
- 20.a. An average of 20 percent opacity for a period or periods aggregating more than three minutes in any one hour, with one or more of the following exceptions:
- 20.a.i. Visible emissions may equal or exceed 20 percent opacity but may not equal or exceed 40 percent opacity, as the average of all three-minute aggregate periods during grate cleaning operations provided the grate cleaning is performed in accordance with a grate cleaning plan approved by LRAPA; or
- 20.a.ii. LRAPA may approve, at the permittee’s request, a boiler specific limit greater than 20 percent opacity for a period or periods aggregating more than three minutes in any one hour, but not to equal or exceed 40 percent opacity for a period or periods aggregating more than three minutes in any one hour, based on the opacity measured during a source test that demonstrates compliance with LRAPA 32-020(2) as provided below:
- 20.a.ii.A. Opacity must be measured for at least 60 minutes during each compliance source test run using any method included in LRAPA 32-010(2);
- 20.a.ii.B. The boiler specific limit will be the average of at least 30 three-minute aggregate periods obtained during the compliance source test;
- 20.a.ii.C. The boiler specific limit will include a higher limit for one three-minute aggregate period during any hour based on the maximum three-minute aggregate periods measured during the compliance source test; and
- 20.a.ii.D. Specific opacity limits will be included in the permit for each affected source as a minor permit modification (simple fee).

21. Monitoring Requirement: At least monthly, the permittee must monitor visible emissions from the boilers in EU-1 by conducting a visual emissions survey utilizing Modified EPA Method 9. Each Modified EPA Method 9 test must be a minimum of six (6) minutes long unless any one (1) reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 20 is documented, whichever period is shorter. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
  - 21.a. If any Modified EPA Method 9 test result exceeds the applicable standard in Condition 20, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable.
  - 21.b. If an exceedance of the opacity limit specified in Condition 20 for either Boiler-1 or Boiler-2 occurs, the permittee must increase the frequency of visible emissions surveys for both boilers to weekly until six (6) consecutive weeks of operation show opacity less than the opacity limit specified in Condition 20, then the visible emissions survey frequency may revert back to a monthly schedule.
  - 21.c. The permittee must also conduct visible emissions surveys during operating conditions such as breakdown, upset, maintenance, and excursions of parametric monitoring requirements that may result in an emission limit exceedance.
  - 21.d. If the permittee is unable to conduct the Modified 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 such as fog, heavy rain, or snow, the permittee must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the visible emissions surveys at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
22. Recordkeeping Requirement: The permittee must maintain records of all visible emissions surveys, including but not limited to the following: date, time, operating conditions, observer, results, weather conditions and any corrective actions taken. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
23. Applicable Requirement: The permittee must not cause, suffer, allow, or permit particulate matter emissions from the boilers in EU-1 in excess of the following limits: 0.15 grains per standard cubic foot, corrected to 12% CO<sub>2</sub> from Boiler-1 or Boiler-2. [LRAPA 32-020(1)(b)(B) and LRAPA 32-020(5)(a)]
  - 23.a. Monitoring and Recordkeeping Requirement: The permittee must demonstrate compliance with Condition 23 by performing the compliance monitoring required by Conditions 21. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
24. Testing Requirement: Within one (1) year prior to the expiration date of this permit, the permittee must demonstrate compliance with the emission limits specified in Condition 23 by conducting a source test for particulate matter for Boiler-1 and Boiler-2 in EU-1. [LRAPA 35-0120(1)]
  - 24.a. Unless otherwise specified in this permit, the permittee must conduct all testing required by this permit in accordance with the ODEQ Source Sampling Manual.
  - 24.b. ODEQ Method 5 and EPA Methods 1 through 4 must be used for measuring particulate matter from the boilers. Each test run must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 dry standard cubic feet (dscf). Test results must be reported as grains per dry standard cubic feet (gr/dscf), gr/dscf corrected to 12% CO<sub>2</sub>, pounds per hour, and pounds per 1000 pounds of steam produced.
  - 24.c. During the compliance demonstration, Boiler-1 and Boiler-2 in EU-1 must operate at levels that equal or exceed ninety-percent (90%) of normal maximum operating rates. For the purposes of this permit, the normal maximum operating rate is defined as the 90<sup>th</sup> percentile of all hourly operating rates during the 12-month period immediately preceding the source test. Boiler

- operating rates must be reported in pounds of steam per hour (lb-steam/hr).
- 24.d. Only regular operating staff may adjust the process or emission control device parameters during a compliance test and within two (2) hours prior to the test. 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.
- 24.e. 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. There must be at least two (2) valid test runs for a source test to be accepted.
- 24.f. A report, which includes the results of the source test, must be submitted to LRAPA for review and approval within 60 days of completing the source test, unless otherwise approved by LRAPA.
- 24.g. During each test run, the permittee must record the following information:
- 24.g.i. Visible emissions as measured in accordance with Modified EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 5 test run, unless weather conditions are such that it is not possible to read opacity;
  - 24.g.ii. Boiler steam production rates (lb/hr);
  - 24.g.iii. Excess boiler oxygen (%);
  - 24.g.iv. Pressure drop across the multiclones during testing; and
  - 24.g.v. Estimated percentage by weight of sanderdust and hogged fuel combusted.
- 24.h. In the event that the permittee has not operated a boiler for the six (6) months immediately preceding a source test required by this condition, testing of the idled boiler is not required. However, upon start-up of a boiler that is not tested due to non-operative status, the permittee must conduct testing as specified in Condition 24 within six (6) months of start-up.
25. Monitoring Requirements: The permittee must install, calibrate, maintain, operate, and record the output of a continuous monitoring system for measuring the excess oxygen from each boiler. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
- 25.a. Real-time data must be displayed at least once each minute that each boiler in EU-1 is in operation. Hourly averages of the data must be recorded at the end of each clock-hour that each boiler is in operation and to determine a valid hourly average a minimum of 50 percent of the data points collected during the hour must be valid. Minimum data availability of the hourly averages must be 90% for each month and year. Monitor availability must be determined excluding periods of calibration and routine maintenance.
- 25.b. The permittee must perform correction actions anytime the excess oxygen level in either boiler in EU-1 is less than the lowest hourly average oxygen concentration measured during the most recent performance test. The corrective action must return the boiler(s) in EU-1 to operating at excess oxygen levels above the lowest hourly average values established in the most recent performance test.
26. Recordkeeping Requirement: The permittee must maintain records of data availability, periods of excess oxygen excursions, and corrective actions taken, as applicable. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
27. Applicable Requirement: The permittee must operate, inspect, and monitor multiclones MC-1 and MC-2 to ensure emission reduction is at the highest reasonable efficiency and effectiveness. The permittee must inspect multiclones MC-1 and MC-2 annually, or during each boiler shutdown, whichever is sooner for signs of physical degradation that could affect performance of the control device. Any necessary repair or maintenance must be performed prior to restarting boilers. [40 CFR Part 64, LRAPA 32-007(1) and LRAPA 32-007(2)]

- 27.a. Results of all multiclone inspection, maintenance, and repair must be documented in an operating log.
- 27.b. The permittee must install, calibrate, maintain, operate, and record the output of a pressure gauge for measuring the pressure drop across each multiclone control device.
  - 27.b.i. The permittee must record pressure drop across the multiclones each operating day.
  - 27.b.ii. The permittee must perform corrective action anytime the daily pressure drop is outside of the ranges listed in the table below for any multiclone in EU-1.

Multiclone ID	Pressure Drop Range (inches H <sub>2</sub> O)
MC-1	1.0 to 6.0
MC-2	1.0 to 6.0

- 27.b.iii. The permittee must record all pressure drop excursions, the corrective action taken, and the results of any Modified EPA Method 9 tests conducted.
- 27.b.iv. If, within three (3) hours of a pressure drop excursion, corrective action cannot be initiated or is deemed ineffective, the permittee must perform a Modified EPA Method 9 test. Within four (4) hours of the excursion, the permittee must notify LRAPA of the excursion and report the results of the Modified EPA Method 9 test.
- 27.b.v. The permittee must report the number of pressure drop excursions that occurred during the reporting period in the semi-annual monitoring report required by Condition 71.
- 27.b.vi. The differential pressure gauges for MC-1 and MC-2 must be operated in accordance with the manufacturer's written instructions. At a minimum, the differential pressure gauges must be calibrated with a manometer once per year.
- 27.b.vii. If the pressure is fluctuating by more than one (1) inch of water column when taking the daily readings, the permittee must record the average of three readings during a one-minute period.
- 27.b.viii. The permittee is not required to monitor daily pressure drop readings for MC-1 or MC-2 when their associated boiler in EU-1 is not operating.

**Area Source Boiler NESHAP**

40 CFR 63 Subpart JJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources [LRAPA 44-150(5)(jjjj)]

- 28. Applicable Requirement: Compliance Dates – The permittee must achieve compliance with the applicable provisions in Conditions 28.a and 28.b no later than March 21, 2014. [40 CFR 63.11196(a)]
  - 28.a. [Reserved] Condition 28.a requirement met. The permittee certified compliance with the initial tune-up requirement of the NESHAP on September 14, 2011 in accordance with 40 CFR 63.11196(a)(1).
  - 28.b. [Reserved] Condition 28.b met. The permittee completed the energy assessment requirement of the NESHAP for both boilers in EU-1 on November 6, 2013 in accordance with 40 CFR 63.11196(a)(3).
- 29. Applicable Requirement: General Compliance – The permittee must at all times operate and maintain the boilers in EU-1, 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. [40 CFR 63.11205(a)]

30. Applicable Requirement: Biennial Tune-Up – The permittee must conduct a performance tune-up of the boilers in EU-1 biennially to demonstrate continuous compliance as specified in Conditions 30.a through 30.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. [40 CFR 63.11223(a) and 40 CFR 63.11223(b)]
- 30.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). [40 CFR 63.11223(b)(1)]
- 30.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. [40 CFR 63.11223(b)(2)]
- 30.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 scheduled unit shutdown, not to exceed 36 months from the previous inspection). [40 CFR 63.11223(b)(3)]
- 30.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. [40 CFR 63.11223(b)(4)]
- 30.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)]
- 30.f. Maintain on-site and submit, if requested by LRAPA, a report containing the information as follows: [40 CFR 63.11223(b)(6)]
- 30.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. [40 CFR 63.11223(b)(6)(i)]
- 30.f.ii. A description of any corrective actions taken as a part of the tune-up of the boiler. [40 CFR 63.11223(b)(6)(ii)]
- 30.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. [40 CFR 63.11223(b)(6)(iii)]
- 30.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. [40 CFR 63.11223(b)(7)]
31. Reporting Requirements: The permittee must prepare, by February 15 of each applicable year, and submit to the LRAPA upon request, a biennial compliance certification report for the previous calendar year containing the information specified in Conditions 31.a through 31.c. The permittee must submit the biennial report in the appropriate annual report, as specified in Condition 71.b.iii, if the permittee had any instance described by Condition 31.c. [40 CFR 63.11225(b) and 40 CFR 63.10(a)(5)]

- 31.a. Company name and address. [40 CFR 63.11225(b)(1)]
  - 31.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: [40 CFR 63.11225(b)(2)]
    - 31.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." [40 CFR 63.11225(b)(2)(i)]
    - 31.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." [40 CFR 63.11225(b)(2)(ii)]
    - 31.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." [40 CFR 63.11225(b)(2)(iii)]
  - 31.c. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of the deviations, the time periods during which the deviations occurred, and the corrective action taken. [40 CFR 63.11225(b)(3)]
32. Recordkeeping Requirements: The permittee must maintain the records specified in Conditions 32.a through 32.e: [40 CFR 63.11225(c)]
- 32.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. [40 CFR 63.11225(c)(1)]
  - 32.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: [40 CFR 63.11225(c)(2)]
    - 32.b.i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [40 CFR 63.11225(c)(2)(i)]
    - 32.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). [40 CFR 63.11225(c)(2)(ii)]
    - 32.b.iii. For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report. [40 CFR 63.11225(c)(2)(iii)]



- 32.c. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [40 CFR 63.11225(c)(4)]
  - 32.d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §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. [40 CFR 63.11225(c)(5)]
  - 32.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. [40 CFR 63.11225(d)]
33. 40 CFR Part 63 General Provisions according to Table 8 of 40 CFR 63 Subpart JJJJJ, incorporated by reference. [40 CFR 63.11235]

**Emissions Unit EU-2 (Plywood Presses) Specific Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-010(1)&(3)	34	Visible Emissions	20% opacity; 3-minute aggregate in 60 minutes	Periodic VE observations, Recordkeeping	35, 36
32-015(2)(c)	37	Grain Loading	0.10 gr/dscf	Periodic VE observations, Recordkeeping	38

34. Applicable Requirement: The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour from the plywood presses in EU-2. The emission standard in this condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)&(3)]
35. Monitoring Requirements: At least once per calendar quarter, the permittee must monitor visible emissions from the press vents in EU-2 in accordance with the following procedures and test methods: [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 35.a. Modified EPA Method 9 must be used to determine opacity, in accordance with the ODEQ Source Sampling Manual. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
- 35.b. All visible emissions observations must be conducted during operating conditions that have the potential to create visible emissions.
- 35.c. If the permittee is unable to conduct the Modified EPA Method 9 tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the permittee must note such conditions on the data observation sheet. The permittee must make at least three (3) attempts to conduct the Modified EPA Method 9 tests at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
36. Recordkeeping Requirement: All visible emissions observations must be recorded in a log that includes the following information: [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 36.a. Name of observer,
- 36.b. Date of observation(s),
- 36.c. Time of observation(s),
- 36.d. Operating conditions during observations (press cycle time, board thickness, ply number, press temperature),
- 36.e. Results of observation(s), and
- 36.f. Weather conditions during observations.
37. Applicable Requirement: The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grains per dry standard cubic foot, from the press vents within EU-2. [LRAPA 32-015(2)(c)]
38. Monitoring and Recordkeeping Requirement: The permittee must demonstrate compliance with Condition 37 by performing the compliance monitoring required by Conditions 35 and 36. [LRAPA 35-0120 and OAR 340-218-0050(3)]

**Emissions Unit EU-3 (Veneer Dryers) Specific Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	
				Method	Condition Number
33-060(3)(a)(B)(i)	39.a	Visible Emissions	10% average opacity, 2 days within any 12-month period separated by at least 30 days	Periodic VE observations, Recordkeeping	40, 41
33-060(3)(a)(B)(ii)	39.b	Visible Emissions	20% maximum opacity, at any time	Periodic VE observations Recordkeeping	40, 41
32-030(2)	42	Particulate Matter	0.10 gr/dscf	Periodic VE observations, Recordkeeping	43
33-060(3)(a)(E)	44	Highest and Best Control	At least 90% VOC destruction; Operation and Maintenance	O&M, Recordkeeping	45
32-007(1)	46	Fugitive Emissions	Minimize	I&M Plan	47

39. Applicable Requirement: The permittee must not operate any veneer dryer in EU-3 such that visible air contaminants emitted from any dryer stack or emission point exceed: [LRAPA 33-060(3)(a)(B)]
- 39.a. A daily average operating opacity of 10 percent on more than two days within any 12-month period, with the days separated from each other by at least 30 days, as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(i)]
- 39.b. A maximum opacity of 20 percent at any time as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(ii)]
40. Monitoring Requirements: At least monthly, the permittee must monitor the visible emissions from the stack of the RTO by conducting a visual emissions survey utilizing EPA Method 9. The permittee must monitor the visible emissions at least hourly during any thermal bake-out of the RTO by conducting an EPA Method 9 test. [LRAPA 35-0120 and OAR 340-218-0050(3)(a)]
- 40.a. If an exceedance of the opacity limit occurs, except during a thermal bake-out event, the frequency of visible emissions surveys must be increased to weekly until six (6) consecutive weeks of operation show opacity less than the 10% limit, then the visible emissions survey frequency may revert to a monthly schedule.
- 40.b. Visible emissions survey must be conducted during any operating condition that may result in an exceedance of the emission limits established in Condition 39, such as RTO failure, veneer dryer upset or maintenance, or excursions of parametric monitoring setpoints.
- 40.c. If the permittee is unable to conduct the visual emissions survey due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the permittee must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the visual emissions survey at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
41. Recordkeeping Requirements: The permittee must maintain records of the visible emissions surveys required in Condition 40 and corrective actions, as applicable. The record must be maintained onsite for a period of a least five (5) years and must be provided to LRAPA personnel on request. [LRAPA 34-016 and OAR 340-218-0050(3)(b)]
- 41.a. All visible emissions survey records must include the following information:

- 41.a.i. Name of observer,
  - 41.a.ii. Date of observation(s),
  - 41.a.iii. Time of observation(s),
  - 41.a.iv. Operating conditions during observations (production rates, species of veneer dried, amount of veneer dried (1000 sqft/hr on a 3/8" basis), amount of redry, dryer conditions including dryer temperatures by zone and drying time, and RTO combustion chamber temperatures),
  - 41.a.v. Results of observation(s), and
  - 41.a.vi. Weather conditions during observations
42. Applicable Requirement: The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grains per dry standard cubic foot, from EU-3. [LRAPA 32-015(2)(c)]
43. Monitoring and Recordkeeping Requirement: The permittee must demonstrate compliance with Condition 42 by performing the compliance monitoring required by Conditions 40 and 41. [LRAPA 35-0120 and OAR 340-218-0050(3)]
44. Applicable Requirement: The permittee must maintain and operate each veneer dryer in EU-3 at all times such that air contaminant generating processes and all contaminant control equipment function at full efficiency and effectiveness so that the emissions of all air contaminants are kept at the lowest practicable levels. [LRAPA 33-060(3)(a)(E)]
- 44.a. The permittee must maintain the RTO such that VOC emissions are reduced by a minimum of 90%.
45. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Condition 44.a by monitoring the RTO combustion chamber temperature and the RTO operation as follows: [LRAPA 32-007(1) and OAR 340-218-0050(3)]
- 45.a. The permittee must operate, maintain, and inspect the RTO temperature sensor as follows:
- 45.a.i. Locate the temperature sensor in a position that provides a representative temperature.
  - 45.a.ii. Use a temperature sensor with a minimum accuracy of 4 degrees Fahrenheit (°F) or 0.75 percent of the temperature value, whichever is larger.
  - 45.a.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.
  - 45.a.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.
  - 45.a.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
  - 45.a.vi. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.
- 45.b. The permittee must maintain the 3-hour block average firebox temperature in the RTO above the minimum temperature established during the initial performance test.
- 45.b.i. The permittee must take corrective action anytime the 3-hour block average firebox

temperature in the RTO is less than the minimum combustion temperature established during the initial performance test.

- 45.c. Every six (6) months the permittee must inspect the RTO for physical degradation that could affect the performance of the control device. The permittee must make all necessary repairs to the RTO to ensure efficient operation. The results of the inspection and any repair activities must be recorded in inspection and maintenance logs.
- 46. Applicable Requirement: At least weekly, the permittee must inspect the dryers for fugitive emissions in accordance with an inspection and maintenance plan. [LRAPA 32-007(1)]
- 47. Monitoring and Recordkeeping Requirements: The inspection and maintenance plan must be prepared within six (6) months of the issuance date of this permit and reviewed at least once every twelve (12) months and updated as needed. Inspection and maintenance activity records and corrective actions performed on the veneer dryers in EU-3 must be recorded on inspection and maintenance logs. [LRAPA 32-007(1)(b)]

**Emissions Unit EU-4 (Mill Equipment) Specific Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	
				Method	Condition Number
32-010(3)	48	Visible Emissions	20% Opacity, 3-minute aggregate in 60 minutes	Periodic VE Observations	49
32-015(2)(b)(A)	50	PM	0.10 gr/dscf	I&M, Recordkeeping	51

- 48. Applicable Requirement: The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from any emission point in EU-4 that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(3)]
- 49. Monitoring and Recordkeeping Requirement: The permittee must monitor visible emissions into the atmosphere from emissions unit EU-4 in accordance with the following procedures, test methods, and frequencies: [LRAPA 35-0120 and OAR 340-218-0050(3)]
  - 49.a. Modified EPA Method 9 must be used to determine opacity. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
  - 49.b. Visible emissions testing, using Modified EPA Method 9, may be waived for emission unit EU-4 provided both of the following conditions are met:
    - 49.b.i. The permittee conducts a six (6) minute visible emissions survey of each point in the emissions unit, using EPA Method 22; and
    - 49.b.ii. Visible emissions from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
  - 49.c. The permittee must use the following monitoring schedule for conducting the visible emissions survey required by Condition 49:

- 49.c.i. The monitoring frequency for performing the visible emissions survey must be at least monthly.
- 49.c.ii. If an exceedance of the of the opacity limit occurs for an emission point in EU-4, the frequency of visible emissions surveys for that emission point must be increased to weekly. If six (6) consecutive weeks of emissions surveys show that opacity is less than the 20% limit, then visible emissions survey frequency may revert to a monthly schedule.
- 49.d. If visible emissions are observed from any emissions point in EU-4 during the visible emissions survey, the permittee must immediately initiate corrective action to return the device or activity to its normal operating status such that no visible emissions are present. The permittee must maintain records of all visible emissions incidents and corrective actions taken, if applicable. Any observed exceedance of the opacity standard in Condition 48 must comply with the excess emissions reporting requirements of Condition 75.
- 49.e. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.
- 49.f. If the observer is unable to conduct the visible emissions survey due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the visible emissions surveys at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
- 50. Applicable Requirement: The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot, from the point sources (i.e., non-fugitive) within emissions unit EU-4. [LRAPA 32-015(2)(b)(A)]
- 51. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Condition 50 by performing the compliance monitoring required by Condition 49. Once per quarter, the permittee must visually inspect the cyclone and baghouses, along with their associated duct work, for structural integrity, corrosion, and air leaks. The permittee must maintain a record of the inspections and any corrective action taken, if applicable. [LRAPA 35-0120 and OAR 340-218-0050(3)]

**Emissions Unit EU-5 (Fugitive Sources) Specific Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	
				Method	Condition Number
48-015(1)	52	Fugitive Emissions	Minimize	Periodic VE Observations	53

- 52. Applicable Requirement: The permittee must take reasonable precautions to prevent particulate matter from becoming airborne. [LRAPA 48-015(1)]
- 53. Monitoring and Recordkeeping Requirement: The permittee must demonstrate compliance with Condition 52 by performing the compliance monitoring required by Conditions 5 and 6. [LRAPA 35-0120 and OAR 340-218-0050(3)]

**Categorically Insignificant Activity (CIA-Emergency Generator) Specific Emission Limits and Standards**

40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines [LRAPA 44-150(5)(ffff)]

54. Applicable Requirement: Work Practice Requirements – The permittee must comply with the following requirements as stated in 40 CFR 63 Subpart ZZZZ – Table 2d: [40 CFR 63.6603(a), 40 CFR 63 Subpart ZZZZ - Table 2d]
- 54.a. Change oil and filter every 500 hours of operation or annually, whichever comes first, or utilize an oil analysis program pursuant to Condition 55 to extend the specified oil change requirement;
  - 54.b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - 54.c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
55. Applicable Requirement: The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 54. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 54. The analysis program must at a minimum analyze the following three (3) parameters: Total Base Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: [40 CFR 63.6625(i)]
- 55.a. Total Base Number is less than 30 percent of the Total Base Number of the oil when new;
  - 55.b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
  - 55.c. Percent water content (by volume) is greater than 0.5.
- If all of the condemning limits in Conditions 55.a through 55.c are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63.6625(i)]
56. Applicable Requirement: If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Conditions 54.a through 54.c, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. The permittee must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [40 CFR 63.6603(a), 40 CFR 63 Subpart ZZZZ - Table 2d]
57. Applicable Requirement: During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)]
58. Monitoring Requirement: The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent

with good air pollution control practice 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 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 63.6605(b)]

59. Monitoring Requirement: The permittee must operate the emergency stationary RICE according to the requirements in Conditions 59.a through 59.b. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation and maintenance and testing, as described in Conditions 59.a through 59.b, is prohibited. If the permittee does not operate the engine according to the requirements in Conditions 59.a through 59.b, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]
- 59.a. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.440(f)(1)]
- 59.b. The permittee may operate the emergency stationary RICE for any combination of the purposes specified in Condition 59.b.i for a maximum of 100 hours per calendar year. [40 CFR 63.6640(f)(2)]
- 59.b.i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition LRAPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR 63.6640(f)(2)(i)]
60. Recordkeeping Requirement: The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to their own maintenance plan. [40 CFR 63.6655(e)]
61. Recordkeeping Requirement: The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR 63.6655(f)]
62. Recordkeeping Requirements: The permittee must keep records in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). [40 CFR 63.6660]



### Insignificant Activities Specific Emission Limits and Standards

63. LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in LRAPA title 12 exist at facilities required to obtain an LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the applicable requirements that could apply to IEUs are incorporated as follows:
- 63.a. LRAPA 32-010(3) (20% opacity);
  - 63.b. LRAPA 32-030(1)(a) (0.10 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning equipment);
  - 63.c. LRAPA 32-015(2) (0.10 gr/dscf for non-fugitive, non-fuel burning equipment);
  - 63.d. LRAPA 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment).
64. 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 LRAPA title 12 and perform the testing in accordance with the ODEQ Source Sampling Manual.

**PLANT SITE EMISSION LIMITS**

65. The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040, 42-0041 and 42-0060]

**Annual (12-month rolling) PSELS (tons)**

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)	Emission Reduction Credits (tons/yr)
PM	176	0	0
PM <sub>10</sub>	124	0	0
PM <sub>2.5</sub>	74	0	0
CO	125	0	0
NO <sub>x</sub>	90	0	0
SO <sub>2</sub>	39	0	0
VOC	54	50	0
Single HAP	9	0	0
Total HAP	24	0	0
GHG	130,000	0	0

65.a. The permittee may only use unassigned emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by LRAPA.

65.b. Compliance with the GHG PSEL is determined through the reporting required by Condition 74, as applicable.

66. Monitoring Requirement: The permittee must determine compliance with the PSELS using the following monitoring and calculation procedures: [LRAPA 35-0120, 42-0080 and OAR 340-218-0050(3)(a)]

66.a. The permittee must monitor and maintain records of the following process parameters:

**Recordkeeping of Process Parameters**

Emissions Unit(s)	Process Parameter	Pollutant(s)	Measurement Technique	Measurement Frequency
Boiler	Steam Production: 1000 pounds (Mlb)	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , VOC and HAPs	Recordkeeping	Monthly
Plywood Presses	Plywood Production: 1000 square feet (Msf) - 3/8" basis	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, and HAPs	Recordkeeping, Production Records	Monthly
Veneer Dryers	Veneer Dried: 1000 square feet (Msf) - 3/8" basis RTO Operation: Hours	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, CO, NO <sub>x</sub> , and HAPs	Recordkeeping	Monthly

66.b. The permittee must determine compliance with the PSELs by calculating 12-month rolling emissions for each emissions units for all pollutants except GHGs by the end of the following month using the following formula and process parameters listed in Condition 66.a, and the emission factors listed in Condition 67:

$$E = \sum_{i=1}^{12} [ P_{eu_i} \times EF_{eu} \times K ]$$

- where:
- E = pollutant emissions in tons/yr.
  - $\sum_{i=1}^{12}$  = symbol representing “summation of” with limits defined from current calendar month  $i=1$  to preceding twelve months at  $i=12$ .
  - $P_{eu_i}$  = process parameter identified in Condition 66.a for calendar month  $i$ .
  - $EF_{eu}$  = emission factor identified for each emissions unit and pollutant in Condition 67.
  - K = conversion constant is 1 ton/2000 lbs for annual emissions calculations.

66.b.i. **By the 15<sup>th</sup> of each month**, the permittee must demonstrate compliance with the PSELs by utilizing the equation in Condition 66.b.

66.b.ii. The permittee must add one (1) ton of emissions to the 12-month rolling PSEL calculation for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, and VOC to account for aggregate insignificant emissions.

67. The permittee must use the emission factors in the table below in the equation in Condition 66.b for calculating the 12-month rolling emissions to demonstrate compliance with the PSELs.

**Emission Factors**

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
					Yes/No	Test Method
Boilers (EU-1)	PM	Hogged fuel	0.491 (Boiler 1) 0.471 (Boiler 2)	lb/Mlb steam	Yes	ODEQ Method 5
	PM <sub>10</sub>	Hogged fuel	0.467 (Boiler 1) 0.447 (Boiler 2)	lb/Mlb steam	No	NA
	PM <sub>2.5</sub>	Hogged fuel	0.280 (Boiler 1) 0.268 (Boiler 2)	lb/Mlb steam	No	NA
	CO	Hogged fuel	0.376 (Boiler 1) 0.225 (Boiler 2)	lb/Mlb steam	Yes	EPA Method 10
	NO <sub>x</sub>	Hogged fuel	0.198 (Boiler 1) 0.266 (Boiler 2)	lb/Mlb steam	Yes	EPA Method 7E
	SO <sub>2</sub>	Hogged fuel	0.014	lb/Mlb steam	No	NA
	VOC	Hogged fuel	1.50E-03 (Boiler 1) 9.30E-03 (Boiler 2)	lb/Mlb steam	No	NA
	Methanol <sup>(1)</sup>	Hogged fuel	9.92E-04	lb/Mlb steam	No	NA
	Total HAP	Hogged fuel	1.07E-02	lb/Mlb steam	No	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
					Yes/No	Test Method
Plywood Presses (EU-2)	PM	NA	0.203	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
	PM <sub>10</sub>	NA	0.173	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
	PM <sub>2.5</sub>	NA	0.086	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
	VOC	NA	0.252	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
	Methanol <sup>(1&amp;2)</sup>	NA	0.106	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
	Total HAP <sup>(3)</sup>	NA	0.133	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
Veneer Dryers with RTO (EU-3)	PM	Douglas Fir	0.015	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
	PM <sub>10</sub>	Douglas Fir	0.015	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
	PM <sub>2.5</sub>	Douglas Fir	0.015	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
	PM/PM <sub>10</sub> /PM <sub>2.5</sub> (Fugitives)	Douglas Fir	7.50E-04 (PM/PM <sub>10</sub> ) 3.75E-04 (PM <sub>2.5</sub> )	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
	CO	Natural Gas (RTO)	0.749	lb/hr	No	NA
	NO <sub>x</sub>	Natural Gas (RTO)	0.234	lb/hr	No	NA
	VOC	Douglas Fir	0.028 (Heated Zone) 0.0286 (Cooling Sections) 0.0026 (Fugitives)	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
	Methanol <sup>(1)</sup>	Douglas Fir	6.56E-03	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
	Total HAP	Douglas Fir	3.38E-02	lb/Msf- $\frac{3}{8}$ " veneer	No	NA
Mill Equipment (EU-4)	PM	NA	0.05	lb/MSF- $\frac{3}{8}$ " plywood	No	NA
	PM <sub>10</sub>	NA	0.04	lb/MSF- $\frac{3}{8}$ " plywood	No	NA
	PM <sub>2.5</sub>	NA	0.025	lb/MSF- $\frac{3}{8}$ " plywood	No	NA
	VOC	NA	0.27	lb/MSF- $\frac{3}{8}$ " plywood	No	NA
Mill Fugitives (EU-5)	VOC	NA	0.08	lb/Msf- $\frac{3}{8}$ " plywood	No	NA
	PM	Fixed yearly emissions	2.10	ton/year	No	NA
	PM <sub>10</sub>	Fixed yearly emissions	1.05	ton/year	No	NA
	PM <sub>2.5</sub>	Fixed yearly emissions	1.05	ton/year	No	NA

<sup>(1)</sup>NOTE: The only individual HAP near the 9 ton per year limit is Methanol. Other individual HAPs are less than 50% of the limit. Detailed HAP emission calculations are shown in Appendix C to the Review Report.

<sup>(2)</sup>NOTE: Includes methanol emissions from wood residual handling and block conditioning.

<sup>(3)</sup>NOTE: Includes HAP emissions from wood residual handling, block conditioning, and resin and glue handling.

- 67.a. Monitoring Requirement – Synthetic Minor HAP: To ensure compliance with the synthetic minor HAP limits in Condition 65, the emissions of Methanol (Single HAP) and Total HAP must be calculated in accordance with Condition 66.b for each rolling 12-month period.
- 67.b. The permittee must conduct emission factor verification tests in accordance with the ODEQ Source Sampling Manual and the testing requirements specified in Condition 68 for the emission units identified in Condition 67 as follows:
- 67.b.i. The testing required for the boilers in emissions unit EU-1 must be conducted within one (1) year prior to the expiration date of this permit.
- 67.b.ii. The permittee must notify LRAPA at least 30 days prior to conducting any emission factor verification tests by submitting a source test plan in accordance with the ODEQ Source Sampling Manual.
- 67.b.iii. The permittee must submit a source test report for emission factor verification tests to LRAPA within 60 days of any test. The source test report must include the following information: emission unit and monitoring point identification; emission results in pounds per hour and emission factor units; process parameters during the test (e.g., material throughput, steam production, etc.); and control device operating parameters.
- 67.b.iv. The emissions factors listed in Condition 67 are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs must only be determined by the calculations contained in Condition 66.b of this permit using the monitored parameters recorded during the reporting period required by Condition 66.a and the emission factors contained in Condition 67.

#### GENERAL TESTING REQUIREMENTS

68. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the ODEQ Source Sampling Manual. [LRAPA 35-0120(3) and OAR 340-218-0050(3)(a)]
- 68.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 ODEQ 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.
- 68.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.
- 68.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
- 68.c.i. At least 90% of the maximum design capacity for initial performance tests on new or modified equipment; or
- 68.c.ii. At least 90% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as no less than 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. Average hourly operating rates can be determined by taking daily operating data and dividing by the number of

hours of operation.

- 68.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.
- 68.e. Source test reports prepared in accordance with the ODEQ Source Sampling Manual must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

## **GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS**

### **69. Monitoring Requirements:**

- 69.a. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
- 69.b. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
- 69.c. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

### **70. Recordkeeping Requirements:**

- 70.a. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]
  - 70.a.i. the date, place as defined in the permit, and time of sampling or measurements;
  - 70.a.ii. the date(s) analyses were performed;
  - 70.a.iii. the company or entity that performed the analyses;
  - 70.a.iv. the analytical techniques or methods used;
  - 70.a.v. the results of such analyses;
  - 70.a.vi. the operating conditions as existing at the time of sampling or measurement; and
  - 70.a.vii. the records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
- 70.b. 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 due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [LRAPA 34-016, OAR 340-214-0114 and OAR 340-218-0050(3)(b)]
- 70.c. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]

- 70.d. Unless otherwise specified, 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 must also be retained for five (5) years. [LRAPA 34-016 and OAR 340-218-0050(b)(B)]

## REPORTING REQUIREMENTS

71. The permittee must submit three (3) copies of reports of any required monitoring at least every six (6) months, completed on forms approved by LRAPA. Six-month periods are January 1 to June 30, and July 1 to December 31. Two copies of the report must be submitted to LRAPA and one copy to the EPA. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and OAR 340-218-0080(6)(d)]
- 71.a. The first semi-annual report must be received *by August 15* and must include the semi-annual compliance certification. [OAR 340-218-0080]
- 71.b. The annual report must be received *by February 15* and must consist of the following:
- 71.b.i. The emission fee report; [OAR 340-220-0100]
  - 71.b.ii. The excess emissions upset log; [LRAPA 36-025]
  - 71.b.iii. The second semi-annual compliance certification; [OAR 340-218-0080]
  - 71.b.iv. The annual certification that the risk management plan is being properly implemented or confirmation that the risk management plan requirements have not been triggered; [OAR 340-218-0080(7)]
  - 71.b.v. The parameters and calculations required by Condition 66; and
  - 71.b.vi. Boiler NESHAP compliance report as required by Condition 31.
72. 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 340-218-0080(6)(c)]
- 72.a. The identification of each term or condition of the permit that is the basis of the certification;
- 72.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). 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;
- 72.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 72.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;

- 72.d. Such other facts as LRAPA may require to determine the compliance status of the source; and
- 72.e. Number of CAM excursions and corrective action.
73. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-00500(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)].
74. Greenhouse Gas Reporting: If the calendar year emission rate of greenhouse gases (CO<sub>2</sub>e) is greater than or equal to 2,756 tons (2,500 metric tons including both biogenic and anthropogenic), the permittee must register and report its greenhouse gas emissions with LRAPA *by March 31* of each year in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(1). [OAR 340-215-0040 and OAR 340-215-0046(1)(a)]
75. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [LRAPA 36-010, 36-025(1) and OAR 340-218-0050(3)(c)]
- 75.a. Immediately (within one (1) hour after the permittee knew or should have known of an excess emission period) the permittee must notify LRAPA by telephone, email, facsimile, or in person of any excess emission; and
- 75.b. Within 15 days of the excess emissions event, the permittee must submit a written report that contains the following information: [LRAPA 36-025(1)]
- 75.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;
- 75.b.ii. The date and time the owner or operator notified LRAPA of the event;
- 75.b.iii. The equipment involved;
- 75.b.iv. Whether the event occurred during startup, shutdown, maintenance, or as a result of a breakdown, malfunction, or emergency;
- 75.b.v. Steps taken to mitigate emissions and corrective actions taken;
- 75.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 a best estimate, supported by operating data and calculations;
- 75.b.vii. The final resolution of the cause of the excess emissions; and
- 75.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to an emergency pursuant to LRAPA 36-040.
- 75.c. 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.
- 75.d. 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.



- 75.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events only 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 75.a.
- 75.f. The permittee must continue to maintain a log of all excess emissions in accordance with LRAPA 36-025(3). 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. [OAR 340-218-0050(3)(c)]
76. Permit Deviations 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 title 36 must be reported in accordance with Condition 75. [OAR 340-218-0050(3)(c)(B)]
77. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
78. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
79. Reports must be sent to the following regulatory agency addresses, unless otherwise instructed:

Lane Regional Air Protection Agency  
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

#### NON-APPLICABLE REQUIREMENTS

80. The following Local, State and Federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110]

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	These standards do not apply because the boilers in EU-1 were installed at the facility prior to the rule-specified applicability date of June 9, 1989.
40 CFR Part 63, Subpart DDDD	Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products	The permittee obtained synthetic minor HAP restrictions prior to the compliance date.

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	The permittee obtained synthetic minor HAP restrictions prior to the compliance date.

KE/CMW  
7/22/2022

## 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.

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. Certification [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. Outdoor Burning [LRAPA Title 47]

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

G9. Asbestos [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. Stratospheric Ozone and Climate Protection [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
  - 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.

- 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. Construction/Operation Modification [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]

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. Severability Clause [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).

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.

ALL INQUIRIES SHOULD BE DIRECTED TO:

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