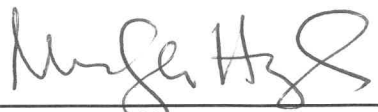
LANE REGIONAL AIR PROTECTION AGENCY
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056

STANDARD AIR CONTAMINANT DISCHARGE PERMIT

Issued in accordance with provisions of Title 34, Lane Regional Air Protection Agency's Rules and Regulations, and based on the land use compatibility findings included in the permit record.

Issued To: **Emerald Forest Products, Inc.** **Plant #1** 118 Highway 99 North Eugene, Oregon 97402	Information Relied Upon: Application No. 60541 Dated: 06/23/2015 Revised Application No. 65189 Dated 5/17/2019 Land Use Compatibility Statement: From: City of Eugene Dated: April 18, 1999
Mailing Address: P.O. Box 2746 Eugene, OR 97402	Fee Basis (Title 37, Table1): Title 37, Table 1: Part B: 57 Plywood Manufacturing and/or Veneer Drying Title 37, Table 1: Part C: 3 Sources electing to maintain the source's netting basis Title 37, Table1 Part C: 6 Sources having the potential to emit more than 10 tons or more of a single HAP per year Title 37, Table 1: Part C: 7 Sources having the potential to emit more than 25 tons or more of all HAPS combined in a year
Permit Number: 202528 Permit Type: Standard SIC: 2436 Veneer Drying & Plywood Manufacturing 4961 Fuel-burning Equipment Date Renewed: July 11, 2019 Expiration Date: July 11, 2024	Permitted Sources: Pneumatic Transfer System with Cyclone, Baghouses (2) and Target Boxes (2) 1 Steam-heated Veneer Dryer with Burley Scrubber 1 Gas-fired Veneer Dryer with Burley Scrubber 5 Plywood Presses 1 Gas-fired w/Diesel-Backup Boiler (Subject to 40 CFR 60 Subpart Dc)

Issued By:



Merlyn L. Hough, Director

Effective Date:

JUL 11 2019

Permitted Activities

1. Until such time as this permit expires, is modified, or revoked, the permittee is allowed to discharge air 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 and Pollution Control Device Identification

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

Emission Unit I.D.	Emission Unit Description	Control Equipment
EU-PXFRSYS	Pneumatic Transfer System (for all sawdust, hog trim, Target Boxes/Chip Bin)	1 Cyclone & 2 Baghouses
EU-NGVDRY#1	1 Natural Gas-fired Veneer Dryer #1	Burley Scrubber #1
EU-STVDRY#2	1 Steam-heated Veneer Dryer #2	Burley Scrubber #2
EU-PLYPRS(5)	5 Plywood Presses	Uncontrolled
EU-PLYMISC	Miscellaneous Plywood Activities including the plywood and veneer trim & saws	Uncontrolled
EU-BOILER	1 Natural Gas or Diesel-fired Boiler (42.87 MMBtu/hr)	Uncontrolled

Performance Standards and Emission Limitations

Plant Site Emission Limits (PSELs)

3. Emissions from the plant site must not exceed the annual (12-month rolling) limits below. Any changes in operation that might increase emissions above the following PSELs must be approved by LRAPA. [LRAPA 42-0035 42-0041, and 42-0060]

Annual (12-month rolling) PSEL
(tons/year)

	PM	PM_{10}	$PM_{2.5}$	SO_2	NO_X	CO	VOC	Single HAP	Combined HAPs	GHG
PSEL	34	32	9	39	39	99	99	9	24	74,000

The permittee must monitor compliance with the permit limits by keeping records required by Condition 21 and calculating a new 12-month total for each pollutant by the 15th working day of each month as specified in Condition 22.

Veneer and Plywood Manufacturing Standards and Emission Limitations

4. Particulate matter emissions from the veneer dryers, EU-NGVDRY#1 and EU-STDRY#2, must be controlled by Burley scrubbers at all times when the dryers are operating. [33-060(3)(a)(A)]

5. The permittee must not operate the veneer dryers, EU-NGVDRY#1 and EU-STDRY#2, such that visible air contaminants emitted from any dryer stack or emission point exceeds: [LRAPA 33-060(3)(a)(B)]

    5.a. A daily average operating opacity of 10% (as measured by EPA Method 9) on more than two days within any 12-month period, with the days separated from each other by at least 30 days; and [LRAPA 33-060(3)(a)(B)(i)]

    5.b. A maximum opacity of 20% at any time as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(ii)]

6. The veneer dryers, EU-NGVDRY#1 and EU-STDRY#2, must be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment (Burley scrubbers) must be at full efficiency and effectiveness so that the emissions of air contaminants are kept at the lowest practicable levels. [LRAPA 33-060(3)(a)(E)]

7. The permittee must not willfully cause or permit the installation or use of any means, such as dilution, which without resulting in a reduction of the total amount of air contaminants emitted, conceals emissions. [LRAPA 33-060(3)(a)(F)]

8. Where the permittee has not taken effective measures to minimize emissions, LRAPA may require that the equipment or structures in which processing, handling and storage are done be tightly enclosed, modified, or operated in such a way that air contaminants are minimized, controlled, or removed before discharge to the air. [LRAPA 33-060(3)(a)(G)]

9. The permittee must not cause to be emitted particulate matter from veneer and plywood mill sources (except veneer dryers, fuel-burning equipment, and refuse-burning equipment), including but not limited to, sanding machines, saws, presses, barkers, hogs, chippers and other material size reduction equipment, process or space ventilation systems, and truck loading and unloading facilities in excess of a total from all sources within the plant site of an hourly average emission rate (pounds per hour) 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 or veneer 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)&(c)]

    9.a. The permittee must demonstrate compliance with Condition 9 by performing the calculations required in Condition 22 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)(b)]

10. Processes controlled by Burley Scrubbers (EU-NGVDRY#1 and EU-STDRY#2), cyclone and baghouses (EU-PXFRSYS) must <u>not</u> be operated without the control devices online and functioning properly. The Burley Scrubbers, cyclone and baghouses must be operated at all times at the highest reasonable efficiency and effectiveness to minimize emissions. [LRAPA 32-007(1)(a)]

11. The permittee must perform operation and maintenance (O&M), and work practice standards for the veneer dryers (EU-NGVDRY#1 and EU-STDRY#2), Burley scrubbers, cyclone, and baghouses and maintain records as required per permit Condition 21. [LRAPA 32-007(1)(b)] The O&M plan and work practice standards must be maintained on site and must be made available for inspection upon request by LRAPA. [LRAPA 32-007]

Boiler: EU-Boiler Standards and Emission Limitations

12. The permittee must not cause, suffer, allow, or permit particulate matter emissions from the boiler (EU-BOILER (installed in 1994)) in excess of the following: [LRAPA 32-030(1)]

    12.a. 0.10 grains per dry standard cubic foot corrected to 50 percent excess air provided that all representative compliance source test results prior to April 16, 2015 demonstrate emissions no greater than 0.080 grains per dry standard cubic foot; or

    12.b. If any representative compliance source test results collected prior to April 16, 2015 demonstrate emissions greater than 0.080 grains per dry standard cubic foot, or if there are no representative compliance source test results, then 0.14 grains per dry standard cubic foot. [LRAPA 32-030(1)(a), (1)(b) &(3)(b)]

New Source Performance Standards (NSPS): 40 CFR Part 60 - Subpart Dc

13. The permittee must comply with the New Source Performance Standards (NSPS) for Small Industrial-Commercial-Institutional Steam Generating Units (40 CFR Part 60 Subpart Dc (§§60.40c & 60.48c), which applies to the Cleaver Brooks 42.87 MM Btu/hr Natural Gas boiler (EU-BOILER with diesel backup). The requirements of this rule include, but may not be limited to, record keeping of fuel usage and semi-annual reporting for periods during which oil is burned in accordance with §60.48c. [40 CFR 60.40c & LRAPA 46-535(3)(e)]

14. If distillate oil is combusted in EU-BOILER, the permittee must not cause to be discharged into the atmosphere any gases that exhibit greater than 20% opacity as a 6-minute average, except for one 6-minute period per hour of not more than 27% opacity. The opacity standard applies at all times except during periods of startup, shutdown or malfunction. [40 CFR 60.43c(c)] Monitoring and compliance with this visible emission limit must be conducted as specified in Conditions 14.a - 14.d as follows:

    14.a. **Visible Emissions Monitoring:** Visible emissions must be measured and recorded with a continuous opacity monitoring system (COMS) installed, operated, and maintained in accordance with 40 CFR 60.13 and 60.47c(a) and (b).

    14.b. The permittee is not required to operate a COMS provided the boiler burns only gaseous fuels and/or fuel oils that contain no greater than 0.5 weight percent sulfur, and the permittee operates the unit according to a written site-specific monitoring plan approved by LRAPA.

        14.b.i. This monitoring plan must include procedures and criteria for establishing and monitoring specific parameters for the affected facility indicative of compliance with the opacity standard.

        14.b.ii. For testing performed as part of this site-specific monitoring plan, the permitting authority may require as an alternative to the notification and reporting requirements specified in 40 CFR 60.8 and 60.11 that the permittee submit any deviations with the excess emissions report required under 40 CFR 60.48c(c).

    14.c. **Initial Performance Test:** If not required to use a COMS due to Condition14.b, the permittee must conduct an initial performance test using EPA Method 9 and the procedures in 40 CFR 60.11 to demonstrate compliance with Condition 14. (The Initial Performance test was conducted March 28, 2002.) Subsequent/On-going Visible Emissions monitoring must be conducted by July 31, 2019, or during the next firing of the boiler on diesel fuel, whichever occurs later. The observation period for EPA Method 9 performance tests may be reduced from 3 hours to 60 minutes if all 6-minute averages are less than 10 percent and all individual 15-second observations are less than or equal to 20 percent during the initial 60 minutes of observation.

14.d. **Ongoing Visible Emissions Monitoring**: The permittee must conduct subsequent EPA Method 9 performance tests using the procedures in Condition 14.c according to the applicable schedule as follows and as determined by the most recent EPA Method 9 performance test results:

14.d.i. If no visible emissions are observed, a subsequent EPA Method 9 performance test must be completed within 12 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;

14.d.ii. If visible emissions are observed but the maximum 6-minute average opacity is less than or equal to 5 percent, a subsequent EPA Method 9 performance test must be completed within 6 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later;

14.d.iii. If the maximum 6-minute average opacity is greater than 5 percent but less than or equal to 10 percent, a subsequent EPA Method 9 performance test must be completed within 3 calendar months from the date that the most recent performance test was conducted or within 45 days of the next day that fuel with an opacity standard is combusted, whichever is later; or

14.d.iv. If the maximum 6-minute average opacity is greater than 10 percent, a subsequent EPA Method 9 performance test must be completed within 45 calendar days from the date that the most recent performance test was conducted.

14.d.v. If the maximum 6-minute opacity is less than 10 percent during the most recent Method 9 performance test, the permittee may, as an alternative to performing subsequent Method 9 performance tests, elect to perform subsequent monitoring using EPA Method 22 according to the procedures specified in paragraphs (a)(2)(i) and (ii) of 40 CFR 60.47c.

14.e. **Opacity Testing and Reporting**: For EU-BOILER which is subject to the opacity standard in Condition 14, the permittee must conduct an initial performance test (completed March 28, 2002) in accordance with 40 CFR 60.45c(a)(8) and must conduct subsequent performance tests in accordance with the schedule specified in Conditions 14.c and 14.d to determine compliance with the opacity standard. The permittee must submit to LRAPA the performance test data from subsequent performance tests.

14.f. **Excess Emissions Reporting and Performance Tests Recordkeeping**: For EU-BOILER, the permittee must submit excess emissions reports for any excess emissions that occur during the reporting period and maintain records according to the following requirements, as applicable to the visible emissions monitoring method used.

14.f.i. For each performance test conducted using EPA Method 9, the permittee must keep the following records:

14.f.i.A. Dates and time intervals of all opacity observation periods;

14.f.i.B. Name and affiliation, and copy of current visible emission reading certification for each visible emission observer participating in the performance test; and

14.f.i.C. Copies of all visible emission observer opacity field data sheets.

14.f.ii. For each performance test conducted using EPA Method 22, the permittee must keep the following records:

14.f.ii.A. Dates and time intervals of all visible emissions observation periods;

14.f.ii.B. Name and affiliation for each visible emission observer participating in the performance test;

14.f.ii.C. Copies of all visible emission opacity field data sheets; and

14.f.ii.D. Documentation of any adjustments made and the time the adjustments were completed to the affected facility operation by the permittee to demonstrate compliance with the applicable monitoring requirements.

14.f.iii. For each digital opacity compliance system, the permittee must maintain records and

submit reports in accordance with the requirements specified in the site-specific monitoring plan approved by LRAPA.

15. The permittee must not combust distillate oil in EU-BOILER that contains greater than 0.5 percent sulfur by weight [40 CFR 60.42c(d) & LRAPA 32-065 (2)(b)] and the permittee must keep records and submit semi-annual reports for periods for which oil was burned that include the following information:[40 CFR 60.48c(d), (e), (f), (i) and (j)]

    15.a. Records of fuel supplier certifications:
        15.a.i. For distillate oil:
            15.a.i.A. The name of the oil supplier;
            15.a.i.B. A statement from the oil supplier that the oil company complies with the specifications under the definition of distillate oil in 40 CFR 60.41c; and
            15.a.i.C. The sulfur content or maximum sulfur content in the oil.
    15.b. All reports must be submitted to LRAPA in accordance with Conditions 25 and 26;
    15.c. All records required by this condition must be maintained by the permittee for a period of two (2) years following the date of such record;
    15.d. In addition to records of fuel supplier certifications, the report must include a certified statement signed by the permittee that the records of fuel supplier certifications submitted represent all of the fuel combusted in EU-Boiler during the reporting period.

National Emission Standards for Hazardous Air Pollutants (NESHAPs): Subpart JJJJJJ

16. The permittee must comply with the National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boiler Area Sources [40 CFR 63 Subpart 6J] definition of a gas-fired boiler [60 CFR 63.11237], to be exempt from NESHAP Subpart 6J requirements. The permittee must:

    16.a. Operate the boiler (EU-Boiler) such that distillate oil is burned only during periods of gas curtailment, gas supply interruption, startups, or for periodic testing, maintenance, or operator training. Periodic testing, maintenance, or operator training on distillate oil in EU-Boiler must not exceed a combined total of **48 hours** during any calendar year.
    16.b. Maintain annual records of elapsed time (in hours) of combustion of distillate oil in EU-Boiler for 5 years as specified in Condition 21, Item R.

General Emission Limitations

17. The permittee must not cause or allow to be emitted any visible emissions, excluding uncombined water, from any emission point in EU-PXFRSYS that equal or exceed an average opacity of 20 percent for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(2) & (3)]

18. The permittee must comply with the following particulate matter emission limits for sources other than fuel burning equipment, refuse burning equipment, and fugitive emissions sources, (EU-PXFRSYS, EU-NGVDRY#1, EU-STVDRY#2): [LRAPA 32-015(2)]

    18.a. Particulate emissions must not exceed 0.14 grains per dry standard cubic foot (dscf) from any air contaminant source constructed or modified after June 1, 1970 but prior to April 16, 2015 (EU-PXFRSYS, EU-NGVDRY#1, EU-STVDRY#2) and for which there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]

19. The permittee must take reasonable precautions to prevent fugitive dust emissions from leaving the property of a source for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions must be measured by EPA method 22 with the minimum observation time of at least six minutes. Reasonable precautions include: [LRAPA 48-015(1)(a) through (g)]

19.a. Using, where possible, 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;
19.b. Applying water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
19.c. Enclosing (full or partial) material stockpiles in cases where application of water or other suitable chemicals is not sufficient to prevent particulate matter from becoming airborne;
19.d. Installing and using of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
19.e. Installing adequate containment during sandblasting or other similar operations;
19.f. Covering, at all times when in motion, open-bodied trucks transporting materials likely to become airborne;
19.g. Promptly removing from paved streets of earth or other material which does or may become airborne from paved streets.

For purposes of this Condition 19.a-g, fugitive particulate emissions are visual emissions that leave the permittee's property for a period or periods totaling more than 18 seconds in a six-minute period. Fugitive emissions are determined by EPA Method 22 at the downwind property boundary. [LRAPA 48-015(2)(a)&(b)]

Monitoring and Recordkeeping Requirements

20. Upset conditions or breakdown of equipment or air pollution control equipment which may result in exceeding the emission limitations specified in this permit must be reported to LRAPA as soon as possible in accordance with Condition G12. [LRAPA Title 36]

21. The permittee must maintain records of the following information at the plant site for a period of five (5) years following the date of data entry. Records must be available for inspection by authorized representatives of LRAPA. All totals for items A, B, E, F, I, L, M, N, and O must be 12-month rolling totals: [LRAPA 34-016, 40 CFR Part 60, Subpart Dc, and 40 CFR Part 63, Subpart JJJJJJ]

Item	Emission Source, Unit, Control Device	Permit Condition #	Process Parameter (units)	Minimum Monitoring & Recording Frequency
A	Facility-Wide Annual (12-month rolling) PSEL	3	Rolling 12-month PSEL Compliance Demonstration	By the 15th of each Month in accordance with Condition 22
B	EU-PXFSYS	3	Bone Dry Tons (BDT) total throughput	Monthly
C	EU-PXFSYS Cyclone & Baghouses (2)	10 & 11	Visual inspection and maintenance of cyclone and baghouses (2)	As performed
D	EU-PXFSYS Baghouses	10 & 11	Pressure drop readings on baghouse gauges	Weekly
E	EU-NGVDRY#1	3	1000 square feet (3/8-inch basis)	Monthly
F	EU-NGVDRY#1	3	Cubic feet of Natural Gas	Monthly
G	EU-NGVDRY#1 Scrubber	10 & 11	Water flow return readings on Burley	Weekly

Item	Emission Source, Unit, Control Device	Permit Condition #	Process Parameter (units)	Minimum Monitoring & Recording Frequency
			scrubber gauge and opacity	
H	EU-NGVDRY#1 & Scrubber	10 & 11	Dryer and scrubber maintenance	As performed
I	EU-STVDRY#2	3	1000 square feet (3/8-inch basis)	Monthly
J	EU-STVDRY#2 Scrubber	10 & 11	Water flow return readings on Burley scrubber gauge and opacity	Weekly
K	EU-STVDRY#2 & Scrubber	10 & 11	Dryer and scrubber maintenance	As performed
L	EU-PLYPRS (5)	3	Total Production 1000 square feet (3/8-inch basis)	Monthly
M	EU-PLYMISC	3	1000 square feet (3/8-inch basis) throughput to chippers & saws	Monthly
N	EU-Boiler	3	Cubic feet of Natural Gas Combusted	Monthly
O	EU-Boiler on #2 oil	3	Gallons	Monthly
P	EU-Boiler on #2 oil	14.c & 14.d	Opacity	Per required VE test on #2 oil
Q	EU-Boiler on #2 oil	15	Certification of Sulfur Content in No. 2 oil	Each delivery
R	EU-Boiler on #2 oil	16.b	Elapsed time (in hours) of combustion of No. 2 oil	Per occurrence of #2 oil combustion

22. Compliance with the PSELs and HAP limitations in Condition 3 are determined for each 12-month rolling period based on the following calculation for each pollutant, except for GHGs (for GHG emissions see Condition below 25.e): [LRAPA 34-016]

$E = \Sigma(EF \times F)/2000 + \text{Constant (for PM, } PM_{10} \text{ and } PM_{2.5} \text{ for EU-PXFRSYS only)}$

where,

E = pollutant emissions (tons/year);

Σ = symbol representing “summation of”;

EF = pollutant emission factor (see Condition 23);

F = fuel combustion or material throughput (see Condition 21;)

Constant = for PM add 0.8 tons/year, for PM_{10} add 0.7 tons per year and for $PM_{2.5}$ add 0.4 tons/year for EU-PXFRSYS only.

23. The permittee must use the following emission factors for calculating pollutant emissions, unless alternative emission factors are approved by LRAPA. The permittee may request or LRAPA may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved

by LRAPA. [LRAPA 42-0080]

Emission Unit	Pollutant	Emission Factor (EF)	EF Units	EF Verification &/or Source Testing
EU-PXFRSYS	$PM/PM_{10}/PM_{2.5}$	0.001	lb/BDT	No
Target Box	$PM/PM_{10}/PM_{2.5}$	0.1/0.085/0.05	lb/BDT	No
EU-NGVDRY#1 Combined EFs for Heating & Cooling Zones and Fugitives	$PM/PM_{10}/PM_{2.5}$	0.29 /0.28 /0.07	lb/1000 ft.^{2} (3/8" basis)	No
	NO_x	0.12	lb/1000 ft.^{2} (3/8" basis)	No
	CO	0.02	lb/1000 ft.^{2} (3/8" basis)	No
	VOC	0.71	lb/1000 ft.^{2} (3/8" basis)	Yes
	Acetaldehyde	0.068	lb/1000 ft.^{2} (3/8" basis)	No
	Acrolein	0.009	lb/1000 ft.^{2} (3/8" basis)	No
	Benzene	0.0057	lb/1000 ft.^{2} (3/8" basis)	No
	Formaldehyde	0.030	lb/1000 ft.^{2} (3/8" basis)	Yes
	Methanol	0.031	lb/1000 ft.^{2} (3/8" basis)	Yes
	Phenol	0.026	lb/1000 ft.^{2} (3/8" basis)	No
	Propionaldehyde	0.0036	lb/1000 ft.^{2} (3/8" basis)	No
	Toluene	0.0074	lb/1000 ft.^{2} (3/8" basis)	No
	m,p-xylene	0.0039	lb/1000 ft.^{2} (3/8" basis)	No
	Aggregate HAP	0.185	lb/1000 ft.^{2} (3/8" basis)	No
EU-STVDRY#2 Combined EFs for Heating & Cooling Zones and Fugitives	$PM/PM_{10}/PM_{2.5}$	0.56/0.53/0.14	lb/1000 ft.^{2} (3/8" basis)	No
	VOC	1.9	lb/1000 ft.^{2} (3/8" basis)	Yes
	Acetaldehyde	0.027	lb/1000 ft.^{2} (3/8" basis)	No
	Acrolein	0.001	lb/1000 ft.^{2} (3/8" basis)	No
	Benzene	0.00059	lb/1000 ft.^{2} (3/8" basis)	No
	Formaldehyde	0.016	lb/1000 ft.^{2} (3/8" basis)	Yes
	Methanol	0.059	lb/1000 ft.^{2} (3/8" basis)	Yes
	Phenol	0.016	lb/1000 ft.^{2} (3/8" basis)	No
	Propionaldehyde	0.0024	lb/1000 ft.^{2} (3/8" basis)	No
	Toluene	0.0011	lb/1000 ft.^{2} (3/8" basis)	No
	m,p-xylene	0.00075	lb/1000 ft.^{2} (3/8" basis)	No
	Aggregate HAP	0.124	lb/1000 ft.^{2} (3/8" basis)	No
EU-PLYPRS(5)	VOC	0.085	lb/1000 ft.^{2} (3/8" basis)	Yes
	Acetaldehyde	0.0042	lb/1000 ft.^{2} (3/8" basis)	No
	Formaldehyde	0.00080	lb/1000 ft.^{2} (3/8" basis)	Yes
	Methanol	0.019	lb/1000 ft.^{2} (3/8" basis)	Yes
	Phenol	0.001	lb/1000 ft.^{2} (3/8" basis)	No
	Propionaldehyde	0.002	lb/1000 ft.^{2} (3/8" basis)	No
	Aggregate HAP	0.028	lb/1000 ft.^{2} (3/8" basis)	No
EU-PLYMISC	VOC	0.154	lb/1000 ft.^{2} (3/8" basis)	No
	Acetaldehyde	0.0009	lb/1000 ft.^{2} (3/8" basis)	No
	Formaldehyde	0.0003	lb/1000 ft.^{2} (3/8" basis)	No
	Methanol	0.020	lb/1000 ft.^{2} (3/8" basis)	No
	Aggregate HAP	0.021	lb/1000 ft.^{2} (3/8" basis)	No
EU-Boiler w/Diesel Backup	Natural Gas EFs			
	$PM/PM_{10}/PM_{2.5}$	2.5/2.5/2.5	lb/10^6 scf	No
	CO	84	lb/10^6 scf	No
	NO_x	100	lb/10^6 scf	No
	SO_2	1.7	lb/10^6 scf	No
	VOC (NMTOC)	5.5	lb/10^6 scf	No

Emission Unit	Pollutant	Emission Factor (EF)	EF Units	EF Verification &/or Source Testing
	No. 2 Fuel Oil EFs			
	Opacity	NA	6-min Avg %	Yes
	$PM/PM_{10}/PM_{2.5}$	3.3/2.3/1.6	lb/1000 gallons	No
	CO	5	lb/1000 gallons	No
	NO_x	20	lb/1000 gallons	No
	SO_2	71	lb/1000 gallons	No
	VOC (NMTOC)	0.2	lb/1000 gallons	No

Testing Requirements:

24. The permittee must conduct emission factor verification tests and compliance source tests in accordance with the DEQ's Source Sampling Manual and the testing requirements specified in Conditions 24.a and 24.b for the emission units/emission factors identified in Condition 23 as follows:

24.a. **Within 18 months of issuance** of this permit, the permittee must conduct source tests on the scrubber outlets (Burley Scrubber-1 and Burley Scrubber-2) for each of the veneer dryers, EU-NGVDRY and EU-STVDRY, and plywood presses, EU-PLYPRS, to evaluate VOC emission factors and HAP emission factors for methanol and formaldehyde using the test methods listed below.

24.a.i. EPA Method 25A and EPA Methods 1 through 4 for VOC plus methanol and formaldehyde or an alternative method(s) approved by LRAPA; and
24.a.ii. Methanol: NCASI Method CI 98.01 (midget impingers with water; analysis by GC/FID), and
24.a.iii. Formaldehyde: NCASI Method CI 98.01 (midget impingers with water; analysis by spectrophotometer).

24.b. In accordance with the testing schedules in Conditions 14.c and 14.d, the permittee must conduct performance tests on EU-Boiler to evaluate opacity while burning distillate oil using EPA Method 9 for Opacity.

24.c. Unless otherwise specified by permit condition or LRAPA-approved source test plan, all compliance source tests must be performed at levels that equal or exceed ninety percent (90%) of normal maximum operating rates and under typical worst-case conditions that generate highest emissions for existing equipment).

24.d. Each source test must consist of at least three (3) runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

24.e. All tests must be conducted in accordance with DEQ's Source Sampling Manual and the approved pretest plan. The pretest plan must be submitted at least 30 days in advance of the date of the test. Source tests reports and approved by the LRAPA of completing the test, unless otherwise approved in the pretest plan. [LRAPA 35-0120(3)]

24.f. Only regular operating staff may adjust the combustion system or production processes and emission control parameters during the source test and within two (2) hours prior to the source test. Any operating adjustments made during the source test, which are a result of consultation with the source testing personnel, equipment vendors or

consultants, may render the source test invalid.

Notification & Reporting Requirements:

25. ***The permittee must submit to LRAPA by February 15 of each year*** this permit is in effect, the following information for the preceding calendar year:

    25.a. The excess emission log information required per Conditions 14.f and G13, if required by Condition G13.

    25.b. Annual emissions as calculated according to Condition 22 including the supporting process parameters and emission factor information.

    25.c. List and effective date of permanent changes made in plant processes, production levels, and pollution control equipment which affected air contaminant emissions.

    25.d. List major maintenance performed on pollution control equipment.

    25.e. Greenhouse Gas (GHG) Registration and Reporting: If the annual emission rate of greenhouse gases (CO_2e) is greater than or equal to 2,756 tons per year (2,500 metric tons per year), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340 division 215. [OAR-340-215-0030 and 340-215-0030]

26. In accordance with 40 CFR 60.48(c), the permittee must submit semi-annual reports of the use of No.2 oil for quarters when No. 2 oil is used. The semi-annual reports must be postmarked by the 30th day following the end of the reporting period and must include the information specified in Conditions 15 a-d. [40 CFR 60.48c(d), (e), (f), (i) and (j)]

Outdoor Burning

27. The permittee is prohibited from conducting outdoor burning on the plant site. [LRAPA 47-001]

Fee Schedule

28. In accordance with adopted regulations, the permittee will be invoiced by ***October 1st*** for the annual fee due ***December 1st*** each year for the associated Standard Air Contaminant Discharge Permit (ACDP). [LRAPA 37-0020 Table 2]

29. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions must be reported to the following office: [LRAPA 35-160]

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

KEC/cmw
7/11/2019

Abbreviations and Acronyms

The following is a list of abbreviations and acronyms that may be used in this permit:

ACDP	Air Contaminant Discharge Permit
ASTM	American Society for Testing and Materials
AQMA	Air Quality Maintenance Area
BDT	Bone dry ton
calendar year	The 12-month period beginning January 1st and ending December 31st
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CO2e	Carbon dioxide equivalent
DEQ	Oregon Department of Environmental Quality
Dscf	dry standard cubic foot
EPA	US Environmental Protection Agency
FCAA	Federal Clean Air Act
ft^2	square foot
GHG	Greenhouse gases
gr/dscf	grains per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44
I&M	Inspection and Maintenance
Lb(s)	pound(s)
LRAPA	Lane Regional Air Protection Agency
MBF	1000 Board Feet
MM	Million
MMBtu	million British thermal units
MSF	1000 Square Feet
NA	not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO_X	nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O_2	oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	pollution control device
PM	particulate matter
PM_{10}	particulate matter less than 10 microns in size
$PM_{2.5}$	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
PCWP	Plywood and Composite Wood Products
RACT	Reasonably Available Control Technology
scf	standard cubic foot
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO_2	sulfur dioxide
Special Control Area	as defined in LRAPA Title 29
TACT	Typically Achievable Control Technology
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 must 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 must not cause or permit the deposition of any particulate matter which is larger than 250 microns in size at sufficient duration and quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055]

G5. The permittee must not 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 must 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 must 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 32-050(1)]

G8. The permittee must 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 must 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 may not cause or allow air contaminants from any source subject to regulation by LRAPA to cause 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 devices 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 NSPS 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 must 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 must immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.

G15. The permittee must keep an upset log of all planned and unplanned excess emissions. The upset log must 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 must be kept by the permittee for five (5) calendar years. [LRAPA 36-025(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 emitted 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 result in 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 $PM_{2.5}$ or PM_{10} 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 must immediately notify LRAPA by telephone of the situation, and must 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. Permittees 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 change 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 must 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. [LRAPA 37-0030(4)]

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 180 days prior to the permit expiration date for Simple ACDPs, and 180 days prior to the permit expiration date for Standard ACDP. [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 will 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 60th 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 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 under 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 permittee's written request for hearing must be received by LRAPA within 90 days of service of the notice on the permittee and 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 must 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 limit to, demolition, renovation, repair, construction, and maintenance. [LRAPA Title 43]

[Revised 1/12/18]