

LANE REGIONAL AIR PROTECTION AGENCY

1010 Main Street, Springfield, Oregon 97477

(541) 736-1056

STANDARD AIR CONTAMINANT DISCHARGE PERMIT (ACDP)

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

Issued To:

Seneca Sawmill Company

90201 Highway 99N

Eugene, Oregon 97402

Information Relied Upon:

Application Number: 65408

Dated: October 1, 2019

Land Use Compatibility Statement:

From: City of Eugene

Date: January 22, 2001

Mailing Address:

P.O. Box 851

Eugene, Oregon 97440

Fee Basis:

Title 37, Table1:

B.62, Sawmill and/or Planing Mill >25,000 bd. ft. per shift,

C.3, Source electing to maintain their netting basis

Permit Number: 207459

Permit Type: Standard

Primary SIC: 2421 - Sawmill/Planing Mill

Date Renewed:

Expiration Date:

Specific Emission Units:

Sawmill/Planing Mill Activities

Six (6) Dry Kilns

One (1) 50 MMBtu/hr Natural Gas-Fired Boiler

DRAFT

Issued

By: _____

Merlyn L. Hough, Director

Effective

Date: _____

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge 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 Description

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

EU ID	Emission Unit Description	Control Device Description	PCD ID
MH	Sawmill/Planing Mill Activities	Three (3) Baghouses and Five (5) Cyclones	EP-01 EP-02 EP-04 EP-05 EP-06 EP-07 EP-08 EP-12
Kilns	Six (6) Dry Kilns	None	None
Boiler-3	One (1) 50 MMBtu/hr Natural Gas-Fired Boiler	None	None
<u>Categorically Insignificant Activities</u>			
CIA-1	Diesel-Fired 150 kW Emergency Generator	None	None
CIA-2	On-Site Storage Tanks (Diesel and Gasoline)	None	None

Plant Site Emission Limits (PSELs)

3. Total emissions from all sources located at the facility must not exceed the PSELs below. The PSELs apply to any consecutive 12 calendar month period. [LRAPA 42-0041, 42-0060]

Pollutant	Plant Site Emission Limits (PSEL) (TPY)
PM	49
PM ₁₀	35
PM _{2.5}	21
CO	99
NO _x	39
SO ₂	39
VOC	99
GHG (as CO ₂ equiv.)	74,000
Each Individual FHAP from the combination of Seneca Sawmill (207459) and Seneca Sustainable Energy ("SSE" - 206470)	9
Aggregate of FHAPs from the combination of Seneca Sawmill (207459) and Seneca Sustainable Energy (206470)	24

PSEL Monitoring and Compliance

4. By the 15th working day of each month, the permittee must determine compliance with the previous consecutive 12 calendar month PSELs. Compliance with the PSELs are determined for each consecutive 12 calendar month period based on the following calculation for each pollutant, except for GHGs: [LRAPA 34-016 and 35-0270]

$$E = \sum (EF \cdot F) / 2000$$

where,

E = pollutant emissions (tons/year);

∑ = symbol representing “summation of”

EF = pollutant emission factor (see Condition 5);

F = fuel combustion or material throughput (see Condition 44);

5. 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 34-016]

EU ID	Emission Unit Description	Pollutant	Emission Factor (EF)	EF units
Boiler-3	Boiler-3 combusting natural gas	PM/PM ₁₀ /PM _{2.5}	2.5	Lb/MMCF
		SO ₂	1.7	Lb/MMCF
		NO _x	36.72	Lb/MMCF
		CO	37.74	Lb/MMCF
		VOC	5.5	Lb/MMCF
		Aggregate FHAP	0.62	Lb/MMCF
		Single FHAP*	0.0031	Lb/MMCF
Kilns	Dry kilns processing Douglas Fir	PM/PM ₁₀ /PM _{2.5}	0.02	Lb/MBF
		VOC	0.768	Lb/MBF
		Aggregate FHAP	0.0924	Lb/MBF
		Single FHAP*	0.051	Lb/MBF
	Dry kilns processing Hemlock Fir	PM/PM ₁₀ /PM _{2.5}	0.05	Lb/MBF
		VOC	0.38	Lb/MBF
		Aggregate FHAP	0.2049	Lb/MBF
		Single FHAP*	0.12	Lb/MBF
MH	Sawmill baghouses	PM/PM ₁₀ /PM _{2.5}	0.001	Lb/BDT
	Sawmill cyclones	PM/PM ₁₀ /PM _{2.5}	0.5/0.43/0.25	Lb/BDT
	Sawmill target boxes	PM/PM ₁₀ /PM _{2.5}	0.1/0.085/0.05	Lb/BDT

*Single FHAP = single FHAP with the highest potential to emit (acetaldehyde)

6. For GHGs, the permittee must register and report emissions in accordance with OAR 340-215. [LRAPA 34-016]

General Emission Limitations

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

- 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;
 - b. Application of water or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
 - 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;
 - d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
 - e. Adequate containment during sandblasting or other similar operations;
 - f. The covering of moving, open bodied trucks transporting materials likely to become airborne;
 - g. The prompt removal from paved streets of earth or other material which does or may become airborne.
8. For sources, other than wood-fired boilers, the permittee must not emit or allow to be emitted any visible emissions or equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 32-010(3)]
 9. For sources other than fuel burning equipment, refuse burning equipment and fugitive emissions, the permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified before June 1, 1970 in excess of 0.15 grains per dry standard cubic foot on or after Jan. 1, 2020. [LRAPA 32-015(2)(a)(B)(ii)]
 10. For sources other than fuel burning equipment, refuse burning equipment and fugitive emissions, the permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 in excess of 0.14 grains per dry standard cubic foot if there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
 11. For sources other than fuel burning equipment, refuse burning equipment and fugitive emissions, the permittee must not cause, suffer, allow, or permit particulate matter emissions from any air contaminant source installed, constructed or modified after April 16, 2015 in excess of 0.10 grains per dry standard cubic foot. [LRAPA 32-015(2)(c)]
 12. The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045]
 13. Operation and Maintenance Plan (O&M Plan). The permittee must prepare and update, as needed, an O&M Plan for air pollution control equipment and emission reduction processes associated with Sawmill/Planing Mill Activities. The permittee must submit a copy of the O&M Plan to LRAPA for review upon request. If LRAPA determines the O&M Plan is deficient, LRAPA may require the permittee to amend the plan. At minimum, the O&M Plan must include inspection schedules for all particulate matter control systems, including but not limited to cyclones and baghouses. The O&M Plan must identify procedures for recording the date and time of any inspections, identification of the equipment inspected, the results of the inspection, and the actions taken if repairs or maintenance are necessary. [LRAPA 32-007(1)]

Federal Hazardous Air Pollutant Limitations (FHAPs)

14. The combined FHAP(s) emitted from Seneca Sawmill Company (207459) and Seneca Sustainable Energy (206470) must not exceed 9 tons/year for any single FHAP during any consecutive 12 calendar month period and 24 tons/year of the aggregate of FHAPs during any consecutive 12 calendar month period. [LRAPA 42-0060]
15. To demonstrate compliance with Conditions 3 and 14, the permittee must calculate the total

FHAP(s) emissions from Seneca Sawmill Company (207459) in accordance with Condition 4 for each consecutive 12 calendar month period. The permittee must then add the total FHAP emissions from Seneca Sawmill Company with the FHAP emissions from Seneca Sustainable Energy (206470) for the same consecutive 12 calendar month period and compare the results to the FHAP limitations in Conditions 3 and 14. [LRAPA 32-007 and 42-0080]

16. To ensure that FHAP emissions from the dry kilns remain at the lowest extent possible, the permittee must limit the maximum temperature in each kiln to no more than 200 degrees Fahrenheit (200 °F). The permittee must record the temperature of each kiln at least twice during each charge. [LRAPA 32-007 and 42-0080]

Emission Limitations Specific to Boiler-3

17. For fuel burning equipment sources installed, constructed, or modified after April 16, 2015, except solid fuel burning devices that have been certified under OAR 340-262-0500, the permittee must not cause, suffer, allow, or permit particulate matter emissions from any fuel burning equipment in excess of 0.10 grains per dry standard cubic foot. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air. [LRAPA 32-030(2) and (3)(b)]
18. The permittee must combust only natural gas in Boiler-3. [LRAPA 32-009(4)]

Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (NSPS) – 40 CFR Subpart Dc
19. The permittee must record and maintain records of the amount of each fuel combusted by Boiler-3 during each calendar month. [LRAPA 46-535(3)(e) and 40 CFR 60.48c(g)(2)]

Emission Limitations Specific to Categorically Insignificant Activities

CIA-1 – Diesel-Fired 150 kW Emergency Generator

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

20. *Stationary RICE subject to Regulations under 40 CFR Part 60.* An affected source that meets the criteria in Condition 20.a. must meet the requirements of this part by meeting the requirements of 40 CFR part 60 subpart IIII, for compression ignition engines. No further requirements apply for such engines under 40 CFR 63 subpart ZZZZ. [LRAPA 44-150(5)(ffff) and 40 CFR 63.6590(c)]
 - a. A new or reconstructed stationary RICE located at an area source; [LRAPA 44-150(5)(ffff) and 40 CFR 63.6590(c)(1)]

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

21. Permittees that own and operate a 2007 model year and later emergency stationary CI ICE with maximum engine power greater than or equal to 37 KW (50 HP) and less than or equal to 2,237 KW (3,000 HP) and a displacement of less than 10 liters per cylinder that are not fire pump engines must comply with the certification emission standards for new nonroad CI engines for the same model year and maximum engine power in 40 CFR 89.112 and 40 CFR 89.113 for all pollutants. [LRAPA 44-150(5)(ffff), 40 CFR 60.4202(a)(2) and 40 CFR 60.4205(b)]
22. Owners and operators of stationary CI ICE must operate and maintain stationary CI ICE that achieve the emission standards as required in Condition 21 over the entire life of the engine. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4206]

23. Beginning October 1, 2010, owners and operators of stationary CI ICE subject to this subpart with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Pursuant to 40 CFR 80.510(b)(1)(i), the sulfur content for nonroad diesel fuel may not exceed 15 ppm (0.0015 percent by weight). [LRAPA 44-150(5)(ffff), 40 CFR 60.4207(b) and 40 CFR 80.510(b)(1)(i)]
24. The permittee must meet the monitoring requirements of this section. In addition, you must also meet the monitoring requirements specified in Condition 25. LRAPA 44-150(5)(ffff) and [40 CFR 60.4209]
 - a. The permittee of an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines, you must install a non-resettable hour meter prior to startup of the engine. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4209(a)]
25. If the permittee is an owner or operator of a stationary CI internal combustion engine, the permittee must meet the following compliance requirements: [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211]
 - a. Owner or operators that must comply with the emission standards specified in this subpart must do all of the following, except as permitted under Condition 25.d.: [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(a)]
 - i. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(a)(1)]
 - ii. Change only those emission-related settings that are permitted by the manufacturer; and [LRAPA 44-150 and 40 CFR 60.4211(a)(2)]
 - iii. Meet the requirements of 40 CFR parts 89, 94 and/or 1068, as they apply. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(a)(3)]
 - b. Owners or operators of a 2007 model year and later stationary CI internal combustion engine must comply with the emission standards specified in Condition 21, and must comply by purchasing an engine certified to the emission standards in Condition 21, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in Condition 25.d. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(c)]
 - c. If the permittee owns or operates an emergency stationary ICE, the permittee must operate the emergency stationary ICE according to the requirements in Conditions 25.c.i. and 25.c.ii.. In order for the engine to be considered an emergency stationary ICE under this subpart, any operation other than emergency operation and maintenance and testing, as described in Conditions 25.c.i. and 25.c.ii., is prohibited. If you do not operate the engine according to the requirements in Conditions 25.c.i. and 25.c.ii., the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(f)]
 - i. There is no time limit on the use of emergency stationary ICE in emergency situations. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(f)(1)]
 - ii. The permittee may operate your emergency stationary ICE for any combination of the purposes specified in Condition 25.c.ii.1. for a maximum of 100 hours per calendar year. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(f)(2)]
 1. Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The owner or operator may petition the Administrator of

US EPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(f)(2)(i)]

- d. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(g)]
 - i. If the permittee is an owner or operator of a stationary CI internal combustion engine greater than 500 HP, the permittee must keep a maintenance plan and records of conducted maintenance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within 1 year of startup, or within 1 year after an engine and control device is no longer installed, configured, operated, and maintained in accordance with the manufacturer's emission-related written instructions, or within 1 year after you change emission-related settings in a way that is not permitted by the manufacturer. The permittee must conduct subsequent performance testing every 8,760 hours of engine operation or 3 years, whichever comes first, thereafter to demonstrate compliance with the applicable emission standards. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4211(g)(3)]
26. If the permittee is an owner or operator of a stationary CI internal combustion engine, the permittee must meet the following notification, reporting, and recordkeeping requirements: [LRAPA 44-150(5)(ffff) and 40 CFR 60.4214]
- a. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the owner or operator is not required to submit an initial notification. Starting with the model years in table 5 to 40 CFR 63 Subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the owner or operator must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The owner must record the time of operation of the engine and the reason the engine was in operation during that time. [LRAPA 44-150(5)(ffff) and 40 CFR 60.4214(b)]

CIA-2 – On-Site Storage Tanks (Diesel and Gasoline)

27. The affected source to which the emission standards apply is each gasoline dispensing facility (GDF). The affected source includes each gasoline cargo tank during the unloading of gasoline to a GDF and also includes each storage tank. [LRAPA 44-190(1)] This condition is enforceable only by LRAPA.
28. The permittee of a GDF that has any gasoline storage tanks with a capacity of 250 gallons or more must comply with the work practice requirements and the submerged fill requirements in Condition 36. [LRAPA 44-190(3)] This condition is enforceable only by LRAPA.
29. The permittee of a GDF whose total volume of gasoline that is loaded into all gasoline storage tanks greater than 250 gallon capacity must comply with the vapor balance requirements in LRAPA 44-240 if either: [LRAPA 44-190(4)] This condition is enforceable only by LRAPA.
- a. The annual throughput is 480,000 gallons or more in any 12 consecutive months; or
 - b. The monthly throughput is 100,000 gallons or more, as calculated on a rolling 30 day

basis.

30. The permittee of each GDF must, upon request by LRAPA, demonstrate that their annual and average monthly gasoline throughput is below any applicable thresholds. [LRAPA 44-190(5)] This condition is enforceable only by LRAPA.
31. Monthly throughput is the total volume of gasoline loaded into, or dispensed from, all the gasoline storage tanks located at a single affected GDF. If an area source has two or more GDFs at separate locations within the area source, each GDF is treated as a separate affected source. [LRAPA 44-190(8)] This condition is enforceable only by LRAPA.
32. If the affected source's throughput ever exceeds an applicable throughput threshold, the permittee of the affected source will remain subject to the requirements for sources above the threshold, even if the affected source throughput later falls below the applicable throughput threshold. [LRAPA 44-190(9)] This condition is enforceable only by LRAPA.
33. The dispensing of gasoline from a fixed gasoline storage tank at a GDF into a portable gasoline tank for the on-site delivery and subsequent dispensing of the gasoline into the fuel tank of a motor vehicle or other gasoline-fueled engine or equipment used within the area source is only subject to Section 36. [LRAPA 44-190(10)] This condition is enforceable only by LRAPA.
34. For any affected source subject to the provisions of LRAPA 44-170 through 44-290 and another federal rule, the permittee may elect to comply only with the more stringent provisions of the applicable rules. The permittee of an affected source must consider all provisions of the rules, including monitoring, recordkeeping, and reporting. The permittee of an affected source must identify the affected source and provisions with which the permittee of an affected source will comply in the Notification of Compliance Status required under LRAPA 44-260. The permittee of an affected source also must demonstrate in the Notification of Compliance Status that each provision with which the permittee of an affected source will comply is at least as stringent as the otherwise applicable requirements in LRAPA 44-170 through 44-290. The permittee of an affected source is responsible for making accurate determinations concerning the more stringent provisions, and noncompliance with this rule is not excused if it is later determined that your determination was in error, and, as a result, the permittee of an affected source is violating LRAPA 44-170 through 44-290. Compliance with this rule is the owner's or operator's responsibility and the Notification of Compliance Status does not alter or affect that responsibility. [LRAPA 44-190(11)] This condition is enforceable only by LRAPA.
35. The permittee of an affected source must comply with the following requirements: [LRAPA 44-225] This condition is enforceable only by LRAPA.
 - a. The permittee of an affected source must, at all times, operate and maintain any affected source, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA and the EPA Administrator which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspections of the source.
 - b. The permittee of an affected source must keep applicable records and submit reports as specified in Condition 42.
36. The permittee must take reasonable precautions to prevent gasoline vapor releases to the atmosphere from a GDF. Reasonable precautions include, but are not be limited to, the following: [LRAPA 44-230(1)&(7)] This condition is enforceable only by LRAPA.
 - a. Minimize gasoline spills;
 - b. Do not top off or overfill vehicle tanks. If a person can confirm that a vehicle tank is not full

- after the nozzle clicks off, such as by check the vehicle's fuel tank gauge, the person may continue to dispense fuel using best judgement and caution to prevent a spill;
- c. Post a sign on the GDF instructing a person filling up a motor vehicle to not top off vehicle tanks;
 - d. Clean up spills as expeditiously as practicable;
 - e. Cover all gasoline storage fill pipes with a gasketed seal and all gasoline containers when not in use. Portable gasoline containers that meet the requirements of 40 C.F.R. part 59 subpart F are considered acceptable for compliance with this condition;
 - f. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators;
 - g. Ensure cargo tanks unloading to the gasoline AST also comply with Conditions 36.a., 36.d., and 36.e.
37. The permittee of cargo tank or GDF must only load gasoline into storage tanks at the facility by utilizing filling as specified in Conditions 37.a., b., or c. The applicable distance in Conditions 37.a. and b. must be measured from the point in the opening of the submerged fill pipe that is the greatest distance from the bottom of the storage tank. [LRAPA 44-230(3)] This condition is enforceable only by LRAPA.
- a. Submerged fill pipes installed on or before November 9, 2006, must extend to no less than 12 inches from the bottom of the storage tank.
 - b. Submerged fill pipes installed after November 9, 2006, must extend to no less than 6 inches from the bottom of the storage tank.
 - c. Submerged fill pipes not meeting the specifications of Condition 37.a. or b. are allowed if the permittee of a GDF can demonstrate that the liquid level in the tank is always above the entire opening of the fill pipe. Documentation providing such demonstration must be made available for inspection by LRAPA and the EPA Administrator during the course of a site visit.
38. The permittee must submit the applicable notifications as required in LRAPA 44-260. [LRAPA 44-230(4)] This condition is enforceable only by LRAPA.
39. The permittee must have records available within 24 hours of a request by the LRAPA or the EPA Administrator to document gasoline throughput. [LRAPA 44-230(5)] This condition is enforceable only by LRAPA.
40. The permittee must comply with the requirements of this section by the applicable dates specified in LRAPA 44-220. [LRAPA 44-230(6)] This condition is enforceable only by LRAPA.
41. The permittee must keep records of the total monthly and annual throughput in gallons as defined. These records must be kept for a period of 5 years and must be available within 24 hours of a request by LRAPA and the EPA Administrator. [LRAPA 44-270(1)(c)&(2)] This condition is enforceable only by LRAPA.
42. The permittee must keep the following records: [LRAPA 44-270(4)] This condition is enforceable only by LRAPA.
- a. Records of the occurrence and duration of each malfunction of operation, i.e., process equipment, or the air pollution control and monitoring equipment.
 - b. Records of actions taken during periods of malfunction to minimize emissions in accordance with Section 35.b., including corrective actions to restore malfunctioning process and air pollution control and monitoring equipment to its normal or usual manner of operation.
43. Annual Report. The permittee of a GDF that has monthly throughput of 10,000 gallons of gasoline or more must report, by February 15 of each year, the following information, as applicable: [LRAPA 44-280(2)(a), (2)(d) and (2)(e)] This condition is enforceable only by LRAPA.

- a. The total throughput volume of gasoline, in gallons, for each calendar month.
- b. The number, duration, and a brief description of each type of malfunction which occurred during the previous calendar year and which caused or may have caused any applicable emission limitation to be exceeded.
- c. A description of actions taken by the owner or operator of a GDF during a malfunction to minimize emissions in accordance with Condition 35.b., including actions take to correct a malfunction.

Monitoring and Recordkeeping Requirements

44. A record of the following data must be maintained at the plant site for a period of five (5) years following date of entry and must be available for inspection by authorized representatives of LRAPA. [LRAPA 34-016 and 42-0080]

Activity	Units	Minimum Recording Frequency
PSEL Recordkeeping		
Stud mill production	MBF	Monthly
Mill A lumber production	MBF	Monthly
Dry Kiln Throughput by species	MBF	Monthly
Chips shipped from plant site, including to SSE	BDT	Monthly
Sawdust shipped from plant site, including to SSE	BDT	Monthly
Shavings shipped from plant site, including to SSE	BDT	Monthly
Natural gas combusted	MMSCF	Monthly
Dry kiln temperature (degrees F)	Degrees F	Twice per charge
Operation and Maintenance Plan	NA	Maintain the current version on-site
NSPS Dc Recordkeeping		
Initial notification for NSPS Dc	NA	One time
Natural gas combusted	MMSCF	Monthly
NSPS IIII Recordkeeping		
Fuel oil fuel supplier certifications	NA	Each delivery
The date and time of operation of CIA-1	Date, Hours of operation	Each occurrence
Reason for operation of CIA-1	NA	Each occurrence
The amount of time that CIA-1 operates for non-emergency reasons in a calendar year	Hours	Monthly
Title 44 Recordkeeping		
Initial notification	NA	One time
The monthly gasoline throughput of the GDF	Gallons	Monthly
The annual gasoline throughput of the GDF in any 12 consecutive months	Gallons	Monthly
Documentation of the distance the submerged fill pipe extends from the bottom of each storage tank	NA	Documentation
Records of the occurrence and duration of each malfunction of operation	NA	Each occurrence
Records of actions taken during periods of malfunction to minimize emissions	NA	Each occurrence

Reporting Requirements

45. The permittee must submit to LRAPA the following reports by the dates indicated in the table below: [LRAPA 34-016, 36-025(4)(a), 42-0080, 44-280(2), 40 CFR 60.48c(d),]

Report	Reporting Period	Due Date
Title 44 Report	Annual	February 15
The excess emission log information required by Condition G.13, if required by G.13.	Annual	March 1
Annual emissions as calculated according to Conditions 4, 6 and 15, including the supporting process parameter and emission factor information	Annual	March 1
GHG Report	Annual	March 31

46. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions must be reported to the following office: [LRAPA 34-016]

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

Outdoor Burning

47. Outdoor burning is prohibited in accordance with the requirements of LRAPA 47-020.

Fee Schedule

48. In accordance with adopted regulations, the permittee will be invoiced for the annual permit fees on October 1st, with fees due December 1st of each year. [LRAPA 37-8020 Table 2]

JJW/CMW
10/29/2019

Abbreviations, Acronyms, and Definitions

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 1 st and ending December 31 st
CPDS	Certified Product Data Sheet
CFR	Code of Federal Regulations
CO	Carbon monoxide
CO _{2e}	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
FHAP	Federal Hazardous Air Pollutant as defined by LRAPA Title 44
lb	Pound(s)
LRAPA	Lane Regional Air Protection Agency
MSF	Thousand square feet
MM	Million
MMBtu	Million British thermal units
N/A	Not applicable
NESHAP	National Emissions Standards for Hazardous Air Pollutants
NO _x	Nitrogen oxides
NSPS	New Source Performance Standard
NSR	New Source Review
O&M	Operation and Maintenance
O ₂	Oxygen
OAR	Oregon Administrative Rules
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
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
TACT	Typically Achievable Control Technology
scf	Standard cubic foot
SDS	Safety Data Sheet
SER	Significant Emission Rate
SIC	Standard Industrial Code
SIP	State Implementation Plan
SO ₂	Sulfur dioxide
VE	Visible emissions
VOC	Volatile organic compound
year	A period consisting of any 12-consecutive calendar months

GENERAL PERMIT CONDITIONS

General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request. [LRAPA 37-0020(3)]
- G2. The permittee 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 PM₁₀ 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 120 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 1/19/18]