

# LANE REGIONAL AIR PROTECTION AGENCY TITLE V OPERATING PERMIT

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

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

ISSUED TO:	IN	FORMATION RELIED UPON:
Seneca Sawmill Company, LLC P.O. Box 851 Eugene, Oregon 97440		plication: 69807, 70456 ceived: 09/13/2023, 01/15/2024
PLANT SITE LOCATION:	LA	ND USE COMPATIBILITY STATEMENT:
90201 Highway 99N Eugene, Oregon 97402		om: City of Eugene ted: January 22, 2001
ISSUED BY THE LANE REGIONAL AIR PR	OTECTION AGENC	Y
Travis Knudsen, Executive Director		8/1/2024 Effective Date
Nature of Business:	SIC	NAICS
Sawmill/Planing Mill	2421	321113
RESPONSIBLE OFFICIAL:	FACILITY	CONTACT PERSON:
Title: Manager	Name: Title:	Courtney Griesel Oregon Community Relations Manager

(541) 762-3009

Phone:

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029

Permit Number: 207459
Page 2 of 50

# TABLE OF CONTENTS

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT	4
DEFINITIONS	5
PERMITTED ACTIVITIES	6
EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION	6
GENERAL EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING	G
REQUIREMENTS	
Facility-Wide Requirements	
Fugitive Emissions.	7
Nuisance Conditions	8
Accidental Release Prevention	9
SIGNIFICANT EMISSION UNIT EMISSION LIMITS AND STANDARDS	9
Emission Unit MH	9
Emission Units K1 through K12	11
National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products – 4	
CFR 63 subpart DDDD (4D)	
Emission Units Boiler-3, Boiler-4 and Boiler-5	13
Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units – 40 C	CFR
60 subpart Dc	14
National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, a	and
Institutional Boilers and Process Heaters – 40 CFR 63 subpart DDDDD (5D)	14
Emission Unit GDF	20
Emission Unit MG	
GENERAL INSIGNIFICANT ACTIVITY REQUIREMENTS	24
SPECIFIC INSIGNIFICANT ACTIVITY REQUIREMENTS	25
Aggregate Insignificant Activity – Emission Unit AIA-1 (Plasma Table with Torch)	25
Aggregate Insignificant Activity – Emission Unit AIA-2 (Paint Booth)	25
Aggregate Insignificant Activity – Emission Unit AIA-3 (Welding and Fabrication)	
Categorically Insignificant Activity – Diesel-Fired 150 kW Emergency Generator (CIA-1)	26
National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combu	ıstion
Engines – 40 CFR 63 subpart ZZZZ	
New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines -	- 40
CFR 60 subpart IIII	
CLEANER AIR OREGON	
Cleaner Air Oregon Source Risk Limits	29
Cleaner Air Oregon General Conditions and Disclaimers	
PLANT SITE EMISSION LIMITS	
Plant Site Emission Limit Monitoring	32
GENERAL TESTING REQUIREMENTS	34
GENERAL RECORDKEEPING REQUIREMENTS	
REPORTING REQUIREMENTS	
General Reporting Requirements	
Specific Reporting Requirements	
NON-APPLICABLE REQUIREMENTS	
GENERAL CONDITIONS	
ATTACHMENT A: AIR POLITITION EMERGENCIES	45

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029

Permit Number: 207459
Page 3 of 50

# TABLE OF TABLES

Existing Emission Unit and Pollution Control Device Identification	6
New and Modified Emission Unit and Pollution Control Device Identification	7
Facility-Wide Emission Limits and Standards	7
Emission Unit MH Emission Limits and Standards	9
Emission Units K1 through K12 Emission Limits and Standards	11
Emission Units Boiler-3 through Boiler-5 Emission Limits and Standards	13
Emission Unit GDF Emission Limits and Standards	20
Emission Unit MG Emission Limits and Standards	23
Plant Site Emission Limits	31
Process Parameter Monitoring.	32
Emission Factors Used For Calculating Emissions	33

Seneca Sawmill Company, LLC Expiration Date: August 1, 2029 Permit Number: 207459 Page 4 of 50

# LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029

Permit Number: 207459
Page 5 of 50

# **DEFINITIONS**

None

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 6 of 50

#### PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010, 340-218-0120]

- 2. In accordance with OAR 340-218-0010, LRAPA is authorized to implement all Oregon Administrative Rules, divisions 218 and 220 which apply to sources subject to the Oregon rules as they pertain to Oregon Title V Operating Permit Program sources until such time as LRAPA adopts its own Title V Permit Program rules. [LRAPA 34-180]
- 3. All conditions in this permit are federally enforceable except as noted below:
  - 3.a. Conditions 9, 10, 57 through 72, 100 through 112, 131, and General Conditions G5 and part of G9 (LRAPA title 43) are only enforceable by LRAPA. [OAR 340-218-0060]

#### EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

4. The emissions units regulated by this permit before the modification authorized under the Standard ACDP are the following: [OAR 340-218-0040(3)]

**Existing Emission Unit and Pollution Control Device Identification** 

Emission Unit ID	Emission Unit Description	Pollution Control Device Description (PCD ID)	Installed / Last Modified
Significant I	Emission Units		
		Main Baghouse (EP-01) Mill A Planer Baghouse No. 1 (EP-02A)	<2015 <2015
		Stud Mill Sawdust Baghouse (EP-05)	<2015
MH	Sawmill/Planing Mill Activities	Stud Mill Planer Shaving Baghouse (EP-06)	<2015
		Mill A Sawdust Baghouse (EP-08)	<2015
		One (1) Target Box with Filter (EP-11)	<2015
K1	Dimensional Dry Kiln	None	>2015
K2	Dimensional Dry Kiln	None	>2015
K3	Dimensional Dry Kiln	None	>2015
K4	Dimensional Dry Kiln	None	>2015
K5	Stud Dry Kiln (S1)	None	2011
K6	Stud Dry Kiln (S2)	None	2012
K7	Stud Dry Kiln (S3)	None	2014
K8	Stud Dry Kiln	None	>2015
Boiler-3	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	2016
Boiler-4	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	TBI
Boiler-5	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	TBI
GDF	Gasoline Dispensing Facility	None	1980's
Categoricall	y Insignificant Activities		
CIA-1	Diesel-Fired 150 kW Emergency Generator	None	2016

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 7 of 50

**Existing Emission Unit and Pollution Control Device Identification** 

Emission Unit ID	<b>Emission Unit Description</b>	Pollution Control Device Description (PCD ID)	Installed / Last Modified
CIA-2	Diesel Storage Tanks	None	1980's

5. The new and modified emissions units regulated by this permit after the modification authorized under the Standard ACDP are the following: [OAR 340-218-0040(3)]:

#### New and Modified Emission Unit and Pollution Control Device Identification

Emission Unit ID	Emission Unit Description Pollution Control Device Description (PCD ID)		Installed / Last Modified			
Significant I	Significant Emission Units					
		Main Baghouse (EP-01)	<2015			
		Dimensional Planer Baghouse No. 1 (EP-02)	<2015			
MH	Sawmill/Planing Mill Activities	Stud Mill Planer Baghouse No. 1 (EP-05)	TBI			
IVITI		Stud Mill Planer Baghouse No. 2 (EP-06)	TBI			
		Planer Trim Saw Sawdust Baghouse (EP-08)	TBI			
		One (1) Target Box with Filter (EP-11)	TBI			
K5-K12	Eight (8) Stud Dry Kilns	None	TBI			
MG	Mill Grinding	Mill Grinding Cyclone and Baghouse (EP-013)	TBI			
Aggregate In	nsignificant Activities					
AIA-1	Plasma Table with Torch	Semi-dry Plasma Table	TBI			
AIA-2	Paint Booth	Dry filters	TBI			
AIA-3	Welding and Fabrication None		TBI			
Categoricall	Categorically Insignificant Activities					
CIA-2	Diesel Storage Tanks	None	None			

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

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

# **Facility-Wide Requirements**

**Facility-Wide Emission Limits and Standards** 

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Method	Monitoring Condition
48-015	6	Fugitive Emissions	Minimize	Recordkeeping	7, 8
49-010(1)	9	Nuisance	Prohibited	Recordkeeping	12
32-055	10	PM >250 microns	No Fallout	Recordkeeping	12
32-090(1)	11	Nuisance	Prohibited	Recordkeeping	12
40 CFR part 68	13	Risk Management	Risk Management Plan	Recordkeeping	13

## **Fugitive Emissions**

6. <u>Applicable Requirement</u>: The permittee must not allow any materials to be handled, transported, or stored; or a building, its appurtenances; or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but not be limited to the following: [LRAPA 48-015(1)]

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 8 of 50

6.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

- 6.b. Application of water, or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
- 6.c. Full or partial enclosure of materials stockpiles in cases where application of water, or other suitable chemicals is not sufficient to prevent particulate matter from becoming airborne;
- 6.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
- 6.e. Adequate containment during sandblasting or other similar operations;
- 6.f. The covering of moving open bodied trucks transporting materials likely to become airborne; and
- 6.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
- 7. Monitoring Requirement: The permittee must demonstrate compliance with Condition 6 by conducting a fugitive emissions survey. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the facility using EPA Method 22 for any sources of fugitive emissions. For purposes of this condition, fugitive emissions are visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period. The person conducting EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions: [LRAPA 34-016(1), LRAPA 48-015(2)&(3), and OAR 340-218-0050(3)(a)]
  - 7.a. If sources of fugitive emissions are identified that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period, the permittee must immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 6. After taking corrective action, the permittee must conduct another fugitive emissions survey using EPA Method 22 within 24 hours of the previous fugitive emissions survey.
  - 7.b. If the fugitive emissions survey performed within 24 hours of the previous fugitive emissions survey detects visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period, the permittee must immediately notify LRAPA. LRAPA may require the facility to develop and implement a Fugitive Emission Control Plan to prevent any visible emissions from leaving the plant site boundary.
- 8. Recordkeeping Requirement: The permittee must record the following information in a monitoring log pertaining to Condition 7 for all fugitive emission surveys: date, time, person or entity conducting the survey, any excess fugitive emissions observed, and any corrective actions taken. [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]

#### **Nuisance Conditions**

- 9. <u>Applicable Requirement</u>: The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)] This condition is only enforceable by LRAPA.
- 10. <u>Applicable Requirement</u>: The permittee must not cause or permit the emission of any particulate matter which is greater than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is enforceable only by LRAPA.
- 11. <u>Applicable Requirement</u>: The permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property. Such determination is to be made by LRAPA. [LRAPA 32-090(1)]
- 12. <u>Monitoring and Recordkeeping Requirement</u>: To demonstrate compliance with Conditions 9 through 11, the

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 9 of 50

permittee must maintain a log of all complaints received by the responsible official or designated employees (written, received via telephone or facsimile). The log must also record permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the problem within two (2) working days of receiving the complaint or within such longer time as is reasonably necessary, not to exceed five (5) working days. If more than five (5) days are needed to resolve the problem, the permittee must notify LRAPA immediately upon making that determination. [OAR 340-218-0050(3)(a), and OAR 340-218-0050(3)(b)]

#### **Accidental Release Prevention**

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

#### SIGNIFICANT EMISSION UNIT EMISSION LIMITS AND STANDARDS

#### **Emission Unit MH**

#### **Emission Unit MH Emission Limits and Standards**

Emission emi illi Emission Emission avantati as					
Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
32-010(2)&(3)	14	Visible Emissions	20% opacity, 6 minute avg.	VE Survey	15
32-015(2)(b)(B)	17	PM	0.10 gr/dscf	Parametric, O&M	23, 24
32-015(2)(c)	18	PM	0.14 gr/dscf	Parametric, O&M	23, 24
32-045(1)	19	PM	Process Weight Rate Limit	Parametric, O&M	23, 24
37-0066(3)(c)(A) 32-009(1)	20-22	PM <sub>2.5</sub>	Short Term NAAQS	Parametric, O&M	23, 24

- 14. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Unit MH that equal or exceed an average of 20 percent opacity. When visual determination of opacity is required, the opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(2)&(3)]
- 15. Monitoring Requirement: The permittee must demonstrate compliance with the opacity limit in Condition 14 by performing a visible emissions survey of the plant. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the plant using EPA Method 22 for any sources of visible emissions. For the purposes of this condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-016(1)]
  - 15.a. If visible emissions are observed using EPA Method 22, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 within 24 hours of the previous visible emissions survey.
  - 15.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey detects visible emissions from the same source(s), the permittee is required to immediately contact

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 10 of 50

LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance with Condition 14, no further action is required beyond the recordkeeping required in Condition 16 If the results of EPA Method 9 are not in compliance with Condition 14, the permittee must immediately contact LRAPA.

- 16. <u>Recordkeeping Requirement</u>: The permittee must keep documentation of all visible emissions surveys required by Condition 15. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]
- 17. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 in excess of 0.14 grains per dry standard cubic foot if there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
- 18. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified after April 16, 2015 in excess of 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(c)]
- 19. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 20. <u>Applicable Requirement</u>: The PM<sub>2.5</sub> emissions from Emission Point EP05 from Emission Unit MH may not exceed 0.027 pounds per hour. [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
- 21. <u>Applicable Requirement</u>: The PM<sub>2.5</sub> emissions from Emission Point EP06 from Emission Unit MH may not exceed 0.027 pounds per hour. [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
- 22. <u>Applicable Requirement</u>: The PM<sub>2.5</sub> emissions from Emission Point EP08 from Emission Unit MH may not exceed 0.022 pounds per hour. [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
- 23. Monitoring and Recordkeeping Requirement: To demonstrate compliance with Conditions 17 through 22, the permittee must exhaust the particulate matter emissions from Emissions Unit MH to a baghouse(s) and/or a target box whenever this process is operating. The permittee must operate, maintain and calibrate monitoring devices for measuring the pressure drop across each baghouse used to control emissions from these processes. The permittee must maintain the pressure drop across each baghouse between 0.5 and 5 inches of water column whenever Emission Unit MH is operating. The permittee may establish alternate operating parameter ranges or values with the approval of LRAPA using the procedures under OAR-340-218. The permittee must measure and record the pressure drop across each baghouse at least once per week while Emission Unit MH is operating. [LRAPA 32-005(1), 32-007(1)(b) and 34-016(1)]
  - 23.a. If the pressure drop across a baghouse exceeds the operating parameter range listed in Condition 23, the permittee must complete a daily visual emissions survey for that baghouse according to Conditions 15 and 16 for each day that baghouse is operating, take corrective action to return the baghouse to the operating parameter range listed in Condition 23, and document the corrective actions. The permittee may cease conducting a daily visual emissions survey once the baghouse is operating within the operating parameter range listed in Condition 23.
  - 23.b. If the permittee is unable to conduct the daily visual emissions survey on a particular day due to visual interferences caused by other visible emissions sources (e.g., wildfires) or due to weather conditions such as fog, heavy rain, or snow, the permittee must note such conditions on the monitoring log and make at least three (3) attempts to conduct the visual emissions survey at approximately 2-hour intervals throughout the day.
  - 23.c. Operating the baghouse when the pressure drop exceeds the operating parameter range listed in Condition 23 is not considered a violation of an emission limit. However, failure to take corrective action will be considered a violation of this permit.

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 11 of 50

24. Recordkeeping Requirement: Operation and Maintenance Plan (O&M Plan) – To demonstrate compliance with Conditions 17 through 22, the permittee must prepare and update, as needed, an O&M Plan for any air pollution control equipment associated with Emissions Units MH. The permittee must submit a copy of the O&M Plan to LRAPA for review upon request. If LRAPA determines the O&M Plan is deficient, LRAPA may require the permittee to amend the plan. At a minimum, the O&M Plan must include inspection schedules for all particulate matter control systems, including but not limited to baghouses and target boxes. The O&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary. [LRAPA 32-007(1)(b) and 34-016(1)]

#### Emission Units K1 through K12

Emission Units K1 through K12 Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
32-010(2)&(3)	14	Visible Emissions	20% opacity, 6 minute avg.	VE Survey	26
32-015(2)(b)(B)	28	PM	0.10 gr/dscf	VE Survey	31
32-015(2)(c)	29	PM	0.14 gr/dscf	VE Survey	31
32-045(1)	30	PM	Process Weight Rate Limit	VE Survey	31
37-0066(3)(c)(A) 32-009(1)	32	PM <sub>2.5</sub>	Short Term NAAQS	Recordkeeping	33
32-007, 42-0080	34	НАР	200 °F (dry bulb), 3-hr avg.	Parametric	35
40 CFR part 63 subpart DDDD	NA	HAP	NA	NA	NA

- 25. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Units K1 through K12 that equal or exceed an average of 20 percent opacity. When visual determination of opacity is required, opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(2)&(3)]
- 26. Monitoring Requirement: The permittee must demonstrate compliance with the opacity limit in Condition 25 by performing a visible emissions survey of the plant. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the plant using EPA Method 22 for any sources of visible emissions. For the purposes of this condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-016(1)]
  - 26.a. If visible emissions are observed using EPA Method 22, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 within 24 hours of the previous visible emissions survey.
  - 26.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey detects visible emissions from the same source(s), the permittee is required to immediately contact LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance with Condition 25, no further action is required beyond the recordkeeping required in Condition 27 If the results of EPA Method 9 are not in compliance with Condition 25, the permittee must immediately contact LRAPA.

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 12 of 50

27. <u>Recordkeeping Requirement</u>: The permittee must keep documentation of all visible emissions surveys required by Condition 26. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]

- 28. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 in excess of 0.14 grains per dry standard cubic foot if there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
- 29. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified after April 16, 2015 in excess of 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(c)]
- 30. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 31. <u>Monitoring Requirement</u>: To demonstrate compliance with Conditions 28 through 30 for Emission Units K1 through K12, the permittee must demonstrate compliance with Conditions 25 through 27.
- 32. <u>Applicable Requirement</u>: The PM<sub>2.5</sub> emissions from each Emission Unit K5 through K8 after modification and each Emission Unit K9 through K12 may not exceed 2.14 pounds per hour. [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
- 33. <u>Monitoring and Recordkeeping Requirement</u>: To demonstrate compliance with Conditions 32, the permittee must keep and maintain documentation of the calculation of the maximum hourly particulate matter emission rate from each emission unit K5 through K12. [LRAPA 34-016(1)]
- 34. Applicable Requirement: The permittee must operate each Emission Unit K1 through K12 such that each three (3) hour block average dry kiln operating temperature is less than or equal to 200 °F (dry bulb), whenever a dry kiln is operating and loaded with a charge. If the three (3) hour block average operating temperature exceeds 200 °F (dry bulb), the permittee must initiate corrective action to decrease the operating temperature below 200 °F (dry bulb). Exceeding a three (3) hour block average dry kiln operating temperature of 200 °F (dry bulb) is not a violation of this permit if the permittee initiates corrective action. [LRAPA 32-005(1), 32-007 and 42-0080]
- 35. <u>Monitoring and Recordkeeping Requirement</u>: The permittee must record each three (3) hour block average temperature for a dry kiln whenever the dry kiln is operating and loaded with a charge. [LRAPA 34-016(1)]
- 36. Recordkeeping Requirement: For each three (3) hour block average operating temperature that exceeds 200 °F (dry bulb), the permittee must record the corrective action taken to decrease the operating temperature below 200 °F (dry bulb). [LRAPA 34-016(1)]

National Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products – 40 CFR part 63 subpart DDDD (4D)

- 37. Reporting Requirement: The permittee that owns or operates a new major affected source for which an application for the modification of the Standard ACDP is required must provide the following information in writing to the LRAPA: [LRAPA 44-150(5)(a)&(kkk), 40 CFR 63.2252 and 40 CFR 63.9(b)(4)]
  - 37.a. A notification of intention to construct a new major-emitting affected source with the application for the modification of the Standard ACDP.
  - 37.b. A notification of the actual date of startup of the source, delivered or postmarked within 15 calendar days after that date.

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 13 of 50

38. Reporting Requirement: The permittee may use the application for the modification of the Standard ACDP to fulfill the initial notification requirements in Condition 37. [LRAPA 44-150(5)(a) and 40 CFR 63.9(b)(1)(iii)]

#### Emission Units Boiler-3, Boiler-4, and Boiler-5

Emission Units Boiler-3 through Boiler-5 Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
32-010(2)&(3)	39	Visible Emissions	20% opacity, 6-minute avg.	VE Survey	40
32-030(2) and (3)(b)	42	PM	0.10 gr/dscf @ 50% excess air	Fuel Limitation, DDDDD	43, 51-52
40 CFR part 60 subpart Dc	45	None	None	Recordkeeping	45
40 CFR part 63 subpart DDDDD	47-50	НАР	Work Practice Standards	Recordkeeping	51-52

- 39. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Units Boiler-3, Boiler-4, and Boiler-5 that equal or exceed an average of 20 percent opacity. When visual determination of opacity is required, opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(2)&(3)]
- 40. Monitoring Requirement: The permittee must demonstrate compliance with the opacity limit in Condition 39 by performing a visible emissions survey of the plant. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the plant using EPA Method 22 for any sources of visible emissions. For the purposes of this condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-016(1)]
  - 40.a. If visible emissions are observed using EPA Method 22, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 within 24 hours of the previous visible emissions survey.
  - 40.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey detects visible emissions from the same source(s), the permittee is required to immediately contact LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance with Condition 39, no further action is required beyond the recordkeeping required in Condition 41 If the results of EPA Method 9 are not in compliance with Condition 39, the permittee must immediately contact LRAPA.
- 41. <u>Recordkeeping Requirement</u>: The permittee must keep documentation of all visible emissions surveys required by Condition 39. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]
- 42. <u>Applicable Requirement</u>: For fuel burning equipment sources installed, constructed, or modified after April 16, 2015, the permittee must not cause suffer, allow, or permit particulate matter emissions from any fuel burning equipment in excess of 0.10 grains per dry standard cubic foot. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air. [LRAPA 32-030(2) and (3)(b)]

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 14 of 50

43. <u>Monitoring Requirement</u>: To demonstrate compliance with Condition 42, the permittee must comply with the applicable emission limitations, monitoring, and recordkeeping of 40 CFR part 63 subpart DDDDD under Conditions 46 through 56. [LRAPA 34-016(1)]

- 44. <u>Recordkeeping Requirement</u>: To demonstrate compliance with Condition 42, the permittee must keep documentation that demonstrate Emission Units Boiler-3, Boiler-4, or Boiler-5 are only capable of combusting natural gas. [LRAPA 32-009(4)]
  - Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units 40 CFR part 60 subpart Dc
- 45. Reporting and Recordkeeping Requirement: The permittee must record and maintain records of the amount of each fuel combusted by Emission Units Boiler-3, Boiler-4 and Boiler-5 during each calendar month. [LRAPA 46-535(3)(e) and 40 CFR 60.48c(g)(2)]
  - National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters 40 CFR part 63 subpart DDDDD (5D)
- 46. <u>Applicable Requirement</u>: Compliance deadlines for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7495]
  - 46.a. Any new or reconstructed boiler or process heater at the existing source must be in compliance with 40 CFR part 63 subpart 5D upon startup. [LRAPA 44-150(5)(jiji) and 40 CFR 63.7495(c)(1)]
  - 46.b. Any existing boiler or process heater at the existing source must be in compliance with 40 CFR part 63 subpart 5D within three (3) years after the source becomes a major source. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7495(c)(2)]
  - 46.c. The permittee must meet the notification requirements in Condition 53 according to the schedule in Condition 53 and in 40 CFR part 63 subpart A. Some of the notifications must be submitted before the facility is required to comply with the work practice standards in 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jiji) and 40 CFR 63.7495(d)]
- 47. <u>Applicable Requirement</u>: Emissions limitations, work practice standards, and operating limits for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7500]
  - 47.a. The permittee must meet the requirements in Condition 47.a.i. and ii., except as provided in Condition 47.b. The permittee must meet these requirements at all times the affected unit is operating. [LRAPA 44-150(5)(jjjj)) and 40 CFR 63.7500(a)]
    - 47.a.i. The permittee must meet each work practice standard in Table 3 to 40 CFR part 63 subpart 5D (included in this permit) that applies to each boiler, for each boiler at the source. [LRAPA 44-150(5)(jijj) and 40 CFR 63.7500(a)(1)]
    - 47.a.ii. At all times, the permittee must operate and maintain any affected source (as defined in 40 CFR 63.7490), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7500(a)(3)]
  - 47.b. Boilers and process heaters in the units designed to burn gas 1 fuels subcategory are not subject to the emission limits in Tables 1 and 2 or 11 through 13 of 40 CFR part 63 subpart 5D, or the operating limits in Table 4 of 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj)] and 40 CFR 63.7500(e)]
- 48. Applicable Requirement: General requirements for complying with 40 CFR part 63 subpart 5D. [LRAPA 44-

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 15 of 50

150(5)(jjjj) and 40 CFR 63.7505]

48.a. The permittee must be in compliance with the work practice standards in 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7505(a)]

- 49. <u>Applicable Requirement</u>: Initial compliance requirements for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj)) and 40 CFR 63.7510]
  - 49.a. For existing affected sources (as defined in 40 CFR 63.7490), the permittee must complete an initial tune-up by following the procedures described in Condition 52.a.i.A. through 52.a.i.F. no later than the compliance date specified in Condition 46. You must complete the one-time energy assessment specified in Table 3 to 40 CFR part 63 subpart 5D (included in this permit) no later than the compliance date specified in Condition 46. [LRAPA 44-150(5)(ijij) and 40 CFR 63.7510(e)]
  - 49.b. For new or reconstructed affected sources (as defined in 40 CFR 63.7490), the permittee must demonstrate initial compliance with the applicable work practice standards in Table 3 to 40 CFR part 63 subpart 5D (included in this permit) within the annual or 5-year schedule as specified in Condition 50.a. following the initial compliance date specified in Condition 46.a. Thereafter, the permittee is required to complete the applicable annual or 5-year tune-up as specified in Condition 50.a. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7510(g)]
- 50. <u>Applicable Requirement</u>: Conducting subsequent tune-ups for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jiji) and 40 CFR 63.7515]
  - 50.a. If the permittee is required to meet an applicable tune-up work practice standard, the permittee must conduct an annual or 5-year performance tune-up according to Condition 52.a.i. or Condition 52.a.ii., respectively. Each annual tune-up specified in Condition 52.a.i must be no more than 13 months after the previous tune-up. Each 5-year tune-up specified in Condition 52.a.ii must be conducted no more than 61 months after the previous tune-up. For a new or reconstructed affected source (as defined in 40 CFR 63.7490), the first annual or 5-year tune-up must be no later than 13 months or 61 months, respectively, after the initial startup of the new or reconstructed affected source, whichever is later. [LRAPA 44-150(5)(jijj) and 40 CFR 63.7515(d)]
- 51. <u>Monitoring Requirement</u>: Demonstrating initial compliance with the work practice standards for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7530]
  - 51.a. The permittee must include with the Notification of Compliance Status a signed certification that either the energy assessment was completed according to Table 3 to 40 CFR part 63 subpart 5D (included in this permit), and that the assessment is an accurate depiction of the permittee's facility at the time of the assessment, or that the maximum number of on-site technical hours specified in the definition of energy assessment applicable to the facility has been expended. [LRAPA 44-150(5)(jiji) and 40 CFR 63.7530(e)]
  - 51.b. The permittee must submit the Notification of Compliance Status containing the results of the initial compliance demonstration according to the requirements in Condition 53.c. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7530(f)]
- 52. <u>Monitoring Requirement</u>: Demonstrating continuous compliance with the work practice standards for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjjj) and 40 CFR 63.7540]
  - 52.a. The permittee must demonstrate continuous compliance with the work practice standards in Table 3 to 40 CFR part 63 subpart 5D (included in this permit), and Condition 52.a.i. [LRAPA 44-150(5)(ijii) and 40 CFR 63.7540(a)]
    - 52.a.i. The permittee must conduct an annual tune-up of the boiler or process heater to demonstrate continuous compliance as specified in Conditions 52.a.i.A through 52.a.i.F. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler or process heater over the 12 months prior to the

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 16 of 50

tune-up. This frequency does not apply to units with continuous oxygen trim systems that maintain an optimum air to fuel ratio. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)]

- 52.a.i.A. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may perform the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; [LRAPA 44-150(5)(jjjj)) and 40 CFR 63.7540(a)(10)(i)]
- 52.a.i.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, if available; [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)(ii)]
- 52.a.i.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); [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)(iii)]
- 52.a.i.D. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>X</sub> requirement to which the unit is subject; [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)(iv)]
- 52.a.i.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; and [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)(v)]
- 52.a.i.F. Maintain on-site and submit, if requested by LRAPA, a report containing the information in Conditions 52.a.i.F.1. and 52.a.i.F.2. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)(vi)]
  - 52.a.i.F.1 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 or process heater; [LRAPA 44-150(5)(jjjj)] and 40 CFR 63.7540(a)(10)(vi)(A)]
  - 52.a.i.F.2 A description of any corrective actions taken as a part of the tune-up; and [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(10)(vi)(B)]
- 52.a.ii. If the boiler or process heater has a continuous oxygen trim system that maintains an optimum air to fuel ratio, the permittee must conduct a tune-up of the boiler or process heater every five (5) years as specified in Conditions 52.a.i.A. through 52.a.i.F. to demonstrate continuous compliance. The permittee may delay the burner inspection specified in Condition 52.a.i.A. until the next scheduled or unscheduled unit shutdown, but the permittee must inspect each burner at least once every 72 months. If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every five (5) years, set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up. [LRAPA 44-150(5)(jjjj)] and 40 CFR 63.7540(a)(12)]
- 52.a.iii. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 calendar days of startup. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7540(a)(13)]
- 53. Reporting Requirement: Notifications that must be submitted for 40 CFR part 63 subpart 5D. [LRAPA 44-

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 17 of 50

# 150(5)(jjjj) and 40 CFR 63.7545]

53.a. The permittee must submit to LRAPA all of the notifications in 40 CFR 63.9(b) through (h) that apply to the permittee by the dates specified. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7545(a)]

- 53.b. As specified in 40 CFR 63.9(b)(4) and (5), if the permittee starts a new or reconstructed affected source on or after January 31, 2013, the permittee must submit an Initial Notification not later than 15 days after the actual date of startup of the affected source. [LRAPA 44-150(5)(jjjjj) and 40 CFR 63.7545(c)]
- 53.c. If the permittee is required to conduct an initial compliance demonstration as specified in Condition 51, the permittee must submit a Notification of Compliance Status according to 40 CFR 63.9(h)(2)(ii). For the initial compliance demonstration for each boiler, the permittee must submit the Notification of Compliance Status before the close of business on the 60th day following the completion of other initial compliance demonstrations for all boilers at the facility according to 40 CFR 63.10(d)(2). The Notification of Compliance Status report must contain all the information specified in Conditions 53.c.i. through 53.c.iv. The Notification of Compliance Status must only contain the information specified in Conditions 53.c.i. through 53.c.iv. and must be submitted within 60 days of the compliance date in Condition 46. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7545(e)]
  - 53.c.i. A description of the affected unit(s) including identification of which subcategories the unit is in, the design heat input capacity of the unit, a description of the add-on controls used on the unit to comply with this subpart, description of the fuel(s) burned, including whether the fuel(s) were a secondary material determined by the permittee or the EPA through a petition process to be a non-waste under 40 CFR 241.3, whether the fuel(s) were a secondary material processed from discarded non-hazardous secondary materials within the meaning of 40 CFR 241.3, and justification for the selection of fuel(s) burned during the compliance demonstration. [LRAPA 44-150(5)(jjjj)] and 40 CFR 63.7545(e)(1)]
  - 53.c.ii. A signed certification that the permittee has met all applicable work practice standards. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7545(e)(6)]
  - 53.c.iii. If the permittee had a deviation from any work practice standard, or operating limit, the permittee must also submit a description of the deviation, the duration of the deviation, and the corrective action taken in the Notification of Compliance Status report. [LRAPA 44-150(5)(ijii) and 40 CFR 63.7545(e)(7)]
  - 53.c.iv. In addition to the information required in 40 CFR 63.9(h)(2), the notification of compliance status must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7545(e)(8)]
    - 53.c.iv.A. "This permittee completed the required initial tune-up for all of the boilers and process heaters covered by 40 CFR part 63 subpart DDDDD at this site according to the procedures in Condition 52.a.i. through 53.c.iv." [LRAPA 44-150(5)(jijj) and 40 CFR 63.7545(e)(8)(i)]
    - 53.c.iv.B. "This permittee has had an energy assessment performed according to Condition 51.a." [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7545(e)(8)(ii)]
- 54. Reporting Requirement: Reports that must be submitted for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jiji) and 40 CFR 63.7550]
  - 54.a. The permittee must submit each report in Table 9 to 40 CFR part 63 subpart 5D (included in this permit) that applies to the permittee. [LRAPA 44-150(5)(jiji) and 40 CFR 63.7550(a)]
  - 54.b. The permittee must submit each report, according to Condition 54.d., by the date in Table 9 to 40 CFR part 63 subpart 5D (included in this permit) and according to the requirements in Condition 130. For units that are subject only to a requirement to conduct subsequent annual or 5-year tune-up according to Conditions 52.a.i. or 52.a.ii., and not subject to emission limits or operating limits, the permittee may submit only an annual or 5-year compliance report instead of a semi-annual compliance report. [LRAPA 44-150(5)(jjjj), 40 CFR 63.7550(b), and 40 CFR 63.10(a)]
  - 54.c. A compliance report must contain the following information depending on how the permittee

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 18 of 50

chooses to comply with the limits set in this rule. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)]

- 54.c.i. The permittee must submit a compliance report with the information in Condition 54.c.ii.A. through 54.c.ii.E. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(1)]
- 54.c.ii. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(5)]
  - 54.c.ii.A. Company and facility name and address. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(5)(i)]
  - 54.c.ii.B. Process unit information. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(5)(ii)]
  - 54.c.ii.C. Date of report and beginning and ending dates of the reporting period. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(5)(iii)]
  - 54.c.ii.D. Include the date of the most recent tune-up for each unit subject to only the requirement to conduct an annual or 5-year tune-up according to Conditions 52.a.i. or 52.a.ii. Include the date of the most recent burner inspection if it was not done annually or on a 5-year period and was delayed until the next scheduled or unscheduled unit shutdown. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(5)(xiv)]
  - 54.c.ii.E. Statement by a responsible official with that official's name, title, and signature, certifying the truth, accuracy, and completeness of the content of the report. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(c)(5)(xvii)]
- 54.d. The permittee must submit the reports according to the procedures specified Condition 54.d.i. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7550(h)]
  - 54.d.i. The permittee must submit all reports required by Table 9 to 40 CFR part 63 subpart 5D (included in this permit) electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR part 63 subpart 5D. Instead of using the electronic report in CEDRI for 40 CFR part 63 subpart 5D, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (http://www.epa.gov/ttn/chief/cedri/index.html), once the XML schema is available. If the reporting form specific to 40 CFR part 63 subpart 5D is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in 40 CFR 63.13. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. [LRAPA 44-150(5)(jijj) and 40 CFR 63.7550(h)(3)]
- 55. Recordkeeping Requirement: Records that must be kept for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj)] and 40 CFR 63.7555]
  - 55.a. The permittee must keep records according to Condition 55.a.i. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7555(a)]
    - 55.a.i. A copy of each notification and report that the permittee submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status or semiannual compliance report that the permittee submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv). [LRAPA 44-150(5)(jjjjj) and 40 CFR 63.7555(a)(1)]
- 56. Recordkeeping Requirement: In what form and how long must records be kept for 40 CFR part 63 subpart 5D. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7560]
  - 56.a. The permittee records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7560(a)]
  - 56.b. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [LRAPA 44-150(5)(jijj) and 40 CFR 63.7560(b)]
  - 56.c. The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least two (2) years after the date of each occurrence,

Seneca Sawmill Company, LLC Permit Number: 207459 Expiration Date: August 1, 2029 Page 19 of 50

> measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). The permittee can keep the records off site for the remaining three (3) years. [LRAPA 44-150(5)(jjjj) and 40 CFR 63.7560(c)]

Table 3 to 40 CFR part 63 subpart DDDDD – Work Practice Standards
As stated in Condition 47, the permittee must comply with the following applicable work practice standards

As stated in Condition 47, the permitted	e must comply with the following applicable work practice standards:		
If the permittee's unit is	The permittee must meet the following		
1. A new or existing boiler with a continuous oxygen trim system that maintains an optimum air to fuel ratio in any of the following subcategories: unit designed to burn gas 1	Conduct a tune-up of the boiler or process heater every five (5) years as specified in Condition 52.		
3. A new or existing boiler or process heater without a continuous oxygen trim system and with heat input capacity of 10 million Btu per hour or greater	Conduct a tune-up of the boiler or process heater annually as specified in Condition 52. Units in the Gas 1 subcategory will conduct this tune-up as a work practice for all regulated emissions under 40 CFR part 63 subpart 5D.		
4. An existing boiler located at a major source facility, not including limited use units	Must have a one-time energy assessment performed by a qualified energy assessor. An energy assessment completed on or after January 1, 2008, that meets or is amended to meet the energy assessment requirements in this table, satisfies the energy assessment requirement. A facility that operated under an energy management program developed according to the ENERGY STAR guidelines for energy management or compatible with ISO 50001 for at least one (1) year between January 1, 2008 and the compliance date specified in Condition 46 that includes the affected units also satisfies the energy assessment requirement. The energy assessment must include the following with extent of the evaluation for items a. to e. appropriate for the on-site technical hours listed in the definition of energy assessment in 40 CFR 63.7575:		
	a. A visual inspection of the boiler or process heater system.		
	b. An evaluation of operating characteristics of the boiler or process heater systems, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints.		
	c. An inventory of major energy use systems consuming energy from affected boilers and process heaters and which are under the control of the boiler/process heater owner/operator.		
	d. A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage.		
	e. A review of the facility's energy management program and provide recommendations for improvements consistent with the definition of energy management program, if identified.		
	f. A list of cost-effective energy conservation measures that are within the facility's control.		
	g. A list of the energy savings potential of the energy conservation measures identified.		
	h. A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.		

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 20 of 50

## Table 9 to subpart DDDDD of part 63—Reporting Requirements

As stated in Condition 54, the permittee must comply with the following requirements for reports:

		The permittee must submit the report
The permittee must submit a(n)	The report must contain	• • •
1. Compliance report	a. Information required in Conditions	Annually or every five (5) years
	54.c.i. and ii.	according to the requirements in
		Condition 54.b.

#### **Emission Unit GDF**

#### **Emission Unit GDF Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Method	Monitoring Condition
OAR 340-244-0231 through 340-244-0252	57-70	VOC	Work Practices, Submerged Fill	Recordkeeping	71, 72

[Conditions 57 through 74 are enforceable only by LRAPA.]

- 57. <u>Applicable Requirement</u>: The emission sources to which OAR 340-244-0231 through OAR 340-244-0252 apply are gasoline storage tanks and all associated equipment components in vapor or liquid gasoline service at a GDF. [OAR 340-244-0234(1)]
- 58. <u>Applicable Requirement</u>: The affected source to which the emission standards apply is each GDF. The affected source includes each gasoline cargo tank during the delivery of gasoline to a GDF, each gasoline storage tank, pressure/vacuum vents on gasoline storage tanks and the equipment necessary to unload product from cargo tanks into the storage tanks at a GDF. [OAR 340-244-0234(2)]
- 59. <u>Applicable Requirement</u>: Each GDF will fall into one or more of the categories listed in this condition. Where multiple categories apply to one GDF, the requirements of each applicable category apply to that GDF. Each GDF category is followed by a number which is used to indicate which rules in this division apply to that GDF: [OAR 340-244-0234(4)]
  - 59.a. A GDF located anywhere in the state that has only gasoline storage tanks with capacity of less than 250 gallons, hereafter referred to as GDF 1. [OAR 340-244-0234(4)(a)]
  - 59.b. A GDF located anywhere in the state with a gasoline storage tank that has a capacity of 250 gallons or more, hereafter referred to as GDF 2. [OAR 340-244-0234(4)(b)]
  - 59.c. A GDF located anywhere in the state with 120,000 gallons or more of annual gasoline throughput, hereafter referred to as GDF 3. [OAR 340-244-0234(4)(c)]
  - 59.d. A GDF located anywhere in the state with 600,000 gallons or more of annual gasoline throughput, hereafter referred to as GDF 4. [OAR 340-244-0234(4)(d)]
  - 59.e. A GDF located anywhere in the state with 1,000,000 gallons or more of annual gasoline throughput, hereafter referred to as GDF 5. [OAR 340-244-0234(4)(e)]
- 60. <u>Applicable Requirement</u>: The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to Condition 68. [OAR 340-244-0234(7)]
- 61. <u>Applicable Requirement</u>: If the affected source ever exceeds an applicable threshold, throughput or otherwise, the affected source will remain subject to the requirements for sources above the threshold, even if the affected source later falls below the applicable threshold. [OAR 340-244-0234(8)]
- 62. Applicable Requirement: For a source that becomes subject to a requirement to install a Stage I vapor

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 21 of 50

balance system, Enhanced Vapor Recovery system, or complete any other equipment change because of an increase in throughput, the permittee must have completed the equipment changes no later than 24 months after the affected source becomes subject to the additional or changed requirement, unless otherwise specified within this division. [OAR 340-244-0234(9)]

- 63. <u>Applicable Requirement</u>: A split compartment gasoline storage tank (i.e., one storage tank that is internally divided to hold two or more different types of liquid) will have each compartment of the tank treated as a separate storage tank for purposes of compliance with OAR 340-244-0231 through OAR 340-244-0252. [OAR 340-244-0234(10)]
- 64. <u>Applicable Requirement</u>: All equipment installed at a GDF that is in gasoline liquid or vapor service must be compatible with gasoline according to the equipment manufacturer's instructions or documentation. [OAR 340-244-0234(12)]
- 65. Applicable Requirement: A permittee that owns or operates a GDF must, at all times, operate and maintain all equipment, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [OAR 340-244-0235(1)]
- 66. <u>Applicable Requirement</u>: Compliance with OAR 340-244-0231 through OAR 340-244-0252 does not exempt the permittee from enforcement for any noncompliance with applicable requirements during a malfunction event. [OAR 340-244-0235(2)]
- 67. <u>Applicable Requirement</u>: A permittee that owns or operates a GDF 3 as described in OAR 340-244-0234(4) must comply with the following requirements: [OAR 340-244-0241(1)]
  - 67.a. All applicable requirements under OAR 340-244-0238; and [OAR 340-244-0241(1)(a)]
  - 67.b. Testing requirements under OAR 340-244-0249. [OAR 340-244-0241(1)(b)]
- 68. <u>Applicable Requirement</u>: Work Practices. A permittee that owns or operates a GDF must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following: [OAR 340-244-0245(1)]
  - 68.a. Minimize gasoline spills; [OAR 340-244-0245(1)(a)]
  - 68.b. Do not top off or overfill vehicle tanks. [OAR 340-244-0245(1)(b)]
    - 68.b.i. If a person can confirm that a vehicle tank is not full after the nozzle clicks off, such as by checking the vehicle's fuel tank gauge, the person may continue to dispense fuel using best judgment and caution to prevent a spill; [OAR 340-244-0245(1)(b)(A)]
    - 68.b.ii. Post sign(s) at the GDF instructing a person filling up a motor vehicle to not top off the vehicle tank. A sign must be placed on each gasoline dispenser, or on a permanent fixture within six (6) feet of the dispenser, and be clearly visible to an individual using the hose and nozzle to dispense gasoline; [OAR 340-244-0245(1)(b)(B)]
  - 68.c. Clean up spills as expeditiously as practicable. The permittee must develop a written plan that describes how a spill will be cleaned up upon occurrence. The plan must include, but is not limited to, where spill materials are located, a brief description of how each is used, and an explanation of how the permittee is implementing the 'as expeditiously as practicable' requirement of this condition. [OAR 340-244-0245(1)(c)]
  - 68.d. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use; [OAR 340-244-0245(1)(d)]
  - 68.e. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators. [OAR 340-244-0245(1)(e)]
  - 68.f. Ensure that cargo tanks unloading gasoline at the GDF comply with Conditions 68.a. through 68.d. [OAR 340-244-0245(1)(f)]

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 22 of 50

69. Applicable Requirement: Submerged Fill. Except for gasoline storage tanks with a capacity of less than 250 gallons, a permittee that owns or operates a GDF must only load gasoline into storage tanks at the GDF by utilizing submerged filling, as defined in OAR 340-244-0232, and as specified in Conditions 69.a., 69.b., or 69.c. The applicable distances in Conditions 69.a. and 69.b. must be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank. [OAR 340-244-0245(2)]

- 69.a. Submerged fill pipes installed on or before Nov. 9, 2006, must be no more than 12 inches from the bottom of the storage tank. [OAR 340-244-0245(2)(a)]
- 69.b. Submerged fill pipes installed after Nov. 9, 2006, must be no more than six (6) inches from the bottom of the storage tank. [OAR 340-244-0245(2)(b)]
- 69.c. Submerged fill pipes not meeting the specifications of Conditions 69.a. and 69.b. are allowed if a permittee that owns or operates a GDF can demonstrate that the liquid level in the tank is and always has been above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by LRAPA during the course of a site visit or upon request within 48 hours. [OAR 340-244-0245(2)(c)]
- 70. <u>Applicable Requirement</u>: Portable gasoline containers that meet the requirements of 40 CFR part 59 subpart F are considered acceptable for compliance with Condition 68.d. [OAR 340-244-0245(4)]
- 71. <u>Monitoring and Recordkeeping Requirement</u>: A permittee that owns or operates a GDF must have records available within 24 hours of a request by LRAPA to document gasoline throughput. [OAR 340-244-0250(1)]
- 72. <u>Monitoring and Recordkeeping Requirement</u>: A permittee that owns or operates a GDF must keep the following records: [OAR 340-244-0250(2)]
  - 72.a. Records related to the operation and maintenance of all equipment in gasoline service, including Stage I vapor balance, Enhanced Vapor Recovery, and Stage II vapor recovery equipment. Any equipment in gasoline or vapor service with a defect, leak, or malfunction must be logged and tracked by the permittee using forms provided by LRAPA or a reasonable facsimile; [OAR 340-244-0250(2)(b)]
  - 72.b. Records of total throughput volume of gasoline, in gallons, for each calendar month; [OAR 340-244-0250(2)(c)]
  - 72.c. Records of permanent changes made at the GDF and equipment in gasoline service which may affect emissions. This includes, but is not limited to, installing new gasoline storage tanks, installing new vapor control equipment, changing vapor control equipment, or removing gasoline storage tanks or vapor control equipment; [OAR 340-244-0250(2)(d)]
  - 72.d. Records of the occurrence and duration of each malfunction of operation, including, without limitation, malfunctions of process equipment or the air pollution control and monitoring equipment; [OAR 340-244-0250(2)(e)]
  - 72.e. Records of actions taken during periods of malfunction to minimize emissions in accordance with Conditions 65 and 66, including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation; [OAR 340-244-0250(2)(f)]
  - 72.f. If subject to Condition 69, submerged fill requirements, the permittee must keep documentation from the equipment manufacturer, a service provider, or other similar documentation which demonstrates that each submerged fill tube is a compliant length. These records must be retained for as long as the permittee is subject to any submerged fill requirements under Condition 69; and [OAR 340-244-0250(2)(g)]
  - 72.g. A copy of the written plan for cleanup of spills required by Condition 68.c. The plan must be retained for as long as the facility meets the definition of a GDF. [OAR 340-244-0250(2)(h)]
- 73. Recordkeeping Requirement: Records required under Condition 72 must be kept for a period of 5 years, unless otherwise specified, and must be made available for inspection and review by LRAPA during the

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 23 of 50

- course of a site visit. [OAR 340-244-0250(3)]
- 74. Reporting Requirement: Annual reports. A permittee that owns or operates a GDF 3 must report, by February 15 of each year, the following information, as applicable: [OAR 340-244-0251(2)]
  - 74.a. The total throughput volume of gasoline, in gallons, for each calendar month and the annual total for the previous calendar year; [OAR 340-244-0251(2)(a)]
  - 74.b. A summary of changes made at the GDF on any equipment in gasoline or vapor service which may affect emissions; [OAR 340-244-0251(2)(b)]
  - 74.c. List of all major maintenance performed on pollution control devices and equipment in gasoline service; [OAR 340-244-0251(2)(c)]
  - 74.d. The number, duration, and a brief description of each malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded; [OAR 340-244-0251(2)(d)]
  - 74.e. A description of actions taken by the permittee that owns or operates a GDF during a malfunction to minimize emissions in accordance with Conditions 65 and 66, including actions taken to correct the malfunction. [OAR 340-244-0251(2)(e)]

#### **Emission Unit MG**

#### **Emission Unit MG Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition	
32-010(2)&(3)	75	Visible Emissions	20% opacity, 6 minute avg.	VE Survey	76	
32-015(2)(c)	78	PM	0.10 gr/dscf	Parametric, O&M	81, 82	
32-045(1)	79	PM	Process Weight Rate Limit	Parametric, O&M	81, 82	
37-0066(3)(c)(A) 32-009(1)	80	PM <sub>2.5</sub>	Short Term NAAQS	Parametric, O&M	81, 82	

- 75. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from Emission Unit MG that equal or exceed an average of 20 percent opacity. When visual determination of opacity is required, opacity must be measured as a six-minute block average using EPA Method 9. [LRAPA 32-010(2)&(3)]
- 76. Monitoring Requirement: The permittee must demonstrate compliance with the opacity limit in Condition 75 by performing a visible emissions survey of the plant. At least once each month for a minimum period of 30 minutes, the permittee must visually survey the plant using EPA Method 22 for any sources of visible emissions. For the purposes of this condition, visible emissions requiring action are considered to be any visible emissions that do not result from mobile or fugitive sources and are not the result of condensed water vapor. The person conducting the EPA Method 22 does not have to be EPA Method 9 certified. However, the individual conducting the EPA Method 22 should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. [LRAPA 34-016(1)]
  - 76.a. If visible emissions are observed using EPA Method 22, the permittee must take corrective action to eliminate the visible emissions within one (1) hour of finishing the visible emissions survey. After taking corrective action to eliminate the visible emissions, the permittee must conduct another visible emissions survey using EPA Method 22 within 24 hours of the previous visible emissions survey.
  - 76.b. If the visible emissions survey performed within 24 hours of the previous visible emissions survey detects visible emissions from the same source(s), the permittee is required to immediately contact LRAPA or perform an EPA Method 9 on the source(s) of visible emissions. If the permittee performs an EPA Method 9 on the source(s) of visible emissions and the results are in compliance

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 24 of 50

with Condition 75, no further action is required beyond the recordkeeping required in Condition 77 If the results of EPA Method 9 are not in compliance with Condition 75, the permittee must immediately contact LRAPA.

- 77. <u>Recordkeeping Requirement</u>: The permittee must keep documentation of all visible emissions surveys required by Condition 76. For all corrective actions taken, the permittee must record the date, time, person or entity performing the corrective action, and the corrective actions taken, as applicable. [LRAPA 34-016(1)]
- 78. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified after April 16, 2015 in excess of 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(c)]
- 79. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 80. <u>Applicable Requirement</u>: The PM<sub>2.5</sub> emissions from Emission Unit MG may not exceed 0.24 pounds per hour. [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
- 81. Monitoring and Recordkeeping Requirement: To demonstrate compliance with Conditions 78 through 80, the permittee must exhaust the particulate matter emissions from Emissions Unit MG to a baghouse whenever this process is operating. The permittee must operate, maintain and calibrate monitoring devices for measuring the pressure drop across the baghouse used to control emissions from this process. The permittee must maintain the pressure drop across the baghouse between 0.5 and 5 inches of water column whenever Emission Unit MG is operating. The permittee may establish alternate operating parameter ranges or values with the approval of LRAPA using the procedures under OAR-340-218. The permittee must measure and record the pressure drop across the baghouse at least once per week while Emission Unit MG is operating. [LRAPA 32-005(1), 32-007(1)(b) and 34-016(1)]
  - 81.a. If the pressure drop across the baghouse exceeds the operating parameter range listed in Condition 81, the permittee must complete a daily visual emissions survey for Emissions Unit MG according to Conditions 76 and 77 for each day that this process is operating, take corrective action to return the baghouse to the operating parameter range listed in Condition 81, and document the corrective actions. The permittee may cease conducting a daily visual emissions survey once the baghouse is operating within the operating parameter range listed in Condition 81.
  - 81.b. If the permittee is unable to conduct the daily visual emissions survey on a particular day due to visual interferences caused by other visible emissions sources (e.g., wildfires) or due to weather conditions such as fog, heavy rain, or snow, the permittee must note such conditions on the monitoring log and make at least three (3) attempts to conduct the visual emissions survey at approximately 2-hour intervals throughout the day.
  - 81.c. Operating Emissions Unit MG when the pressure drop exceeds the operating parameter range listed in Condition 81 is not considered a violation of an emission limit. However, failure to take corrective action will be considered a violation of this permit.
- 82. Monitoring and Recordkeeping Requirement: Operation and Maintenance Plan (O&M Plan) To demonstrate compliance with Conditions 78 through 80, the permittee must prepare and update, as needed, an O&M Plan for any air pollution control equipment associated with Emissions Unit MG. The permittee must submit a copy of the O&M Plan to LRAPA for review upon request. If LRAPA determines the O&M Plan is deficient, LRAPA may require the permittee to amend the plan. At a minimum, the O&M Plan must include inspection schedules for the particulate matter control system, including but not limited the baghouse. The O&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary. [LRAPA 32-007(1)(b) and 34-016(1)]

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 25 of 50

83. Applicable Requirement: 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 a LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:

- 83.a. LRAPA 32-010(2)&(3) 20% opacity as six-minute block average for sources other than wood fired boilers.
- 83.b. LRAPA 32-015(2)(b)(B) 0.14 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 if there are no representative compliance source tests.
- 83.c. LRAPA 32-015(2)(c) 0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified on or after April 16, 2015.
- 83.d. LRAPA 32-030(1)(b)&(3)(b) 0.14 gr/dscf for fuel burning equipment sources installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015 if there are no representative compliance source tests. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
- 83.e. LRAPA 32-030(1)(a)&(3)(b) 0.10 gr/dscf for fuel burning equipment sources installed, constructed, or modified on or after April 16, 2015. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
- 83.f. LRAPA 32-045 process weight limit for non-fugitive, non-fuel burning process equipment.
- 84. Testing, Monitoring, and Recordkeeping Requirement: 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 ODEQ's Source Sampling Manual. [LRAPA 35-0120]

#### SPECIFIC INSIGNIFICANT ACTIVITY REQUIREMENTS

#### Aggregate Insignificant Activity – Emission Unit AIA-1 (Plasma Table with Torch)

- 85. <u>Applicable Requirement</u>: The permittee must comply with the following conditions for Emission Unit AIA-1 (Plasma Table with Torch): [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
  - 85.a. The PM<sub>2.5</sub> emissions from Emission Unit AIA-1 may not exceed 2.03 pounds per day. [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
  - 85.b. The permittee must not use the plasma table with torch for cutting metal more than eight (8) hours in any day
  - 85.c. The permittee must use the plasma table with torch to cut only mild steel.
  - 85.d. The plasma table with torch must be equipped with a water bath such that the device is considered semidry for emission estimation purposes.
- 86. <u>Monitoring and Recordkeeping Requirements</u>: The permittee must keep and maintain the following records for Emission Unit AIA-1 (Plasma Table with Torch): [LRAPA 34-016(1)]
  - 86.a. The total daily hours the plasma table with torch cuts metal for each day of operation;
  - 86.b. Documentation that the plasma table with torch only cuts mild steel; and
  - 86.c. Documentation that the plasma table with torch is equipped with a water bath such that the device is considered semidry for emission estimation purposes.

#### Aggregate Insignificant Activity - Emission Unit AIA-2 (Paint Booth)

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 26 of 50

87. <u>Applicable Requirement</u>: The permittee must comply with the following conditions for Emission Unit AIA-2 (Paint Booth): [LRAPA 37-0066(3)(c)(A) and 32-009(1)]

- 87.a. The PM<sub>2.5</sub> emissions from Emission Unit AIA-2 may not exceed 0.25 pounds per day.
- 87.b. The permittee must not use more than ten (10) gallons per day of coatings.
- 87.c. All spray-applied coatings must be applied in a spray booth equipped with dry filters demonstrated to achieve at least 98% capture of overspray particulate matter emissions. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement.
- 88. <u>Monitoring and Recordkeeping Requirements</u>: The permittee must keep and maintain the following records for Emission Unit AIA-2 (Paint Booth): [LRAPA 34-016(1)]
  - 88.a. The total number of gallons of coating used for each day the paint booth is operated;
  - 88.b. The manufacture's name of each coating applied in the paint booth;
  - 88.c. A safety data sheet or other documentation from the manufacturer that lists the constituents of each coating applied in the paint booth; and
  - 88.d. Documentation that the spray booth dry filters achieve at least 98% capture of overspray particulate matter emissions.

# Aggregate Insignificant Activity - Emission Unit AIA-3 (Welding and Fabrication)

- 89. <u>Applicable Requirement</u>: The permittee must comply with the following conditions for Emission Unit AIA-3 (Welding and Fabrication): [LRAPA 37-0066(3)(c)(A) and 32-009(1)]
  - 89.a. The PM<sub>2.5</sub> emissions from Emission Unit AIA-3 may not exceed 0.18 pounds per day.
  - 89.b. The permittee must not use more than 15 pounds of welding wire/rod in any day.
  - 89.c. The permittee must use only FCAW E71T electrodes.
- 90. <u>Monitoring and Recordkeeping Requirements</u>: The permittee must keep and maintain the following records for Emission Unit AIA-3 (Welding and Fabrication): [LRAPA 34-016(1)]
  - 90.a. The total number of pounds of welding wire/rod used in any day; and
  - 90.b. Documentation that only FCAW E71T electrodes are used for welding.

#### Categorically Insignificant Activity – Emission Unit CIA-1 (Diesel-Fired 150 kW Emergency Generator)

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines – 40 CFR part 63 subpart ZZZZ

- 91. <u>Applicable Requirement</u>: Stationary RICE subject to Regulations under 40 CFR part 60. An affected source that meets the criteria in Condition 91.a must meet the requirements of 40 CFR part 63 subpart ZZZZ by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines. No further requirements apply for such engines under 40 CFR part 63 subpart ZZZZ. [LRAPA 44-150(5)(ffff) and 40 CFR 63.6590(c)]
  - 91.a. A new or reconstructed emergency or limited use stationary RICE with a site rating of less than or equal to 500 brake HP located at a major source of HAP emissions; [LRAPA 44-150(5)(ffff) and 40 CFR 63.6590(c)(6)]

New Source Performance Standards for Stationary Compression Ignition Internal Combustion Engines – 40 CFR part 60 subpart IIII

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 27 of 50

92. Applicable Requirement: Permittees that own and operate a 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in 40 CFR 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE in accordance with Condition 92.a. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4205(b)]

92.a. For engines with a rated power greater than or equal to 37 KW (50 HP), the engine must comply with the Tier 2 or Tier 3 emission standards for new nonroad CI engines for the same rated power as described in Condition 92.a.i. for all pollutants and the smoke standards as specified in Condition 92.a.ii. beginning in model year 2007. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4202(a)(2)]

92.a.i. The permittee must comply with the Tier 3 standards as summarized in the following table: [LRAPA 46-535(3)(dddd) and 40 CFR 1039, Appendix I, Table 3 – Tier 3 Emission Standards]

Rated Power	Starting	NO <sub>X</sub> +NMHC	CO	PM
(kW)	Model Year	(g/kW-hr)	(g/kW-hr)	(g/kW-hr)
$130 \le kW < 560$	2006	4.0	3.5	0.20

92.a.ii. The permittee must not exceed the following smoke standards: [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)]

92.a.ii.A. 20 percent during the acceleration mode. [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)(1)]

92.a.ii.B. 15 percent during the lugging mode. [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)(2)]

92.a.ii.C. 50 percent during the peaks in either the acceleration or lugging modes. [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)(3)]

- 93. <u>Monitoring Requirement</u>: The permit must demonstrate compliance with Condition 92 by purchasing an engine certified by the manufacturer to meet the emission limitations in Conditions 92.a.i. and ii. [LRAPA 32-007 and 32-009(4)]
- 94. <u>Applicable Requirement</u>: The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in Condition 92 over the entire life of the engine. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4206]
- 95. Applicable Requirement: A permittee that owns and operates a stationary CI ICE subject to 40 CFR part 63 subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Pursuant to 40 CFR 80.510(b)(1)(i), the sulfur content for nonroad diesel fuel may not exceed 15 ppm (0.0015 percent by weight). [LRAPA 44-150(5)(ffff), 40 CFR 60.4207(b) and 40 CFR 80.510(b)(1)(i)]
  - 95.a. Sulfur standard. Maximum sulfur content of 15 ppm. [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(b)]
  - 95.b. Cetane index or aromatic content. Diesel fuel must meet one of the following standards: [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(c)]
    - 95.b.i. Minimum cetane index of 40. [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(c)(1)]
    - 95.b.ii. Maximum aromatic content of 35 volume percent. [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(c)(2)]
- 96. <u>Monitoring Requirement</u>: The permittee must meet the monitoring requirements of this condition. In addition, the permittee must also meet the monitoring requirements specified in Condition 97. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4209]
  - 96.a. A permittee that owns or operates an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines must install a non-resettable hour meter

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 28 of 50

prior to startup of the engine. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4209(a)]

- 97. <u>Monitoring Requirement</u>: The permittee must meet the following compliance requirements: [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211]
  - 97.a. A permittee that must comply with the emission standards specified in 40 CFR part 60 subpart IIII must do all of the following, except as permitted under Condition 97.d.: [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)]
    - 97.a.i. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)(1)]
    - 97.a.ii. Change only those emission-related settings that are permitted by the manufacturer; and [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)(2)]
    - 97.a.iii. Meet the requirements of 40 CFR part 1068, as they apply. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)(3)]
  - 97.b. A permittee that owns or operates a 2007 model year and later stationary CI internal combustion engine must comply with the emission standards specified in Condition 92, and must comply by purchasing an engine certified to the emission standards in Condition 92, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in under Condition 97.d. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(c)]
  - 97.c. The permittee must operate the emergency stationary ICE according to the requirements in Conditions 97.c.i. through ii. In order for the engine to be considered an emergency stationary ICE under 40 CFR part 60 subpart IIII, any operation other than emergency operation and maintenance and testing, as described in Conditions 97.c.i. through ii., is prohibited. If the permittee does not operate the engine according to the requirements in Conditions 97.c.i. and ii., the engine will not be considered an emergency engine under 40 CFR part 60 subpart IIII and must meet all requirements for non-emergency engines. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)]
    - 97.c.i. There is no time limit on the use of emergency stationary ICE in emergency situations. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)(1)]
    - 97.c.ii. The permittee may operate the emergency stationary ICE for any combination of the purposes specified in Condition 97.c.ii.A. for a maximum of 100 hours per calendar year. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)(2)]
      - 97.c.ii.A. 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. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)(2)(i)]
  - 97.d. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(g)]
    - 97.d.i. If the permittee owns or operates a stationary CI internal combustion engine greater than or equal to 100 HP and less than or equal to 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of startup, or within one (1) year after an engine and control device is no longer installed, configured, operated, and maintained in

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 29 of 50

accordance with the manufacturer's emission-related written instructions, or within one (1) year after the permittee changes emission-related settings in a way that is not permitted by the manufacturer. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(g)(2)]

- 98. <u>Notification, Reporting and Recordkeeping Requirement</u>: The permittee must meet the following notification, reporting, and recordkeeping requirements: [LRAPA 44-150(5)(ffff) and 40 CFR 60.4214]
  - 98.a. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the permittee is not required to submit an initial notification. Starting with the model years in Table 5 to 40 CFR part 60 subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4214(b)]
- 99. <u>Recordkeeping Requirement</u>: The permittee must keep documentation that the engine is certified by the manufacturer to meet the emission limitations in Conditions 92.a.i. and ii. [LRAPA 34-016]

#### **CLEANER AIR OREGON**

[The conditions under this section are not federally enforceable]

### **Cleaner Air Oregon Source Risk Limits**

- 100. <u>Applicable Requirement</u>: The permittee must comply with the following conditions for Emission Unit AIA-1 (Plasma Table with Torch): [OAR 340-245-0110(1)(a)&(b)]
  - 100.a. The permittee must not use the plasma table with torch for cutting metal more than eight (8) hours in any day
  - 100.b. The permittee must not use the plasma table with torch for cutting metal more than 1,200 hours in any 12-consecutive month period.
  - 100.c. The permittee must use the plasma table with torch to cut only mild steel.
  - 100.d. The plasma table must be equipped with a water bath such that the device is considered semidry for emission estimation purposes.
- 101. <u>Monitoring and Recordkeeping Requirements</u>: The permittee must keep and maintain the following records for Emission Unit AIA-1 (Plasma Table with Torch): [OAR 340-245-0110(5)(a)&(b)]
  - 101.a. The total daily hours the plasma table with torch cuts metal for each day of operation;
  - 101.b. The total number of hours the plasma table with torch cuts metal in any 12-consecutive month period;
  - 101.c. Documentation that the plasma table with torch only cuts mild steel; and
  - 101.d. Documentation that the plasma table with torch is equipped with a water bath such that the device is considered semidry for emission estimation purposes.
- 102. Applicable Requirement: The permittee must comply with the following conditions for Emission Unit AIA-2 (Paint Booth): [OAR 340-245-0110(1)(a)&(b)]
  - 102.a. The permittee must not use more than ten (10) gallons per day of coatings.
  - 102.b. The permittee must not use more than 500 gallons of coatings in any 12-consecutive month period.
  - 102.c. All spray-applied coatings must be applied in a spray booth equipped with dry filters demonstrated to achieve at least 98% capture of overspray particulate matter emissions. The permittee may use published filter efficiency data provided by filter vendors to demonstrate compliance with this requirement.

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 30 of 50

102.d. All manual spray gun cleaning must be done so that an atomized mist or spray of gun cleaning solvent and coating residue is not created outside of a container that collects used gun cleaning solvent.

- 102.e. The permittee must ensure that storage containers used for VOC-containing materials are kept closed at all times except when adding or removing material.
- 103. <u>Monitoring and Recordkeeping Requirements</u>: The permittee must keep and maintain the following records for Emission Unit AIA-2 (Paint Booth): [OAR 340-245-0110(5)(a)&(b)]
  - 103.a. The total number of gallons of coating used for each day the paint booth is operated;
  - 103.b. The total number of gallons of coating used in the paint booth in any 12-consecutive month period;
  - 103.c. The manufacturer's name of each coating applied in the paint booth;
  - 103.d. A safety data sheet or other documentation from the manufacturer that lists the constituents of each coating applied in the paint booth; and
  - 103.e. Documentation that the spray booth dry filters achieve at least 98% capture of overspray particulate matter emissions.
- 104. <u>Applicable Requirement</u>: The permittee must comply with the following conditions for Emission Unit AIA-3 (Welding and Fabrication): [OAR 340-245-0110(1)(a)&(b)]
  - 104.a. The permittee must not use more than 15 pounds of welding wire/rod in any day.
  - 104.b. The permittee must not use more than 5,140 pounds of welding wire/rod in any 12-consecutive month period.
  - 104.c. The permittee must use only FCAW E71T electrodes.
- 105. <u>Monitoring and Recordkeeping Requirements</u>: The permittee must keep and maintain the following records for Emission Unit AIA-3 (Welding and Fabrication): [OAR 340-245-0110(5)(a)&(b)]
  - 105.a. The total number of pounds of welding wire/rod used in any day;
  - 105.b. The total number of pounds of welding wire/rod used in any 12-consecutive month period; and
  - 105.c. Documentation that only FCAW E71T electrodes are used for welding.
- 106. Reporting Requirement: The permittee must report at least annually to LRAPA a verification there has not been a change in zoning within 1.5 kilometers of the source and, if so, whether that change increases the source risk. [OAR 340-245-0100(7)(c)]

#### **Cleaner Air Oregon General Conditions and Disclaimers**

- 107. <u>Applicable Requirement</u>: Reassessment of Risk The permittee must reassess, and submit to LRAPA, the source risk for cancer, chronic noncancer, and acute noncancer risk in accordance with OAR 340-245-0100(8)(e) by no later than 60 days after the following: [OAR 340-245-0100(8)(a)(F)]
  - 107.a. Zoning changes approved and effective within 1.5 kilometers of the source that could increase risk; or [OAR 340-245-0100(8)(a)(F)(i)]
  - 107.b. Land use has changed in a way that could increase risk in any area in which land uses were excluded from the permittee's Cleaner Air Oregon risk assessment under OAR 340-245-0210(1)(a)(F) because such area was not used in a manner allowed by the applicable zoning. [OAR 340-245-0100(8)(a)(F)(ii)]
- 108. <u>Applicable Requirement</u>: Reassessment of Risk The permittee must reassess, and submit to LRAPA, the source risk for cancer, chronic noncancer, and acute noncancer risk in accordance with OAR 340-245-0100(8)(e) based on any of the following:
  - 08.a. The permittee becomes aware that corrections or additional information are needed to revise or update the original risk assessment; [OAR 340-245-0100(8)(a)(H)

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 31 of 50

- 108.b. The permittee proposes to modify any physical feature of the source that was used as a modeling parameter in the risk assessment that may increase risk; [OAR 340-245-0100(8)(a)(D)]
- 108.c. When notified in writing by LRAPA that a Risk Based Concentration in OAR 340-245-8010 Table 2 for a Toxic Air Contaminant that is emitted by this source has been added or the value lowered, leading to a substantial increase in risk; [OAR 340-245-0100(8)(b)(B)]
- 108.d. When notified in writing by LRAPA that the risk assessment procedures in division 245 have changed in a way that would substantially increase risk, or substantially impact the implementation or effectiveness of the Risk Reduction Plan; or [OAR 340-245-0100(8)(b)(C)]
- 108.e. When notified in writing by LRAPA that a previous risk assessment contains errors or omissions that, when corrected, could increase the risk. [OAR 340-245-0100(8)(b)(A)]
- 109. <u>Applicable Requirement</u>: Construction Approval and Permit Modifications The permittee must apply for approval under title 34 and submit fees as required under OAR 340-245-0100(8)(g) for the construction and modification of an Exempt TEU that is subject to National Emission Standards for Hazardous Air Pollutants or New Source Performance Standard requirements. [OAR 340-245-0060(4)(c)(A)]
- 110. <u>Applicable Requirement</u>: Construction Approval and Permit Modifications The permittee must apply for a permit modification under title 37 and/or OAR chapter 340, division 218 and submit fees as required under OAR 340-245-0100(8)(g) for the following:
  - 110.a. Construct or modify a TEU that is:
    110.a.i. Aggregated under OAR 340-245-0060(4)(c)(B)(iii); or
    110.a.ii. Significant under OAR 340-245-0060(4)(c)(C)(i);
  - 110.b. Modify an established Source Risk Limit or any risk limits or conditions required by division 245; [OAR 340-245-0100(8)(a)(B)]
  - 110.c. Request an extension to a compliance date as outlined in OAR 340-245-0100(8)(a)(C);
  - 110.d. Terminate postponement of risk reduction established under OAR 340-245-0150; or [OAR 340-245-0100(8)(a)(E)]
  - 110.e. Modify air monitoring requirements established under OAR 340-245-0230. [OAR 340-245-0100(8)(a)(G)]
- 111. <u>Applicable Requirement</u>: Permit Modification Deadline If LRAPA has provided notice to the permittee that a modification under OAR 340-245-0100(8)(b) is required, the permittee must submit the necessary information required under OAR 340-245-0100(3) to LRAPA 90 days after the date that LRAPA sends such written notice. [OAR 340-245-0100(8)(c)]
- 112. <u>Applicable Requirement</u>: CAO Submittal Deadline Extensions The permittee may request an extension for submittals required under Conditions 107 through 111 in accordance with OAR 340-245-0030(3) by submitting a written request no fewer than 15 days prior to the submittal deadline.

#### PLANT SITE EMISSION LIMITS

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

#### **Plant Site Emission Limits**

Pollutant	Plant Site Emission Limit (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credit (TPY)	
PM	22	3	0	
$PM_{10}$	22	0	0	
PM <sub>2.5</sub>	22	0	0	
CO	24	0	0	

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 32 of 50

#### **Plant Site Emission Limits**

Pollutant	Plant Site Emission Limit (TPY)	Unassigned Emissions (TPY)	Emission Reduction Credit (TPY)
$NO_X$	25	0	0
$SO_2$	1.1	13	0
VOC	249	0	0
GHG as CO <sub>2</sub> e	76,933	0	0

#### **Plant Site Emission Limit Monitoring**

114. To demonstrate compliance with the PSELs in Condition 113, the permittee must monitor and maintain records of the following process parameters: [LRAPA 34-016, 42-0080 and OAR 340-218-0050(3)(a)]

**Process Parameter Monitoring** 

EU ID	<b>Emission Unit</b>	Pollutant	Process Parameter	Measurement Technique	Measurement Frequency
МН	Sawmill/ Planing Mill Activities	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Bone dry tons (BDT)*	Recordkeeping	Monthly
Boiler-3	Boiler-3	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>X</sub> , SO <sub>2</sub> , VOC, GHG	Natural gas combusted	Recordkeeping	Monthly
Boiler-4	Boiler-4	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>X</sub> , SO <sub>2</sub> , VOC, GHG	Natural gas combusted	Recordkeeping	Monthly
Boiler-5	Boiler-5	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>X</sub> , SO <sub>2</sub> , VOC, GHG	Natural gas combusted	Recordkeeping	Monthly
K1-K12	Dimensional and Stud Dry Kilns	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC	Amount of green Douglas fir processed	Recordkeeping	Each charge
K1-K12	Dimensional and Stud Dry Kilns	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC	Amount of green Hemlock processed	Recordkeeping	Each charge
K1-K12	Dimensional and Stud Dry Kilns	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC	Amount of burnt Douglas fir processed	Recordkeeping	Each charge
K1-K12	Dimensional and Stud Dry Kilns	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC	Amount of burnt Hemlock processed	Recordkeeping	Each charge
GDF	Gasoline Dispensing Facility	VOC	Gasoline throughput	Recordkeeping	Monthly, Annual
MG	Mill Grinding	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Static Emission Rate	NA	NA

<sup>\*</sup>The permittee may calculate BDT from other production parameters.

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 33 of 50

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

Where:

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

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

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

 $\Sigma$  = Symbol representing "summation of";

EF = Pollutant emission factor in Condition 116;

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

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

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

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

**Emission Factors Used For Calculating Emissions** 

Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
	Sawmill baghouses	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.001	Lb/BDT	AQGP-010	No
МН	Sawmill target box	PM	0.025	Lb/BDT	Modified AQGP-010	No
	Sawmill target box	PM <sub>10</sub> /PM <sub>2.5</sub>	0.02125	Lb/BDT	Modified AQGP-010	No
		$PM/PM_{10}/PM_{2.5}$	2.5	Lb/MMCF	AQ-EF05	No
		$SO_2$	1.7	Lb/MMCF	AQ-EF05	No
Boiler-3	Combusting natural gas	$NO_X$	0.037	Lb/MMBtu	Manf. Guarantee	No
Bollet-3		CO	0.036	Lb/MMBtu	Manf. Guarantee	No
		VOC	5.5	Lb/MMCF	AQ-EF05	No
		GHG (CO <sub>2</sub> eq.)	117	L/MMBtu	40 CFR 64	No
		PM/PM <sub>10</sub> /PM <sub>2.5</sub>	2.5	Lb/MMCF	AQ-EF05	No
		$SO_2$	1.7	Lb/MMCF	AQ-EF05	No
Boiler-4	Combusting	$NO_X$	0.037	Lb/MMBtu	Manf. Guarantee	No
Bollet-4	natural gas	CO	0.036	Lb/MMBtu	Manf. Guarantee	No
		VOC	5.5	Lb/MMCF	AQ-EF05	No
		GHG (CO <sub>2</sub> eq.)	117	L/MMBtu	40 CFR 64	No
		PM/PM <sub>10</sub> /PM <sub>2.5</sub>	2.5	Lb/MMCF	AQ-EF05	No
		$SO_2$	1.7	Lb/MMCF	AQ-EF05	No
Boiler-5	Combusting	$NO_X$	0.037	Lb/MMBtu	Manf. Guarantee	No
Doller-3	natural gas	CO	0.036	Lb/MMBtu	Manf. Guarantee	No
	- C	VOC	5.5	Lb/MMCF	AQ-EF05	No
		GHG (CO <sub>2</sub> eq.)	117	L/MMBtu	40 CFR 64	No
K1	Processing green	$PM/PM_{10}/PM_{2.5}$	0.02	Lb/MBF	AQ-EF09	No
through	Douglas fir	VOC	1.116	Lb/MBF	AQ-EF09	No

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 34 of 50

Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Source	Emission Factor Verification Testing Condition
K12	Processing green	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.05	Lb/MBF	AQ-EF09	No
	Hemlock	VOC	0.396	Lb/MBF	AQ-EF09	No
	Processing burnt	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.02	Lb/MBF	AQ-EF09	No
	Douglas fir	VOC	0.669	Lb/MBF	Application	No
	Processing burnt	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.05	Lb/MBF	AQ-EF09	No
	Hemlock	VOC	0.238	Lb/MBF	Application	No
GDF	Gasoline throughput	VOC	13.1	Lb/1000 gal	Application	No
MG	Grinding	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	175	Lb/month	Application	No

117. The permittee must register and report in compliance with Chapter 340, Division 215 of the Oregon Administrative Rules, if the source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO<sub>2</sub>e during the previous year. Once a source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO<sub>2</sub>e during a year, the permittee must annually register and report in each subsequent year, regardless of the amount of the source's direct GHG emissions in future years, except as provided in OAR 340-215-0032 and OAR 340-215-0034. Air contamination sources required to register and report under OAR 340-215-0030(2) must register and submit annual emissions data reports to LRAPA under OAR 340-215-0044 by the due date for the annual report for non-greenhouse gas emissions specified in Condition 130, or by March 31 of each year, whichever is later. [LRAPA 34-016, OAR 340-215-0030(2) and 340-340-215-0046(1)(a)]

#### GENERAL TESTING REQUIREMENTS

- 118. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's *Source Sampling Manual.* [LRAPA 35-0120, 35-0140, and OAR 340-218-0050(3)(a)(B)&(C)]
  - 118.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the *Source Sampling Manual* and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
  - 118.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.
  - 118.c. Unless otherwise specified by permit condition or LRAPA-approved source test plan, all compliance source tests must be performed as follows
    - 118.c.i. At least 90% of the design capacity for new or modified equipment;
    - 118.c.ii. At least 90% of the normal maximum operating rate for existing equipment.
    - 118.c.iii. For purposes of this permit, the normal maximum operating rate is defined as the 90<sup>th</sup> 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.
  - 118.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.
  - 118.e. Source test reports prepared in accordance with the ODEQ's Source Sampling Manual must be

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 35 of 50

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 RECORDKEEPING REQUIREMENTS

- 119. The permittee must maintain the following general records where applicable for monitoring required by this permit: [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]
  - 119.a. Date, place as defined in the permit, and time of sampling or measurements;
  - 119.b. Date(s) analyses were performed;
  - 119.c. Company or entity that performed the analyses;
  - 119.d. Analytical techniques or methods used;
  - 119.e. Results of such analyses;
  - 119.f. Operating conditions as existing at the time of sampling or measurement; and
  - 119.g. Records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
- 120. **Specific Recordkeeping**: In addition to the recordkeeping required by Condition 119, the permittee must keep records of the following: [LRAPA 34-016(1) and OAR 340-218-0050(3)(b)]
  - 120.a. Occurrence and length of downtime for all pollution control devices (hours or minutes);
  - 120.b. Annual pollutant emissions calculated each month (tons/year);
  - 120.c. Excess emissions;
  - 120.d. Records required under 40 CFR part 60 subpart Dc under Condition 45;
  - 120.e. Records required under 40 CFR part 63 subpart 5D under Conditions 55 and 56;
  - 120.f. Records required under 40 CFR part 60 subpart IIII under Conditions 98 and 99;
  - 120.g. Records required by Cleaner Air Oregon under Conditions 101, 103, and 105;
  - 120.h. Occurrence and duration of any startup, shutdown, or malfunction in operation;
  - 120.i. Any malfunction of the air pollution control equipment;
- 121. 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 at least five (5) years. [LRAPA 34-016 and OAR 340-218-0050(3)]

#### REPORTING REQUIREMENTS

# **General Reporting Requirements**

- 122. 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)]
  - 122.a. Immediately (within one (1) hours of the event) notify LRAPA of an excess emission event by phone, email, or facsimile; and
  - 122.b. Within 15 days of the excess emissions event, submit a written report that contains the following information:
    - 122.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;
    - 122.b.ii. The date and time the owner or operator notified LRAPA of the event;
    - 122.b.iii. The equipment involved;
    - 122.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
    - 122.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 36 of 50

- approved procedures for a planned startup, shutdown, or maintenance activity were followed;
- 122.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
- 122.b.vii. The final resolution of the cause of the excess emissions; and
- 122.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to LRAPA 36-040.
- 122.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.
- 122.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.
  - 122.d.i. The permittee must follow the startup, shutdown and malfunction plan approved by LRAPA on January 5, 2012 or subsequently approved plan.
- 122.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.
- 122.f. The permittee must maintain and submit to LRAPA a log of planned and unplanned excess emissions, on LRAPA-approved forms, in accordance with LRAPA 36-025. However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period.
- 123. Permit Deviation Reporting. The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA 36-001 through 36-030 must be reported in accordance with LRAPA 36-025. [OAR 340-218-0050(3)(c)(B)]
- 124. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions), the missing record(s) must not be considered a permit deviation provided the data available accounts for 90% of the operating hours in a reporting period. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. [LRAPA 34-015, 34-016, and OAR 340-218-0050(3)(b)]
- 125. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
- 126. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
- 127. The regulatory agencies' addresses are as follows, unless otherwise instructed by LRAPA:

LRAPA 1010 Main Street Springfield, OR 97477 Enforcement and Compliance Assurance Division Region 10 (20-C04) U.S. Environmental Protection Agency 1200 Sixth Avenue, Suite 155 Seattle, WA 98101 Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 37 of 50

## **Specific Reporting Requirements**

128. The permittee must submit three (3) copies of the semi-annual monitoring report, using LRAPA-approved forms, covering the period January 1 to June 30 *by September 1*, and covering the period July 1 to December 31 *by March 1*, unless otherwise approved in writing by LRAPA. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. The semi-annual monitoring report must include the semi-annual compliance certification. All instances of deviations from permit requirements must be clearly identified in such reports. [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]

- 129. The permittee must submit three (3) copies of the annual monitoring report, covering the period January 1 to December 31, using LRAPA-approved forms, *by March 1*. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 130. The annual monitoring report must consist of:
  - 130.a. Annual records of production and process information identified in Condition 114; [LRAPA 34-016 and OAR 340-218-0050(3)]
  - 130.b. Emission Fee Report; [OAR 340 Division 220]
  - 130.c. Excess Emissions Upset Log; [LRAPA 36-025]
  - 130.d. Second Semi-Annual Compliance Certification; [OAR 340-218-0080]
  - 130.e. Reports required by 40 CFR part 60 subpart Dc under Condition 45;
  - 130.f. Reports required by 40 CFR part 63 subpart 5D under Conditions 53 and 54;
  - 130.g. Reports required by 40 CFR part 60 subpart IIII under Condition 98;
  - 130.h. Reports required by title 44 for gasoline dispensing facilities under Condition 74;
  - 130.i. Cleaner Air Oregon change in zoning report under Condition 106;
  - 130.j. Annual emissions for each 12-month period; and [LRAPA 34-016 and OAR 340-218-0050(3)]
  - 130.k. Information as to whether there has been a change in zoning within 1.5 kilometers of the source, and, if so, whether that change increases the source risk. [OAR 340-245-0100(7)(c)]
- 131. The permittee must register and report in compliance with Chapter 340, Division 215 of the Oregon Administrative Rules, if the source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO2e during the previous year. Once a source's direct greenhouse gas emissions meet or exceed 2,500 metric tons CO2e during a year, the permittee must annually register and report in each subsequent year, regardless of the amount of the source's direct GHG emissions in future years, except as provided in OAR 340-215-0032 and OAR 340-215-0034. Air contamination sources required to register and report under OAR 340-215-0030(2) must register and submit annual emissions data reports to LRAPA under OAR 340-215-0044 by the due date for the annual report for non-greenhouse gas emissions specified in Condition 129, or by March 31 of each year, whichever is later. [OAR 340-215-0030(2) and 340-340-215-0046(1)(a)]
- 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)]
  - 132.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 132.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note:* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
  - 132.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition 132.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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 38 of 50

required and in which an excursion or exceedance, as defined under LRAPA title 12, occurred; and 132.d. Such other facts as LRAPA may require to determine the compliance status of the source.

Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

## NON-APPLICABLE REQUIREMENTS

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

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR part 63 subpart CCCCCC (6C)	NESHAP for GDF	Facility is a major source of FHAP

JJW/aa 08/01/2024 Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 39 of 50

#### **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.

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 40 of 50

## G6. <u>Credible Evidence</u>

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

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

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

## G8. 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. <u>Asbestos</u> [40 CFR part 61 subpart M (federally enforceable), OAR 340-248-0240, and LRAPA 43-015 (LRAPA-only enforceable)]

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

G10. Stratospheric Ozone and Climate Protection [40 CFR part 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).

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 41 of 50

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. <u>Inspection and Entry</u> [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.

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 42 of 50

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. <u>Minor Permit Modification</u> [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]

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 43 of 50

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

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

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

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

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

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

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

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

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

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

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

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

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

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 44 of 50

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 Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 45 of 50

## **ATTACHMENT A: Air Pollution Emergencies**

#### Table I

#### AIR POLLUTION EPISODE: ALERT CONDITION

#### **EMISSION REDUCTION PLAN**

## Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

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

#### Part B: Pollution Episode Conditions for Particulate Matter

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

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

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 46 of 50

			C + 1A + Hard and
	Source of Contamination		Control Actions — Alert Level
		3)	Substantial reduction of steam load demands consistent with continuing plant operations.
c	anufacturing industries of the following lassifications:  Primary Metals Industries	1)	Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations.
- - -	Petroleum Refining Chemical Industries Mineral Processing Indus. Grain Industries	2)	Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance.
- P	Paper and Allied Products Wood Processing Industry	3)	Reduction of heat load demands for processing.
		4)	Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

#### Table II

#### AIR POLLUTION EPISODE: WARNING CONDITIONS

## **EMISSION REDUCTION PLAN**

## Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

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

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 47 of 50

- D. No architectural painting or auto finishing;
- E. No venting of dry-cleaning solvents from 2:00 a.m. to 2:00 p.m. (except perchloroethylene).

5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.

#### Part B: Pollution Episode Conditions for Particulate Matter

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

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

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 48 of 50

	Source of Contamination		Control Actions — Warning Level
		4)	Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
C.	Manufacturing industries which require considerable lead time for shut-down including the following classifications:  - Petroleum Refining - Chemical Industries - Primary Metals Industries - Glass Industries - Paper and Allied Products	1) 2) 3) 4)	Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.  Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.  Maximum reduction of heat load demands for processing.  Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence of boiler lancing or soot
D.	Manufacturing industries which require relatively short time for shut-down.	1) 2) 3)	Elimination of air contaminants from manufacturing operations by ceasing, allied operations to the extent possible without causing injury to persons or damage to equipment.  Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.  Reduction of heat load demands for processing.
		4)	Utilization of mid-day (12 noon to 4 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

## Table III

# AIR POLLUTION EPISODE: EMERGENCY CONDITIONS

## **EMISSION REDUCTION PLAN**

- 1. There shall be no open burning by any person of any material.
- 2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.
- 3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture shall immediately cease operation, except the following:
  - A. Police, fire, medical and other emergency services;
  - B. Utility and communication services;

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029
Permit Number: 207459
Page 49 of 50

- C. Governmental functions necessary for civil control and safety;
- D. Operations necessary to prevent injury to persons or serious damage to equipment or property;
- E. Food stores, drug stores and operations necessary for their supply;
- F. Operations necessary for evacuation of persons leaving the area;
- G. Operations conducted in accordance with an approved preplanned emission reduction plan on file with the Agency.
- 4. All commercial and manufacturing establishments not included in these rules shall institute such actions as will result in maximum reduction of air contaminants from their operations which emit air contaminants, to the extent possible without causing injury or damage to equipment.
- 5. The use of motor vehicles is prohibited except for the exempted functions in 3, above.
- 6. Airports shall be closed to all except emergency air traffic.
- 7. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces.
- 8. Any person responsible for the operation of a source of atmospheric contamination listed below shall take all required control actions for this *Emergency Level*.

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

Seneca Sawmill Company, LLC
Expiration Date: August 1, 2029

Permit Number: 207459
Page 50 of 50

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