

**LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT**

Lane Regional Air Protection Agency
1010 Main Street, Springfield, Oregon 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:

Murphy Company
Prairie Road Panelboard Plant
2350 Prairie Road
Eugene, OR 97404

INFORMATION RELIED UPON:

Permit No.: 203102
Application Number: 61347,64247
Received: March 8, 2016, September
26, 2018

PLANT SITE LOCATION:

2350 Prairie Road
Eugene, Oregon 97404

LANE USE COMPATIBILITY STATEMENT:

Issued by: City of Eugene
Dated: 5/29/97

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

DRAFT

Merlyn L. Hough, Director

Date

Nature of Business: Panelboard/Plywood Manufacturing
Primary SIC: 2435 Panelboard manufacturing, 10,000 or more sqft/hr, 3/4" basis finished product
Other SIC: 4961 Fuel-burning equipment inside AQMA, wood-fired, 10 million or more Btu/hr heat input

RESPONSIBLE OFFICIAL:

Title: General Manager
Title: President
Phone (541) 461-4545

FACILITY CONTACT PERSON:

Name: Robert Radley, Kris York and John Murphy
Title: General Manager and President
Phone: (541) 461-4545

TABLE OF CONTENTS

LIST OF ABBREVIATIONS USED IN THIS PERMIT 3

**EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD)
IDENTIFICATION 4**

EMISSION LIMITS AND STANDARDS..... 5

PLANT SITE EMISSION LIMITS 8

MONITORING REQUIREMENTS 9

REPORTING REQUIREMENTS..... 17

GENERAL CONDITIONS 21

LIST OF ABBREVIATIONS USED IN THIS PERMIT

AQMA	Air Quality Management Area	MSF	1,000 square feet
ASTM	American Society of Testing and Materials	NA	Not applicable
BDT	Bone dry ton	Neg.	Negligible
BF	Board feet	NO _x	Nitrogen oxides
CFR	Code of Federal Regulations	O ₂	Oxygen
CO	Carbon monoxide	OAR	Oregon Administrative Rules
DEQ	Oregon Department of Environmental Quality	ODEQ	Oregon Department of Environmental Quality
dscf	Dry standard cubic foot of gas volume at 29.92" Hg and 68°F	ORS	Oregon Revised Statutes
EF	Emission factor	O&M	Operation and maintenance
EPA	US Environmental Protection Agency	Pb	Lead
EU	Emissions unit	PCD	Pollution control device
FCAA	Federal Clean Air Act	PM	Particulate matter
gr/dscf	Grain per dry standard cubic foot	PM ₁₀	Particulate matter less than 10 microns in size
GHG	Greenhouse Gas	PM _{2.5}	Particulate matter less than 2.5 microns in size
HAP	Hazardous Air Pollutant	PSEL	Plant Site Emission Limit
ID	Identification number	RMP	Risk management plans
I&M	Inspection and maintenance	SDS	Safety Data Sheet
LRAPA	Lane Regional Air Protection Agency	SERP	Strategic Emission Reduction Plan
MB	Material balance	SO ₂	Sulfur dioxide
MBF	1,000 board feet	ST	Source test
Mlb	1,000 pounds	VE	Visible emissions
MMBtu	Million British Thermal Units	VMT	Vehicle mile traveled
MSDS	Material safety data sheet	VOC	Volatile organic compound

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

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

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010, 340-218-0120(2) and LRAPA 34-180]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA, and citizens under the Clean Air Act, except as specified below:
 - 2.a. Conditions 5, 6, G5, and G9 which are enforceable by LRAPA only. [OAR 340-218-0060]

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

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

EU and PCD Identification

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Veneer Drying Operations Veneer Dryer #1 Veneer Dryer #2	EU-01	Packed-bed Wet Scrubber	VDSC
East Fuel Cell (EU-01 heat source)	EU-01A	Packed-bed Wet Scrubber	VDSC
Plywood Production Hot Press #1 and #2	EU-02	None	NA
Finishing Line Painting and Coating Operations Drying Ovens	EU-03	None	NA
Wood Residuals Conveying System A Core Saws Skinner and Cutoff Saws Sanding Lines Groovers Big Cyclone Buffers #2 Metering Bin Cyclone	EU-04	Baghouse	Bag-1, Bag-2, and Bag-3
Wood Residuals Conveying System B Metering Bin Cyclone	EU-05	Baghouse	Bag-4
Paved and Unpaved Road Emissions	EU-07	None	NA
West Fuel Cell	EU-08	Dry ESP	NA
Hogged Fuel Pile	EU-09	Enclosed Building	NA
Putty Patching Operations, VOC only	EU-10	None	NA
Aggregate Insignificant Emissions #1 Natural Gas Boiler #2 Natural Gas Boiler Paper Cyclone Sample Department Cyclone Carpenter Shop Cyclone Rubber Cyclone	EU-AGG	None	NA

EMISSION LIMITS AND STANDARDS

The following table contains summaries of facility-wide applicable requirements other than the Plant Site Emission Limits (PSELs), along with the monitoring methods for the emissions units to which those requirements apply.

Facility-wide Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015	4	Fugitive Dust	minimize	I&M Recordkeeping	22
49-010	5	Nuisance	no nuisance	Recordkeeping	23
32-055	6	PM Fallout >250 microns	no fallout	I&M Recordkeeping	23
51-015	7	SERP	Reduce Emissions	Recordkeeping	25
33-060(3)(a)(F)	8	Concealment & Masking	Prohibited	I&M Recordkeeping	39
40 CFR Part 68	9	Risk Management Plan	Risk Management Plan	NA	9
33-060(3)(b)	10	PM – Board Products Rule	1.0 lb PM per 1,000 square feet, 3/8”basis	NA	10.a

4. 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].
 - 4.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
 - 4.b. Application of water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
 - 4.c. Full or partial enclosure of materials stockpiles in cases where application of water or other suitable chemicals is not sufficient to prevent particulate matter from becoming airborne;
 - 4.d. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
 - 4.e. Adequate containment during sandblasting or other similar operations;
 - 4.f. The covering of moving, open-bodied trucks transporting materials likely to become airborne;
 - 4.g. The prompt removal from paved streets of earth or other material which does or may become airborne.

Nuisance Conditions

5. The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010]. This condition is only enforceable by LRAPA.
6. The permittee must not emit particulate matter which is greater than 250 microns in size at such duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is only enforceable by LRAPA.
7. In the event an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee must take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee must take action when the permittee first becomes aware of such declaration whether through news media, direct contact with LRAPA, or from other sources.
8. The permittee must not willfully cause or permit the installation or use of any means, such as dilution, which without resulting in a reduction in the total amount of air contaminants emitted, conceals emission of air contaminants which would otherwise violate the limits in this permit or LRAPA rules. [LRAPA 33-060(3)(a)(F)]

Accidental Release Prevention

9. Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]

Board Products Rule

10. The permittee must not cause to be emitted particulate matter from the plywood mill sources, including but not limited to, sanders, saws, presses, in excess of a total from all sources within the plant site of an average hourly emission rate (lb/hr) based on the maximum hourly production capacity of the facility times one (1.0) pound per 1000 square feet of production. Production is expressed in terms of 1000 square feet of plywood production on a 3/8 inch basis of finished product equivalent. The maximum hourly production capacity is the maximum production capacity for a typical operating shift divided by the number of hours in the operating shift. [LRAPA 33-060(3)(b)]

10.a. Monitoring Requirement: The permittee must demonstrate compliance by performing the calculations required in Condition 32 and summing the emissions from the affected sources as determined by emission factor calculations for a twenty-four hour period divided by 24. [LRAPA 33-060(3)(d)]

Emissions Unit Specific Emission Limits and Standards

Emissions Unit	EU ID	Applicable Requirement	Condition No.	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
						Method	Condition No.
Veneer Dryers and East Fuel Cell	EU-01 and EU-01A	33-060(3)(a)(B)	11	Visible Emissions	10% average opacity 20% maximum opacity	VE Periodic Monitoring	27
		33-060(3)(a)(E)	16	O&M	Minimize emissions	O&M Recordkeeping	27.c and 30
		33-060(3)(a)(C)(i)	12.a	PM	0.75 lbs/msf 3/8" basis for fuel with moisture content of 20% or less (by weight)	Stack Testing and Recordkeeping	27.c, 29, and 31
		33-060(3)(a)(C)(ii)	12.b	PM	1.50 lbs/msf 3/8" basis for fuel with moisture content greater than 20% (by weight)	Stack Testing and Recordkeeping	27.c, 29, and 31
Plywood Presses	EU-02 – Hot Press #1	32-010(2)	15	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	27
	EU-02 – Hot Press #2	32-010(2)	15	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	27
Residuals Handling A	EU-04	32-010(2)	15	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	27
		32-015(2)(b)(B)	17	PM	0.14 gr/dscf	Stack Testing and Recordkeeping	26 and 27
Residuals Handling B	EU-05	32-010(2)	15	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	27
		32-015(2)(b)(B)	17	PM	0.14 gr/dscf	Recordkeeping	26 and 27
Roads	EU-07	48-015	15	Fugitive Emissions	Minimize	VE Periodic Monitoring	22
West Fuel Cell	EU-08	32-010(2)	15	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	27
		32-020(1)(a)	13	PM	0.10 gr/scf exhaust gas corrected to 12% CO ₂	Stack Testing and Recordkeeping	27
		40 CFR 63 Subpart JJJJJJ	37	HAPs	Biennial Tune-up	Biennial Tune-up Records and Reports	37.b37.c, 37.d, 37.e

Emissions Unit	EU ID	Applicable Requirement	Condition No.	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
						Method	Condition No.
Hogged Fuel Pile	EU-09	48-015	15	Fugitive Emissions	Minimize	VE Periodic Monitoring	22

11. The permittee must not operate any veneer dryer such that visible air contaminants emitted from any dryer stack or emission point exceeds:
 - 11.a. A daily average operating opacity of 10% on more than two days within any 12-month period, with the days separated from each other by at least 30 days, as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(i)]
 - 11.b. A maximum opacity of 20% at any time as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(ii)]
12. Particulate emissions from each veneer dryer (EU-01) must not exceed:
 - 12.a. 0.75 pounds per 1,000 square feet of veneer dried (3/8" basis) at maximum production for units using fuel which has a moisture by weight of 20% or less on a weight basis as measured by ASTM D442-84, and [LRAPA 33-060(3)(a)(C)(i)],
 - 12.b. 1.50 pounds per 1,000 square feet of veneer dried (3/8" basis) at maximum production for units using fuel which has a moisture content by weight of greater than 20% on a weight basis as measured by ASTM D442-84. [LRAPA 33-060(3)(a)(C)(ii)]
13. To determine compliance with Condition 12, particulate emissions must be measured/monitored in accordance with Conditions 27.c, 28, 29 and 31. [LRAPA 35-0160]
14. The permittee must not cause or allow the emission of particulate matter in excess of 0.10 grain per standard cubic foot, corrected to 12% CO₂, from emissions units West Fuel Cell (EU-08). [LRAPA 32-030(1)(a)] PM emissions must be measured in accordance with Condition 27.
15. The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions units Plywood Presses (EU-02), Wood Residuals Conveying Systems (EU-04 and 05), or West Fuel Cell (EU-08), for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(2)] Visible emissions must be measured in accordance with Conditions 22 and 27.
16. Each veneer dryer, emissions unit Veneer Dryers (EU-01), must be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment must be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. [LRAPA 33-060(3)(a)(E)]
 - 16.a. The permittee must inspect all veneer dryers (EU-01) for fugitive emissions in accordance with an inspection and maintenance (I&M) plan. The I&M plan must be reviewed at least once every 12 months and revised for any necessary changes as determined by maintenance personnel. [LRAPA 32-007]
 - 16.b. The permittee must take corrective action anytime the inlet Packed Bed Scrubber gas temperature on the veneer dryers (EU-01) is equal to or exceeds 165°F. [LRAPA 32-007] Variances from the action level range are not considered violations of this permit as long as the permittee takes corrective action to regain the range in a timely manner.
17. The permittee must not cause or allow the emission of any particulate matter from the Wood Residuals Conveying System (EU-04 & 05) in excess of 0.14 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)(B)] Particulate matter emissions must be measured in accordance with Conditions 21 and 28.

Insignificant Activities Requirements

18. LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in LRAPA Title 12 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 18.a. 32-010(2) – 20% opacity for a period or periods aggregating more than three minutes in any hour for sources other than wood fired boilers.
 - 18.b. 32-015(2)(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.
 - 18.c. 32-015(2)(c) – 0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified after April 16, 2015).
 - 18.d. 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.
 - 18.e. 32-030(1)(c)&(3)(b) – 0.10 gr/dscf for fuel burning equipment sources installed, constructed, or modified after April 16, 2015. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
 - 18.f. 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment)

Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in LRAPA Title 12 and perform the testing in accordance with the DEQ’s Source Sampling Manual.

PLANT SITE EMISSION LIMITS (PSELs)

19. The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040, 42-0041, 42-0043, 42-0045]

Pollutant	PSEL (tons/yr)	Unassigned Emissions (tons/yr)	Monitoring Requirements	
			Method	Permit Condition
PM	33	8	EF and I&M Recordkeeping	32
PM ₁₀	33	1	EF and I&M Recordkeeping	32
PM _{2.5}	14	15	EF and I&M Recordkeeping	32
CO	172	0	EF Recordkeeping	32
NO _x	48	0	EF Recordkeeping	32
SO ₂	39	0	EF & MB Recordkeeping	32
VOC	50	40	EF and MB Recordkeeping	32
HAPs	9 –single HAP 24-total HAPs	NA	EF Recordkeeping	36
GHG	74,000	0	Annual Reporting	45

TESTING REQUIREMENTS [LRAPA 35-0140 and 340-218-0050(3)(a)]

20. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ's *Source Sampling Manual*. [LRAPA 35-0140 and 35-0160]
 - 20.a. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test or within the 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.
 - 20.b. Unless otherwise specified by a permit condition, all compliance source tests must be performed at levels that equal or exceed 90 % of the normal maximum operating rate. For the purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test.
 - 20.c. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. There must be at least two (2) valid test runs for demonstrating compliance with the emission limit or standard.
 - 20.d. Source test reports, prepared in accordance with the DEQ's *Source Sampling Manual*, must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.
21. Within twelve (12) months of the permit expiration date the permittee the permittee must conduct emission factor verification tests in accordance with the DEQ Source Sampling Manual and the testing requirements specified in Condition 20 for the emission units/emission factors identified in Condition 33. [LRAPA 35-0140 and 35-0160]
 - 21.a. The compliance testing required for the West Fuel Cell (EU-08) may be used to satisfy this requirement in full or in part.
 - 21.b. The permittee must notify LRAPA at least 15 days prior to conducting any emission factor verification tests by submitting a source test plan in accordance with the DEQ's *Source Sampling Manual*.
 - 21.c. The permittee must submit a summary of all emission factor verification tests to LRAPA within 60 days of any test. The summary must include the following information: emission unit and monitoring point identification; emission results in pounds per hour and emission factor units; process parameters during the test (e.g., material throughput, steam production, etc.); and control device operating parameters.
 - 21.d. The emissions factors listed in Condition 33 are not enforceable limits unless otherwise specified in this permit. Compliance with PSEs must only be determined by the calculations contained in Condition 32 of this permit using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 33.

MONITORING REQUIREMENTS [OAR 340-218-0050(3)(a) and 40 CFR Part 64]

Facility-wide Monitoring:

22. At least once each week for a minimum period of 30 minutes, the permittee must visually survey the facility for any sources of excessive fugitive emissions. For the purpose of this survey, excessive emissions are considered to be any visible emissions that leave the plant site boundaries for more than 18 seconds in a six-minute period. The person conducting the observation must follow the procedures of EPA Method 22. If visible emissions are identified, the permittee must: [OAR 340-218-0050(3)(a)]
 - 22.a. immediately take corrective action to minimize the fugitive emissions including but not limited to those actions identified in Condition 4, or
 - 22.b. develop an LRAPA-approved fugitive emission control plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period;

- 22.c. the permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 22 tests.
23. The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of the nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. This condition is enforceable by LRAPA [OAR 340-218-0050 (3)(a)]
24. The permittee must maintain records of all permit related documents and application materials pertaining to emissions of air contaminants. [OAR 340-218-0050(3)(a)]
25. The permittee must maintain records of air pollution episodes and emission reduction actions taken in a maintenance log for monitoring pertaining to Condition 7. [OAR 340-218-0050(3)(a)]
26. Monitoring Requirement (Compliance Assurance Monitoring). In order to demonstrate continuous compliance with the PM grain loading and process weight limits in Conditions 17 and 18, the permittee must operate the baghouses used to control PM emissions from Residuals Handling (EU-04 and 05) such that the pressure drop across any baghouse is not less than 0.5 inches nor greater than 8.5 inches of water column. The permittee must use the following compliance assurance methods: [OAR 340-218-0050(3)(a) and 40 CFR Part 64.3]
- 26.a. **Once each day**, the permittee must monitor the pressure drop across the baghouses used to control PM emissions from Residuals Handling (EU-04 and 05).
- 26.b. **Once each quarter**, the permittee must inspect the baghouses used to control PM emissions from EU 8 for wear, plugging, abrasion, and integrity of mechanical and ancillary systems.
- 26.c. **Once each quarter**, the permittee must perform visible emissions survey in accordance with the Condition 27.
- 26.d. The permittee must take corrective action to return to the highest reasonable efficiency and effectiveness, all air pollution control equipment and emission reduction processes that the regular inspections show to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parameter action levels (0.5 to 8.5 inches of water column). The exceedance of a parameter action level must not itself be considered a violation of the emission limits in Conditions 17 and 18. [LRAPA 32-007]
- 26.e. The results of the Compliance Assurance monitoring and any repair activities must be recorded in a log.

Emissions Units Monitoring:

27. The permittee must monitor visible emissions from emissions units Veneer Dryers (EU-01), Plywood Presses (EU-02), Residuals Handling (EU-04 and 05), and the West Fuel Cell (EU-08), in accordance with the following procedures, test methods, and frequencies: [OAR 340-218-0050(3)(a)]
- 27.a. Modified EPA Method 9 must be used to determine opacity in accordance with the DEQ Source Sampling Manual. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit, then the observation period must be a minimum of 60 minutes, or until a violation of the emissions standard has been documented, whichever is a shorter period.
- 27.b. Visible emissions testing, using modified EPA Method 9, may be waived for emission units Veneer Dryers (EU-01), Plywood Presses (EU-02), Residuals Handling (EU-04 and 05), and the West Fuel Cell (EU-08), provided all of the following conditions are met:
- 27.b.i. The permittee must conduct a 6-minute visible emissions survey of each emissions unit using EPA Method 22; and
- 27.b.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.

- 27.b.iii. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.
- 27.b.iv. If the observer is unable to conduct the survey and/or EPA Method 9 tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
- 27.c. During each regularly scheduled maintenance outage of the West Fuel cell (EU-08), the permittee must inspect the Packed Bed Scrubber (VDSC) on the Veneer Dryers (EU-01) for physical degradation, including but not limited to missing spray nozzles that could affect the performance of the control device. The permittee must make all necessary repairs to the scrubber to ensure efficient operation. The results of the inspection and any repair activities must be recorded in a log.
- 27.d. For the West Fuel Cell (EU-08), the permittee must operate the ESP according to manufacturer's recommendations. At minimum, weekly measurement must be taken and recorded to monitor ESP operations. The measurements must include at a minimum, DC voltage and amperage readings of the ESP power supply. The values must be consistent with manufacturer's recommendation for good operations. These measurements must be kept on file for a period of at least five (5) years and be available to LRAPA for review. Variances from the established action levels are not considered violations of this permit as long as the permittee takes corrective action to regain the range in a timely manner.
- 28. For emissions unit Veneer Dryers (EU-01), the permittee must monitor and record the gas temperature at the scrubber inlet each operating day. The temperature monitoring device must be installed, operated, maintained, and calibrated in accordance with the manufacturer's written instructions. [OAR 340-218-0050(3)(a)]
 - 28.a. Monitoring for the action level for Veneer Dryers (EU-01) identified in Condition 28 must be less than 165°F. If at any time the temperature reaches 165°F or higher, the permittee must take action as described in Condition 28.b.
 - 28.b. The permittee must record any exceedance of action level noted during the monitoring required by this condition and take immediate corrective action to return dryers and scrubbers to highest and best practicable treatment control. The corrective action must be recorded in a log. Variances from the established action levels are not considered violations of this permit as long as the permittee takes corrective action to regain the range in a timely manner.
- 29. Monitoring of Conditions 12.a and 12.b pertaining to emissions unit Veneer Dryers (EU-01) must be considered fulfilled by permanent routing of emissions unit Veneer Dryers (EU-01) emissions through the scrubber (VDSC). [OAR 340-218-0050(3)(a)]
- 30. Inspection and maintenance activity of Veneer Dryers (EU-01) must be recorded on inspection and maintenance forms. [OAR 340-218-0050(3)(a)]
- 31. For emissions units Veneer Dryers (EU-01), Plywood Presses (EU-02), and Residuals Handling (EU-04 and 05), the permittee must monitor the production and material usage. The permittee must maintain the following records at a minimum: [OAR 340-218-0050(3)(a)]
 - 31.a. Daily and annual square feet dried in Veneer Dryers (EU-01) (square feet (3/8"));
 - 31.b. Daily and annual throughput of Plywood Presses (EU-02) (MSF - 3/8" basis); and
 - 31.c. Hours of operation for Residuals Handling (EU-04 and 05).

Plant Site Emission Limits Monitoring:

32. The permittee must determine compliance with the PSELs, except GHGs, using the following monitoring and calculation procedures: [LRAPA 35-0140 and 35-0160]

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

PSEL Recordkeeping Requirements

Emissions Unit(s)	Process Parameter	Units	Measurement Frequency
Veneer Dryers (EU-01)	Veneer Dried Square Footage & Thickness	1000 Square Feet (MSF 3/8" basis)	Daily
East Fuel Cell (EU-01A)	Wood Fuel Used	Tons	Weekly
Plywood Presses (EU-02)	Plywood Production Square Footage & Thickness	1000 Square Feet (MSF 3/8" basis)	Daily
Finishing Line (EU-03)	Finishing Line Material Usage & SDS	Gallons	Monthly
Residuals Conveying (EU-04)	Conveying System A	Hours of Operation	Per Shift
Residuals Conveying (EU-05)	Conveying System B	Hours of Operation	Per Shift
Road Emissions (EU-07)	Unpaved Road Emissions	VMT*	Annual
West Fuel Cell (EU-08)	Wood Fuel Used	Tons	Weekly
Hogged Fuel Pile (EU-09)	Bone Dry Tons stored	BDT	Monthly
Putty Patching (EU-10)	Material Usage	Gallons	Monthly

* VMT may be estimated based on previous year VMT ratio to production.

32.b. The permittee must determine compliance with the PSELs, except GHGs by calculating annual emissions for each emissions units using in the following formula, the process parameters measured in Condition 32.a, and the emission factors listed in 36.c.

$$E = \sum P_{eu} \times Ef_{eu} \times K$$

E = pollutant emissions (tons/yr);
 P_{eu} = process parameter identified in Condition 32;
 Ef_{eu} = emission factor identified for each emissions unit and pollutant in Condition 32; and
 K = conversion constant (1 ton/2000 lbs for annual emissions calculations).

32.c. The emission factors to be used in Condition 32.a for calculating the annual emissions to demonstrate compliance with the PSEL are displayed in Condition 33 below.

33. The permittee must use the following emission factors to estimate emissions in accordance with Condition 32:
[LRAPA 35-0160]

Emissions Unit(s)	Pollutant	Process Parameters	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Test Method	Frequency
Veneer Dryers (EU-01) and East Fuel Cell (EU-01A)	PM/ PM ₁₀	Veneer Dried	0.423	lb/msf (3/8")	No	ODEQ Method 7	NA
	PM _{2.5}	Veneer Dried	0.106	lb/msf (3/8")	No	N/A	N/A
	CO	Veneer Dried	1.77	lb/msf (3/8")	No	EPA Method 10	NA
	NO _x	Veneer Dried	0.406	lb/msf (3/8")	No	EPA Method 7E	NA
	SO ₂	Wood Combustion	0.22	lb/TON	No	NA	NA
	VOC	Veneer Dried	0.5561	lb/msf (3/8")	Yes	EPA Method 25A for VOC and Method 320, NCASI Method CI/WP-98.01, NCASI Method IM/CAN/WP-99.02, or NCASI Method ISS/FP-A105.01 for formaldehyde and methanol	Once/term
Plywood Presses (EU-02)	PM/ PM ₁₀	Square Feet Pressed	0.011	lb/msf (3/8")	No	NA	NA
	PM _{2.5}	Square Feet Pressed	0.01	lb/msf (3/8")	No	NA	NA
	VOC	Square Feet Pressed	0.1027	lb/msf (3/8")	Yes	EPA Method for VOC and Method 320, NCASI Method CI/WP-98.01, NCASI Method IM/CAN/WP-99.02, or NCASI Method ISS/FP-A105.01 for formaldehyde and methanol	Once/term
Finishing Line (EU-03)	VOC	Annual Emissions	3	tons/yr	No	Mass Balance	NA
Wood Residuals Conveying A (EU-04)	PM/ PM ₁₀ / PM _{2.5}	Msf (3/8")	0.012	lb/msf (3/8")	No	ODEQ Method 8	NA
	VOC	Msf (3/8")	0.014	lb/msf (3/8")	No	NA	NA
Wood Residuals Conveying B (EU-05)	PM	Hours, 7,850 acfm	0.01	gr/scf	No	NA	NA
	PM ₁₀	Hours, 7,850 acfm	0.01	gr/scf	No	NA	NA
	PM _{2.5}	Hours, 7,850 acfm	0.01	gr/scf	No	NA	NA
Roads (EU-07)	PM	VMT Employees	0.385	lbs/VMT	No	NA	NA
		VMT Shipping	4.385	lbs/VMT	No	NA	NA
	PM ₁₀	VMT Employees	0.003	lbs/VMT	No	NA	NA
		VMT Shipping	0.26	lbs/VMT	No	NA	NA
	PM _{2.50}	VMT Employees	0.003	lbs/VMT	No	NA	NA
		VMT Shipping	0.26	lbs/VMT	No	NA	NA
West Fuel Cell	PM/ PM ₁₀	Wood Combusted	0.39	lb/ton	No	NA	NA

Emissions Unit(s) (EU-08)	Pollutant	Process Parameters	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Test Method	Frequency
EU-08	PM _{2.5}	Wood Combusted	0.35	lb/ton	No	NA	NA
	CO	Wood Combusted	17.2	lb/ton	No	EPA Method 10	NA
	NO _x	Wood Combusted	6.1	lb/ton	No	EPA Method 7E	NA
	SO ₂	Wood Combusted	0.22	lb/ton	No	NA	NA
	VOC	Wood Combusted	1.2	lb/ton	No	NA	NA
Hogged Fuel Pile (EU-09)	PM/ PM ₁₀	Material Moved	0.24	lb/ton	No	NA	NA
	PM _{2.5}	Material Moved	0.036	lb/ton	No	NA	NA
	VOC	Material Moved	0.33	lb/ton	No	NA	NA
Putty Patching (EU-10)	VOC	Material Usage	0.0	lb VOC/gal Putty	No	SDS	NA
Aggregate Insignificant (EU-AGG)	PM/ PM ₁₀ / PM _{2.5}	Annual Emissions	1	Ton/year	No	NA	NA
	VOC	Annual Emissions	1	Ton/year	No	NA	NA
	NO _x	Annual Emissions	1	Ton/year	No	NA	NA
	CO	Annual Emissions	1	Ton/year	No	NA	NA

34. The emissions factors listed in Condition 33 and 36.a are not enforceable limits unless otherwise specified in this permit. Compliance with PSELS must be determined by the calculations contained in Condition 32.a of this permit using the monitored parameters (34.a) recorded during the reporting period and the emission factors contained in Condition 33 and 36.a . [OAR 340-218-0040(4)]

SYNTHETIC MINOR HAP REQUIREMENTS:

35. In accordance with Condition 19, the permittee must limit facility-wide emissions of hazardous air pollutants (HAP) exceed nine (9) tons per year of any single HAP and/or 24 tons per year of combined HAPs. [LRAPA 42-0060]

Synthetic Minor HAP Monitoring [OAR 340-218-0050(3)(a)]

36. To demonstrate compliance with the synthetic minor HAP emission limits the permittee must determine the actual HAP emissions emitted during each 12-month period by calculating the individual and total HAP emissions using the following formula by the end of the following month for each period. The permittee must maintain records of the emission calculations, results, and comparison to the HAP limits.

$$E = \sum P_{eu} \times E_{feu} \times K$$

E = pollutant emissions (tons/yr);
 P_{eu} = process parameter identified in Condition 36.a;
 E_{feu} = emission factor identified for each emissions unit and pollutant in Condition 36.a; and
 K = conversion constant (1 ton/2000 lbs for annual emissions calculations).

36.a. The emission factors that are to be used to demonstrate compliance with the synthetic minor HAP emission limits are provided in the following table:

HAP Emission Factors for Determining Synthetic Minor HAP Compliance

Pollutant	Process/Device	Emission Factor	Units
Single HAP (Methanol)	Fuel Cells (EU-01A and EU-08)	0.066	lb/BDT
	Presses (EU-02)	0.022	lb/Msf -3/8" plywood
	Veneer Dryers (EU-01)	0.052	lb/Msf -3/8" veneer
Combined HAP	Fuel Cells (EU-01A and EU-08)	0.850	lb/BDT
	Presses (EU-02)	0.025	lb/Msf -3/8" plywood
	Veneer Dryers (EU-01)	0.166	lb/Msf -3/8" veneer

AREA SOURCE NESHAP REQUIREMENTS

37. Area Source Boiler NESHAP: Industrial, Commercial, and Institutional Boilers Area Source NESHAP for West Fuel Cell (EU-08) [40 CFR 63 Subpart JJJJJJ]
- 37.a. The permittee may only burn *clean cellulosic biomass* as defined in 40 CFR 241.3 in EU-08. *Clean cellulosic biomass* means those residuals that are akin to traditional cellulosic biomass, including, but not limited to:
- 37.a.i. Agricultural and forest-derived biomass (e.g., green wood, forest thinnings, clean and unadulterated bark, sawdust, trim, tree harvesting residuals from logging and sawmill materials, hogged fuel, wood pellets, untreated wood pallets); urban wood (e.g., tree trimmings, stumps, and related forest-derived biomass from urban settings); corn stover and other biomass crops used specifically for the production of cellulosic biofuels (e.g., energy cane, other fast growing grasses, byproducts of ethanol natural fermentation processes); bagasse and other crop residues (e.g., peanut shells, vines, orchard trees, hulls, seeds, spent grains, cotton byproducts, corn and peanut production residues, rice milling and grain elevator operation residues); wood collected from forest fire clearance activities, trees and clean wood found in disaster debris, clean biomass from land clearing operations, and clean construction and demolition wood. These fuels are not secondary materials or solid wastes unless discarded. Clean biomass is biomass that does not contain contaminants at concentrations not normally associated with virgin biomass materials.
- 37.b. The permittee must conduct a tune-up of the boiler (West Fuel Cell (EU-08)) biennially to demonstrate continuous compliance as specified in paragraphs 37.b.i through 37.b.vii of this section. [40 CFR 63.11196(a)(1), 63.11201(b), 63.11214(b) and 40 CFR 63.11223]
- 37.b.i. Inspect the burner and clean or replace any components of the burner as necessary. The burner inspection may be delayed until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection;
 - 37.b.ii. Inspect the flame pattern and adjust the burner as necessary to optimize the flame pattern. Any adjustment must be consistent with the manufacturer's specifications for the burner, if available;
 - 37.b.iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly. The inspection of the system controlling the air-to-fuel ratio may be delayed until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection;
 - 37.b.iv. Optimize total emissions of CO. This optimization must be consistent with the manufacturer's specifications, if available;
 - 37.b.v. 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;
 - 37.b.vi. Maintain onsite and submit, with the annual report specified in Condition 48.b a biennial report containing the following information;

- (1) The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured before and after the tune-up.
 - (2) A description of any corrective actions taken as a part of the tune-up.
 - (3) The type and amount of fuel used over the 12 months prior to the biennial tune-up.
- 37.b.vii. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.
- 37.c. NESHAP Reporting. The permittee must prepare, by March 15 of each year, and submit to LRAPA biennially, an annual compliance certification report for the previous calendar year containing the following information. The permittee must submit the report by March 15 if there were any instances described by Condition 41.c.iii. [40 CFR 63.11225(b)(1)-(3)]
 - 37.c.i. Company name and address.
 - 37.c.ii. Statement by a responsible official, with the official's name, title, phone number, email address, and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all the relevant standards and other requirements of the NESHAP. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
 - (1) "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up, as applicable, of each boiler."
 - (2) For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: "No secondary materials that are solid waste were combusted in any affected unit."
 - (3) "This facility complies with the requirement in 40 CFR 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available."
 - 37.c.iii. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 37.d. NESHAP Recordkeeping. The permittee must keep records to document conformance with the work practices, emission reduction measures, and management practices as follows: [40 CFR 63.11225(c)(2)(i), (iii), (v), (vi), (4), (5)]
 - 37.d.i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - 37.d.ii. For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report.
 - 37.d.iii. For each boiler that meets the definition of seasonal boiler, the permittee must keep records of days of operation per year.
 - 37.d.iv. For each boiler that meets the definition of limited-use boiler, the permittee must keep a copy of the federally enforceable permit that limits the annual capacity factor to less than or equal to 10 percent and records of fuel use for the days the boiler is operating.
 - 37.d.v. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
 - 37.d.vi. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual operation.
- 37.e. 40 CFR Part 63 General Provisions according to Table 8 of Subpart JJJJJ, incorporated by reference. [40 CFR 63.11235]

RECORDKEEPING REQUIREMENTS [OAR 340-218-0050(3)(b)]

38. The permittee must maintain the following general records of required monitoring information:
 - a. Date, place as defined in the permit, and time of sampling or measurements;
 - b. Date(s) analyses were performed;
 - c. Company or entity that performed the analyses;
 - d. Analytical techniques or methods used;
 - e. Results of such analyses;
 - f. Operating conditions as existing at the time of sampling or measurement; and
 - g. Records of quality assurance in accordance with the manufacturer's written specifications for continuous monitoring systems (including but not limited to quality control activities, audits, and calibrations drift checks).

39. The permittee must maintain the following specific records of required monitoring information:
 - a. Weekly/monthly (as appropriate) facility fugitive emissions inspection, maintenance, and corrective action log;
 - b. Visible emissions tests and surveys;
 - c. Pollution control device(s) inspection, maintenance, and repair log;
 - d. Average daily and annual fuel usage (tons);
 - e. Daily and Annual square feet dried in Veneer Dryers (EU-01) (square feet (3/8"));
 - f. Estimated monthly storage pile surface dimensions;
 - g. Daily and Annual veneer dryer throughput (MSF - 3/8" basis);
 - h. Daily and Annual records of redry veneer processed (MSF - 3/8" basis);
 - i. Daily and Annual press plywood throughput (MSF - 3/8" basis);
 - j. Monthly and annual resin usage (pounds);
 - k. Excess emissions log;
 - l. PSEL 12-month rolling pollutant emissions for the entire facility (tons/year);
 - m. Monthly and annual coating, putty and patching compound and solvent usage (gals or lbs), VOC content (wt. %), and density (lb/gal or lb/lb); and

40. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. [LRAPA 34-016 and OAR 340-218-0050(b)(B)].

REPORTING REQUIREMENTS

General Reporting Requirements

41. Excess Emissions Reporting The permittee must report all excess emissions as follows: [LRAPA Title 36]
 - 41.a. Immediately (within 1 hour of the event) notify LRAPA of an excess emission event by phone, e-mail, or facsimile; and [LRAPA 36-005(3)(a)]
 - 41.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025(1)]
 - 41.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;
 - 41.b.ii. The date and time the owner or operator notified LRAPA of the event;
 - 41.b.iii. The equipment involved;
 - 41.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;

- 41.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
 - 41.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);
 - 41.b.vii. The final resolution of the cause of the excess emissions; and
 - 41.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to 36-040.
- 41.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.
- 41.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 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.
- 41.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.
- 41.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025-3. However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
42. **Permit Deviations Reporting:** The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with Condition 41. [OAR 340-218-0050(3)(c)(B)]
43. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
44. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
45. **Greenhouse Gas Registration and Reporting:** If the calendar year emission rate of greenhouse gases (CO₂e) is greater than or equal to 2,756 tons (2,500 metric tons including both biogenic and anthropogenic), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5). [OAR 340-215-0040]

Semi-annual and Annual Reports

46. The permittee must submit three (3) copies of the semi-annual monitoring report covering the period January 1 to June 30, using LRAPA-approved forms, **by August 30**, unless otherwise approved in writing by LRAPA. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to the EPA. The semi-annual monitoring report must include the semi-annual compliance certification. [OAR 340-218-0050(3)(c)(A) and OAR 340-218-0080(6)(d)]
47. 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 15**. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to the EPA. [OAR 340-218-0080]

48. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by LRAPA. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the LRAPA office. 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)]
- 48.a. **The first semi-annual report is due on August 30**, and must include the semi-annual compliance certification, OAR 340-218-0080.
- 48.b. **The annual report is due on March 15** and must consist of the following:
- 48.b.i. the emission fee report; [OAR 340-220-0100]
 - 48.b.ii. a summary of the excess emissions upset log; [LRAPA 36-025]
 - 48.b.iii. the second semi-annual compliance certification; and [OAR 340-218-0080]
 - 48.b.iv. the annual certification that the risk management plan is being properly implemented (LRAPA 44-0160). [OAR 340-218-0080(7)]
 - 48.b.v. An annual summary to document compliance with Condition 32 must be submitted for each year. This information will be used to determine compliance with the annual (12-month rolling) PSELs. [LRAPA 35-160]
 - 48.b.vi. The annual report must also include annual greenhouse gas emissions in accordance with Condition 45. [340-215-0010(2) and 340-215-0040]
 - 48.b.vii. Biennial Boiler NESHAP Tune-up report.
49. 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)]
- 49.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 49.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: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* 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;
 - 49.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 49.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12, occurred; and
 - 49.d. Such other facts as LRAPA may require to determine the compliance status of the source.
50. 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)]
51. The regulatory agencies addresses are as follows, unless otherwise instructed:

Springfield, OR 97477

1200 Sixth Avenue, Suite 155
Seattle, WA 98101

Non-Applicable Requirements

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

Rule citation	Summary	Reason for not being applicable
40 CFR Part 60 Subpart Dc	NSPS for Small Steam Generating Units	The fuel cells were installed prior to the June 9, 1989 applicability date.
40 CFR Part 63 Subpart DDDD	Plywood and Composite Wood Products NESHAP (major sources)	The permittee obtained synthetic minor HAP restrictions prior to the compliance date.
40 CFR Part 63 Subpart DDDDD	Major Source Boiler and Process Heater NESHAP	The permittee obtained synthetic minor HAP restrictions prior to the compliance date.

Max/cmw
3/18/19

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; April 16, 2015 - State Implementation Plan Volume 3, 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 49-040] This condition is enforceable only by LRAPA.

G6. Credible Evidence

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G7. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(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. Open Burning [LRAPA Title 47]

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

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0200 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee must comply with OAR 340-248-0200 through 340-248-0280, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

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

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

- a. Compliance with the conditions of the permit must be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. such applicable requirements are included and are specifically identified in the permit, or
 - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit must alter or affect the following:
 - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. the applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or
 - iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

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

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

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

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

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

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

- a. The permittee must monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and
 - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in LRAPA Title 12.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to LRAPA and the EPA.
- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 must not extend to off-permit changes.

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

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

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

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

- a. Legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. Sale or exchange of the activity or facility.

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

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

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

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

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

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

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

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

G21. New Source Review Modification [LRAPA Title 38]

No permittee must construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010) and having satisfied the requirements of LRAPA Title 38.

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 340-218-020]

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

G25. Severability Clause [OAR 340-218-0050(5)]

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

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

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

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

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

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

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

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

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

Murphy Company
Prairie Road Panelboard Plant

Permit number: 203102
Expiration Date: [5 years from issuance]
Page 26 of 26

ALL INQUIRIES SHOULD BE DIRECTED TO:

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