

**LANE REGIONAL AIR PROTECTION AGENCY**  
1010 Main Street, Springfield, Oregon 97477  
Telephone: (541) 736-1056

**STANDARD AIR CONTAMINANT DISCHARGE PERMIT (ACDP)**

Issued in accordance with provisions of Title 37, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To:  
**Northern Gold Foods (USA), LLC**  
29323 Meadowview Road  
Junction City, Oregon 97448

Information Relied Upon:  
Application Number: 63479, 63526, 64179, &  
64254  
Dated: 01/05/18, 01/08/18, 08/08/18, & 09/27/18

Mailing Address:  
29323 Meadowview Road  
Junction City, Oregon 97448

Land Use Compatibility Statement:  
From: City of Junction City  
Date: October 23, 2017

Permit Number: 205823  
Permit Type: Standard  
SIC: 2065 Candy and Other Confectionery  
Products  
4691 Boiler

Fee Basis:  
Title 37, Table 1, Part B:  
8 – Bakeries, commercial over 10 tons of  
VOC emission per year

Issuance Date: <Date>  
Expiration Date: <Date>

Permitted Sources:  
Natural Gas-Fired Boilers and Ovens  
Baking of Product

**DRAFT**

Issued  
By: \_\_\_\_\_  
Merlyn L. Hough, Director

Effective  
Date: \_\_\_\_\_

Permitted Activities

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

Emission Unit Description

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

Emission Unit ID	Emission Unit Description
GR1	Baking of granola product
OV1, OV2, & OV3	3 – Natural Gas-Fired Ovens
BL1 & BL2	2 – Natural Gas-Fired Boilers
Insignificant Activities (IEU)	Enclosed mixers, 2 Natural Gas-Fired 0.365 MMBtu/hr Hot Water Pressure Washers, 60 kW natural-gas emergency generator and 107 kW diesel emergency generator.

Plant Site Emission Limits (PSELs)

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

**Annual PSELs**  
(tons per year)

Pollutants	PM	PM <sub>10</sub>	PM <sub>2.5</sub>	NO <sub>x</sub>	CO	VOC	GHG
Totals	24	14	9	39	99	48	74,000

4. Any changes in operation that may increase the emissions above the PSEL must be approved by LRAPA. Failure to do so may result in enforcement actions being taken by LRAPA. [LRAPA 34-034]

PSEL Monitoring and Compliance

5. Compliance with the PSELs in Condition 3 is determined using the emission factors provided in Condition 6 for each 12-month rolling period based on the following calculation for each pollutant, except GHGs, for all processes: [LRAPA 42-0080(4)(c)]

$$E = \sum_{i=1}^{12} \frac{EF \cdot P_i}{K}$$

Where: E = Emissions in tons per year;  
 $\Sigma$  = Symbol representing "summation of";  
 i = Month, beginning with the most recent, summing for 12 preceding, consecutive calendar months;  
 EF = Pollutant emission factors (see Condition 6)  
 P = Monthly granola throughput (tons) or natural gas usage (MMscf) (recorded per Condition 11)  
 K = Conversion Factor Constant: 1 ton per 2,000 pounds

6. The permittee must use the following emission factors to estimate process emissions: [LRAPA 42-080(4)(c)]

Granola Baking (EU: GR1)		
Pollutant	Emission Factor	Units
PM	0.2	lb/ton production rate
PM <sub>10</sub>	0.2	lb/ton production rate
PM <sub>2.5</sub>	0.2	lb/ton production rate
VOC	2.0	lb/ton production rate

Oven 1 & 2 (EUs: OV1 & OV2): Natural Gas Combustion		
Pollutant	Emission Factor	Units
PM	2.5	lb/MMscf natural gas combusted
PM <sub>10</sub>	2.5	lb/MMscf natural gas combusted
PM <sub>2.5</sub>	2.5	lb/MMscf natural gas combusted
NO <sub>x</sub>	0.023	lb/hr
CO	0.017	lb/hr
VOC	5.5	lb/MMscf natural gas combusted

Oven 3 (EU: OV3): Natural Gas Combustion		
Pollutant	Emission Factor	Units
PM	2.5	lb/MMscf natural gas combusted
PM <sub>10</sub>	2.5	lb/MMscf natural gas combusted
PM <sub>2.5</sub>	2.5	lb/MMscf natural gas combusted
NO <sub>x</sub>	100	lb/MMscf natural gas combusted
CO	84	lb/MMscf natural gas combusted
VOC	5.5	lb/MMscf natural gas combusted

Boilers (EUs: BL1 & BL2): Natural Gas Combustion		
Pollutant	Emission Factor	Units
PM	0.0075	lb/MMBtu
PM <sub>10</sub>	0.0075	lb/MMBtu
PM <sub>2.5</sub>	0.0075	lb/MMBtu
NO <sub>x</sub>	0.0304	lb/MMBtu
CO	0.0739	lb/MMBtu
VOC	0.0054	lb/MMBtu

Performance Standards and Source-Specific Emission Limitations

7. The permittee must not emit or allow to be emitted any visible emissions from any air contaminant source equal to or exceeding an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(3)]
8. The permittee must not cause, suffer, allow, or permit particulate matter emissions from sources other than fuel burning equipment (EU: GR1) in excess of 0.10 grains per dry standard cubic foot (dscf). [LRAPA 32-015(2)(c)]
9. Particulate matter emissions from any fuel burning equipment (EUs: BL1, BL2, OV1, OV2, and OV3) installed, constructed, or modified after April 16, 2015 must not exceed 0.10 grains per dry standard cubic foot (dscf), corrected to 12% CO<sub>2</sub> or 50% excess air. [LRAPA 32-030(2)]
10. The permittee must conduct dust suppression measures such as, but not limited to, the installation and use of hoods, fans, and fabric filters to enclose and vent any air contaminant generating processes so that fugitive dust associated with the operation will be adequately controlled at all times. [LRAPA 48-015(1)]

Monitoring and Recordkeeping Requirements

11. **By the fifteenth (15<sup>th</sup>) of each month**, the permittee must record the following information for the emissions units listed in Condition 5. A record of the following data must be maintained for a period of five (5) years at the plant site and must be available for inspection by authorized representatives of LRAPA: [LRAPA 34-016(1) and LRAPA 42-0080]

Monitoring or Recordkeeping Parameter	Minimum Recording Frequency
Granola throughput (tons)	Monthly
Oven operation (hours)	Monthly
Natural gas usage (MMscf or MMBtu)	Monthly
Emissions Calculations as detailed in Condition 5	Monthly

Reporting

12. An annual summary to document compliance with the PSEs must be submitted **by February 15<sup>th</sup> each year**. The report must include the information required per Condition 5, 11 and G15. The annual reporting period is January 1<sup>st</sup> through December 31<sup>st</sup>. [LRAPA 34-016(2)]
13. The facility must submit an annual GHG report by March 31<sup>st</sup> of each year, as applicable. The annual reporting period is January 1<sup>st</sup> through December 31<sup>st</sup>. [OAR 340-215-0040]
14. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office: [LRAPA 34-016]

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

Outdoor Burning

15. The permittee is prohibited from conducting outdoor burning, except as may be allowed by LRAPA Title 47. [LRAPA 47-001]

Fee Schedule

16. In accordance with adopted regulations, the permittee shall be invoiced by **October 1<sup>st</sup>** each year for the Annual Fee due **December 1<sup>st</sup>** each year. [LRAPA 37-8020 Table 2]

BE/CMW  
1/8/2019

## ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit
Calendar Year	The 12-month period beginning January 1 <sup>st</sup> and ending December 31 <sup>st</sup>
CFR	Code of Federal Regulation
CO	Carbon Monoxide
DEQ	Oregon Department of Environmental Quality
dscf	Dry Standard Cubic Foot
EF	Emission Factor
EPA	US Environmental Protection Agency
FAAA	Federal Clean Air Act
gr/dscf	Grains per Dry Standard Cubic Foot
I&M	Inspection and Maintenance
lb	pounds
LRAPA	Lane Regional Air Protection Agency
MMBtu	Million British thermal units
MSDS	Material Safety Data Sheet
NA	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO <sub>x</sub>	Nitrogen Oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O <sub>2</sub>	Oxygen
OAR	Oregon Administrative Rules
OERS	Oregon Emergency Response System
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particle Matter
PM <sub>10</sub>	Particulate Matter less than 10 microns in size
PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns in size
ppm	Part per million
PSD	Prevention of Significant Deterioration
PSEL	Plant Site Emission Limit
PTE	Potential to Emit
RM	Raw Material
scf	Standard Cubic Foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur Dioxide
VE	Visible Emissions
VOC	Volatile Organic Compound
Year	A period consisting of any 12-consecutive calendar months

## **GENERAL PERMIT CONDITIONS**

### General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [LRAPA 37-0020(3)]
- G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.

### Performance Standards and Emission Limits

- G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]
- G5. No person shall discharge from any source whatsoever such quantities of air contamination which cause injury or damage to any persons, the public, business or property. Such determination to be made by LRAPA. [LRAPA 32-090(1)]
- G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]
- G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]
- G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050(2)]
- G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(1)]
- G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

### Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition, including but not limited to excess emissions

resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. Sources that do not emit air contaminants in excess of any applicable rule or permit condition are not subject to the recordkeeping and reporting requirements in LRAPA Title 36. Emissions in excess of applicable standards are not excess emissions if the standard is in an NSS or NESHAP and the NSPS or NESHAP exempts startups, shutdowns and malfunctions as defined in the applicable NSPS or NESHAP. [LRAPA 36-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. For all other excess emissions not addressed in LRAPA Sections 36-010, 36-015, or 36-040, the following requirements apply: [LRAPA 36-020(1)]
- a. The owner or operator, of a small source, as defined by LRAPA 36-005(7), need not notify LRAPA of excess emissions events immediately unless otherwise required by permit condition, written notice by LRAPA, or if the excess emission is of a nature that could endanger public health.
  - b. Notification must be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. – 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.
  - c. Follow-up reporting, if required by LRAPA, must contain all information required by Condition G15.
- G13. At each annual reporting period specified in this permit, or sooner if required by LRAPA, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)(a)]
- G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. The upset log shall include the following: [LRAPA 36-025(3) and 36-030(1)]
- a. date and time each event was reported to LRAPA;
  - b. whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  - c. whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;
  - d. whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
  - e. final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for five (5) calendar years. [LRAPA 36-02(3)]

Excess Emissions: Scheduled Maintenance

- G16. If the permittee anticipates that scheduled maintenance of air contaminant sources or air pollution control devices may result in excess emissions, the permittee must obtain prior LRAPA



authorization of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance must be submitted and received by LRAPA in writing at least seventy-two (72) hours prior to the event. The application must include the following: [LRAPA 36-015(1)]

- a. reasons explaining the need for maintenance, including but not limited to: why the maintenance activity is necessary; why it would be impractical to shut down the source operation during the maintenance activity; if applicable, why air pollution control devices must be by-passed or operated at reduced efficiency during the maintenance activity; and why the excess emissions could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
  - b. identification of the specific production or emission control device or system to be maintained;
  - c. identification of the nature of the air contaminants likely to be omitted during the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and
  - d. identification of specific procedures to be followed which will minimize excess emissions at all times during the scheduled maintenance.
- G17. No scheduled maintenance associated with the approved procedures in Condition G16 that is likely to cause excess emissions may occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced yellow or red woodstove advisory period, in areas determined by LRAPA as PM<sub>2.5</sub> or PM<sub>10</sub> nonattainment areas. [LRAPA 36-015(6)]
- G18. In cases where LRAPA has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-015(3), the permittee shall immediately notify LRAPA by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015-7]

#### Air Pollution Emergencies

- G19. The permittee must, upon declaration of an air pollution alert, air pollution warning, or air pollution emergency, take all emission reduction measures specified in Tables 1, 2, and 3 of LRAPA Title 51. Permittee responsible for a source of air contamination within a Priority I AQCR must, upon declaration of an episode condition affecting the locality of the air contamination source, take all appropriate actions specified in the applicable table and must take all appropriate actions specified in an LRAPA-approved preplanned abatement strategy for such condition which has been submitted and is on file with LRAPA. [LRAPA 51-015]

#### Notification of Construction/Modification

- G20. The permittee must notify LRAPA in writing using an LRAPA "Notice of Intent to Construct" form, or other permit application forms and obtain approval in accordance with LRAPA 34-010 and 34-034 through 34-038 before:
- a. constructing, installing or establishing a new stationary source that will cause an increase in regulated pollutant emissions

- b. making any physical change or changes in the operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or
- c. constructing or modifying any pollution control equipment.

#### Notification of Name Change

- G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation Division of the State of Oregon.

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

#### Permit Renewal

- G22. Application for renewal of this permit must be submitted not less than 120 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDPs. [LRAPA 37-0040(2)(b)]
- G23. A source may not be operated after the expiration date of a permit, unless any of the following occur prior to the expiration date of the permit; [LRAPA 37-0082(1)(a)]
- a. A timely and complete application for renewal or for an LRAPA Title V Operating Permit has been submitted; or
  - b. Another type of permit, ACDP, or Title V, has been issued authorizing operation of the source.
- G24. For a source operating under an ACDP or LRAPA Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. [LRAPA 37-0082(1)(c)]
- G25. Any permittee who fails to submit any relevant facts or who has submitted incorrect information in a permit application must, upon becoming aware of such failure or incorrect submittal, promptly submit such supplementary facts or corrected information. [LRAPA 37-0040(4)]

#### Termination Conditions

- G26. This permit shall be automatically terminated upon: [LRAPA 37-0082(2)]
- a. Issuance of a renewal or new ACDP for the same activity or operation;
  - b. Written request of the permittee, if LRAPA determines that a permit is no longer required;
  - c. Failure to submit a timely application for permit renewal. Termination is effective on the permit expiration date; or;
  - d. Failure to pay annual fees within 90 days of invoice by LRAPA, unless prior arrangements for payment have been approved in writing by LRAPA.

- G27. If LRAPA determines that a permittee is in noncompliance with the terms of the permit, submitted false information in the application or other required documentation, or is in violation of any applicable rule or statute, LRAPA may revoke the permit. LRAPA will provide notice of the intent to revoke the permit to the permittee under LRAPA Title 31. The notice will include the reasons why the permit will be revoked, and include an opportunity for the permittee to request a contested case hearing prior to the revocation. A written request for hearing must be received by LRAPA within 60 days from service of the notice on the permittee and must state the grounds of the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The permit will continue in effect until the 60<sup>th</sup> day after service of the notice on the permittee, if the permittee does not timely request a hearing, or until a final order is issued if the permittee timely requests a hearing. [LRAPA 37-0082(4)(a)]
- G28. A permit automatically terminated under LRAPA 37-0082(2)(b) through (2)(d) may only be reinstated by the permittee by applying for a new permit. The permittee must also pay the applicable new source permit application fees in this title unless the owner or operator submits the renewal application within three (3) months of the permit expiration date. [LRAPA 37-0082(3)]
- G29. If LRAPA finds there is a serious danger to the public health, safety or the environment caused by a permittee's activities, LRAPA may immediately revoke or refuse to renew the permit without prior notice or opportunity for a hearing. If no advance notice is provided, notification will be provided to the permittee as soon as possible as provided in LRAPA Title 31. The notification will set forth the specific reasons for the revocation or refusal to renew and will provide an opportunity for the permittee to request a contested case hearing for review of the revocation or refusal to renew. A written request for a hearing must be received by LRAPA within 90 days of service of the notice on the permittee and the request must state the grounds for the request. The hearing will be conducted as a contested case hearing under ORS 183.413 through 183.470 and LRAPA Title 14. The revocation or refusal to renew becomes final without further action by LRAPA if a request for a hearing is not received within the 90 days. If a request for a hearing is timely received, the revocation or refusal to renew will remain in place until issuance of a final order. [LRAPA 37-0082(4)(b)]
- G30. Any hearing requested shall be conducted pursuant to the rules of LRAPA. [LRAPA Title 14]

Asbestos

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

[Revised 1/12/2018]