



LANE REGIONAL AIR PROTECTION AGENCY OREGON TITLE V OPERATING PERMIT

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

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

ISSUED TO:

Rosboro Company, LLC - Springfield Facility

P.O. Box 20

Springfield, Oregon 97477

INFORMATION RELIED UPON:

Renewal Application No. 62750 Received 04/18/2017

Renewal Application No. 64497 Received 11/08/2018

Renewal Application No. 65721 Received 12/11/2019

Minor Modification Simple No. 62592 Rec'd 03/14/2017

Minor Modification Simple No. 64157 Rec'd 07/30/2018

PLANT SITE LOCATION:

2509 Main Street

Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield

Dated: 09/06/95

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

MAR 13 2020

Date

Nature of Business: Laminated Beam Manufacturing

Primary SIC (NAICS): 2439 Structural Wood Members (321213)

2421 Sawmill &/or Planing Mill (321113)

Secondary SIC (NAICS): 4961 Fuel-burning equipment (221330)

RESPONSIBLE OFFICIAL

Title: VP of Operations

FACILITY CONTACT PERSON

Name: James Monson Daniels

Title: QC/Environmental Supervisor

Phone: (541) 736-2146

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit	NO _x	Nitrogen oxides
AQMA	Air Quality Management Area	NSPS	New Source Performance Standards
Act	Federal Clean Air Act	NSR	New Source Review
ASTM	American Society of Testing and Materials	O ₂	Oxygen
Btu	British thermal unit	OAR	Oregon Administrative Rules
CAM	Compliance Assurance Monitoring	ODEQ	Oregon Department of Environmental Quality
CAO	Cleaner Air Oregon	OPR	Operation
CEMS	Continuous Emissions Monitoring System	ORS	Oregon Revised Statutes
CFR	Code of Federal Regulations	O&M	Operation and maintenance
CI	Compression Ignition	Pb	Lead
CMS	Continuous Monitoring System	PCD	Pollution Control Device
CO	Carbon Monoxide	PM	Particulate matter
CO ₂	Carbon dioxide	PM _{2.5}	Particulate matter less than 2.5 microns in size
CO _{2e}	Carbon dioxide equivalent	PM ₁₀	Particulate matter less than 10 microns in size
COMS	Continuous Opacity Monitoring System	ppm	Parts per million
CPDS	Certified Product Data Sheet	PSEL	Plant Site Emission Limit
CPMS	Continuous parameter monitoring system	psia	pounds per square inch, actual
DEQ	Department of Environmental Quality	PTE	Potential to Emit
dscf	Dry standard cubic feet	RICE	Reciprocating Internal Combustion Engine
EF	Emission factor	SACC	Semi-Annual Compliance Certification
EPA	US Environmental Protection Agency	SCEMP	Surrogate Compliance Emissions Monitoring Paramater
EU	Emissions Unit	Scf	Standard cubic foot
FCAA	Federal Clean Air Act	SER	Significant emission rate
ft ²	Square foot	SERP	Source emissions reduction plan
FSA	Fuel sampling and analysis	SI	Spark Ignition
GHG	Greenhouse Gas	SIC	Standard Industrial Code
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SIP	State Implementation Plan
HAP	Hazardous Air Pollutant as defined by LRAPA Title 12	SO ₂	Sulfur dioxide
HCFC	Halogenated Chloro-Fluoro-Carbons	ST	Source test
Hr	Hour	TACT	Typically Achievable Control Technology
ID	Identification number or label	TPY	Tons per year
I&M	Inspection and maintenance	VE	Visible emissions
Lb	Pound	VMT	Vehicle miles traveled
LRAPA	Lane Regional Air Protection Agency	VOC	Volatile organic compounds
MACT	Maximum Achievable Control Technology	VHAP	Volatile hazardous air pollutant
MM	Million	Year	A period consisting of any 12-consecutive calendar month
MMBtu	Million British thermal units		
NA	Not applicable		
NESHAP	National Emission Standards for Hazardous Air Pollutants		

DEFINITIONS:

Modified EPA Method 9: As used in this permit “Modified EPA Method 9” is defined as follows: Opacity must be measured in accordance with EPA Method 9 using the data reduction procedures in EPA Method 203B. For all standards, the minimum observation period must be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. See also the definition of “Opacity” in LRAPA Title 12.

PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2) and LRAPA 34-180]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA, and citizens under the Clean Air Act, except as specified below:
 - 2.a. Conditions 6, 7, 8, G5, and G9 (LRAPA Title 43) are only enforceable by the LRAPA. [OAR 340-218-0060]

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

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

Table 1. Emission Unit and Pollution Control Device Identification

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Boilers – Three (3) wood-fired boilers	EU-01	Multiclone Multiclone Multiclone	CD-01.1 CD-01.2 CD-01.3
Plantsite Fugitives	EU-02	None	NA
Cyclone #1 (Planer Shavings) Cyclone #4 (Mill B Planer shavings/sawdust) Cyclone #20 (Slabber chips) Cyclone #16 (Lam Plant Sizer shavings) Cyclone #17 (Lam Plant sawdust/shavings)	EU-03 (Cyclones)	Baghouse #5 Baghouse #5 None Baghouse #26 None	CD-04B.1 CD-04B.1 CD-03A.3 CD-04B.2 CD-03A.5
Target Box (Mill B Overs Chipper) Target Box (Ply Bin Stand-by)	EU-03 (Target Boxes)	None None	CD-03B.1 CD-03B.2
Baghouses	EU-04	Baghouse #5 Baghouse #18 (Baghouses #21 & #22 on stand-by) Baghouse #26	CD-04B.1 CD-04A.3 CD-04B.2
VOC (not listed elsewhere)	EU-05	None	NA
Dry Kilns – Nine (9) Dry Kilns	EU-08	None	NA
Aggregate Insignificant Activities- Unpaved Roads	EU-AI	None	NA

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

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

Table 2. Facility-Wide Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015(1)	4	Fugitive Emissions	Minimize	I&M Recordkeeping	5
49-010(1)	6	Nuisance	Prohibited	Recordkeeping	7
32-055	8	PM Fallout	No Deposition of PM >250 µm on Others' Property	I&M Recordkeeping	9
32-050 (1) & (2)	10	Concealment & Masking	Prohibited	I&M Recordkeeping	11
51-015	12	SERP	Reduce Emissions	Recordkeeping	13
40 CFR Part 68	14	Risk Management	Risk Management Plan	NA	14

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

5. Monitoring Requirement: At least once each week, the permittee must visually survey the plant for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the plant site boundaries for more than 18 seconds in a six-minute period. The person conducting the observation must follow the procedures of EPA Method 22. If sources of visible emissions are identified, the permittee must: [OAR 340-218-0050(3)(a)]

- 5.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 4; or
- 5.b. Conduct Modified EPA Method 9 within 24 hours; or
- 5.c. Develop an LRAPA approved fugitive emission control plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
- 5.d. Recordkeeping: The permittee must maintain records of the fugitive emissions surveys including date, time, corrective actions (if necessary), and/or the results of any EPA Method 22 tests or Modified EPA Method 9. Records must be maintained on site for a period of at least five (5) years, and must be provided to LRAPA personnel on request.

Nuisance Conditions

- 6. Applicable Requirement: The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010] This condition is enforceable only by LRAPA.
- 7. Monitoring Requirement: The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A facility representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible, but no later than 5 business days. [OAR 340-218-0050(3)(a)] This condition is only enforceable by LRAPA.
- 8. Applicable Requirement: The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is enforceable only by LRAPA.
- 9. Monitoring Requirement: The permittee must monitor compliance with this applicable requirement using the facility inspections required in Condition 5. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
- 10. Applicable Requirement: 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:
 - 10.a. Conceals an emission of air contaminant which would otherwise violate these rules, or [LRAPA 32-050 (1)]
 - 10.b. Masks the emission of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050 (2)]
- 11. Monitoring Requirement: The permittee must monitor compliance with this applicable requirement using the compliance certifications required in Conditions 65.a and 65.b.iii.. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]

Source Emission Reduction Plan (SERP)

- 12. Applicable Requirement: Source Emission Reduction Plan (SERP) In the event that an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee must take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee must take action when the permittee first becomes aware of such declaration whether through news media or direct contact with LRAPA.
- 13. Monitoring and Recordkeeping: The permittee must maintain a record (log) of air pollution episodes and

emission reduction actions taken and must provide the log to LRAPA on request. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]

Accidental Release Prevention

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

Table 3. Emissions Unit EU-01 Boilers Requirements

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Time Period-Averaging Time	Monitoring Requirements	
						Method	Condition Number
EU-01 Boilers (3)	32-010(4)(a) 32-010(4)(b)	15 & 16	Visible Emissions	40% opacity through Dec. 31, 2019; 20% opacity on or after Jan. 1, 2020	3 min. aggregate in any one hour	VE Periodic Monitoring	17 & 18
	32-020(1)	19	PM	0.10 gr/dscf	Average of 3 one hr. runs	VE Periodic Monitoring, ST	20 and 21.b
	32-008(1)	22	O ₂	Emission Action Level – TACT	Continuously	O&M, Recordkeeping	22
	32-007(1)	23	PCD O&M	Highest Efficiency & Effectiveness	Minimum once per year	Inspect & Maint., Recordkeeping	23
	40 CFR 241.3	25	Fuel Use	Biomass	NA	NA	NA
	40 CFR Part 63, Subpart 6J (Area Source Boiler NESHAP)	26, 27 & 31	HAP	Biennial Tune-up and Energy Assessment	Biennially	Biennial Tune-up records	27

15. Applicable Requirement: For wood-fired boilers that existed prior to June 1, 1970 (EU-01 Boilers), the permittee must not cause or allow to be emitted any visible emissions that equal or exceed: [LRAPA 32-010(4)]
- 15.a. An average of 40 percent opacity for a period or periods aggregating more than three minutes in any one hour through December 31, 2019.
 - 15.b. An average of 20 percent opacity for a period or periods aggregating more than three minutes in any one hour on or after January 1, 2020, with one or more of the following exceptions:
 - 15.b.i. Visible emissions may equal or exceed 20 percent opacity but may not equal or exceed 40 percent opacity, as the average of all three-minute aggregate periods during grate cleaning operations provided the grate cleaning is performed in accordance with the LRAPA-approved grate cleaning plan;
 - 15.c. For all visible emission standards in this section, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 203B reading represents 15 seconds of

- time. Three-minute aggregate periods are measured by: [LRAPA 32-010(2)]
- 15.c.i. EPA Method 203B;
 - 15.c.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
 - 15.c.iii. An alternative monitoring method approved by LRAPA that is equivalent to EPA Method 203B.
16. **Applicable Requirement:** The permittee must conduct grate cleaning of the wood or biomass-fired boilers (EU-01) in accordance with the LRAPA-approved grate cleaning plan on file with LRAPA. The plan must be kept onsite and be made available upon request. The LRAPA-approved plan includes the following required elements: [LRAPA 32-010(4)(b)(A)]
- 16.a. Expected frequency of grate cleaning;
 - 16.b. Frequency of Modified EPA Method 9 tests during grate cleaning;
 - 16.c. Expected length of grate cleaning period; and
 - 16.d. Methods to minimize emissions during grate cleaning.
17. **Grate Cleaning Monitoring and Recordkeeping Requirement(s):** The permittee must maintain a log of grate cleaning for wood or biomass-fired boilers that includes the date, time and duration of grate cleaning and a log of results of all Modified EPA Method 9 tests performed on the boilers during grate-cleaning operations. The logs must be kept onsite and be made available upon request. [OAR 340-218-0050(3)(a)]
18. **Visible Emissions Monitoring and Recordkeeping Requirement(s):**
The permittee must monitor visible emissions from each stack of EU-01-Boilers by conducting a Modified EPA Method 9 test (see definition on page 5 of this permit). Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 15 is documented, whichever period is shorter. The permittee must maintain records of the results of all Modified EPA Method 9 tests performed on the boilers in EU-01 in accordance with the following schedule:
- 18.a. The Modified EPA Method 9 tests must be conducted at least once each week on EU-01.
 - 18.b. If 6 consecutive weeks of Modified EPA Method 9 test results are less than the standard in Condition 15, the test frequency may be monthly.
 - 18.c. If 4 consecutive months of Modified EPA Method 9 test results are less than the applicable standard in Condition **15.b**, the test frequency may be quarterly.
 - 18.d. If any test result exceeds the applicable standard in Condition **15**, the test frequency must be daily for 5 consecutive days following the exceedance. If the results of the daily tests are all less than the applicable standard in Condition 15, the test frequency must be the same as before the exceedance occurred.
 - 18.e. If, on a regularly scheduled test day, it is not possible to conduct a Modified EPA Method 9 test due to inclement weather conditions or interference from other fugitive sources, the permittee must make three attempts during the day at approximately 10 a.m., noon, and 2 p.m. If it is still not possible to conduct the test, the permittee must perform the test the following day. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day.
 - 18.f. All Modified EPA Method 9 tests must be performed during periods that EU-01 Boilers, to which the opacity standards apply, are in operation.
19. **Applicable Requirements:** For fuel burning equipment sources installed, constructed, or modified before June 1, 1970 (EU-01 Boilers), 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 the following limits: [LRAPA 32-020(1), and (5)]
- 19.a. 0.10 grains per dry standard cubic foot provided that all representative compliance source test

- results collected prior to April 16, 2015 demonstrate emissions no greater than 0.080 grains per dry standard cubic foot;
- 19.b. For purposes of this section, representative compliance source test results are data that was obtained:
- 19.b.i. No more than ten years before April 16, 2015; and
- 19.b.ii. When a source is operating and maintaining air pollution control devices and emission reduction processes at the highest reasonable efficiency and effectiveness to minimize emissions based on the current configuration of the emissions unit and pollution control equipment.
- 19.c. Compliance with the emission standard in Condition 19.a is determined using DEQ Method 5, or an alternative method approved by LRAPA.
- 19.c.i. For fuel-burning equipment that burns biomass fuel alone (EU-01 Boilers) or in combination with any other fuel, the emissions are corrected to 12% CO₂.
20. Monitoring Requirement(s):
Monitoring of compliance with the particulate emission standard in Condition 19.a pertaining to emissions unit EU-01 must be conducted using the visible emission monitoring requirements in Condition 18. [35-0120 and OAR 340-218-0050(3)]
- 20.a. If residual oxygen from the boilers in EU-01 is less than or greater than the parameter operating ranges in specified in Condition 22, other than during startup and shutdown, the permittee must take corrective action. [LRAPA 32-008-1]
21. Testing Requirement(s) for EU-01 Boilers:
- 21.a. Unless otherwise specified in this permit, the permittee must conduct all testing required by this permit in accordance with the ODEQ's Source Sampling Manual and the LRAPA-approved pretest plan [LRAPA 35-0120(3)].
- 21.b. Compliance Testing: Particulate Emissions (Combustion)
- 21.b.i. Within eighteen (18) months of permit issuance, the permittee must demonstrate compliance with the particulate emission limits specified in Condition 19.a by conducting a source test for particulate matter at the compliance demonstration point of each biomass boiler in EU-01 Boilers.
- 21.b.ii. Oregon DEQ Method 5 and EPA Methods 1 through 4 must be used for measuring particulate matter from the boilers. Each test run must be a minimum of 60 minutes long with a minimum sample volume of 31.8 dscf. Test results must be reported as grains per dry standard cubic feet (gr/dscf), gr/dscf corrected to 12% CO₂, pounds per hour, and pounds per thousand pounds of steam produced.
- 21.b.iii. Unless otherwise specified by permit condition or LRAPA-approved source test plan, wood or biomass-fired boilers compliance source tests must be performed as follows:
- 21.b.iii.A. Tests must be conducted while the boilers are operating at least 90% of the maximum production capacity for existing equipment and under typical worst-case conditions that generate the highest emissions; or
- 21.b.iii.B. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
- 21.b.iii.C. If the process rate during the test is determined by Condition 21.b.iii.B, the permittee must maintain production records on an hourly basis in addition to any other records that may be required by this permit or an applicable requirement.
- 21.b.iv. Only regular operating staff may adjust the process or emission control device

- parameters during a compliance test and within 2 hours prior to the test. Any operating adjustments made during a compliance test, which are a result of consultation with source testing personnel during the test, may render the source test invalid.
- 21.b.v. During each test run, the permittee must record the following information:
 - 21.b.v.A. As-fired fuel characteristics including moisture content, approximate percentage of bark, species, and percent by weight less than 1/8 inch;
 - 21.b.v.B. Visible emissions as measured in accordance with Modified EPA Method 9 within 30 minutes before, during or after each DEQ Method 5 test run, unless weather conditions are such that it is not possible to read opacity;
 - 21.b.v.C. Steaming rate of each boiler (lbs/hr) as calculated from the combined steam meter (total lbs steam/# of boilers operating), for each boiler operating during the test(s);
 - 21.b.v.D. Boiler excess oxygen (%);
 - 21.b.v.E. Pressure drop across the multiclones during testing (inches of water column); and
 - 21.b.v.F. Estimated percentage by weight of hogged fuel combusted during the test.
 - 21.b.vi. A report, which includes the results of the source test, must be submitted to LRAPA for review and approval within 60 days of completing the source test, unless an alternate submittal date is approved by LRAPA.
- 21.c. Emission Factor verification testing: NO_x, CO, VOC, Hogged-fuel F-Factor (Combustion)
- 21.c.i. Within eighteen (18) months of permit issuance, the permittee must conduct emission factor verification testing by conducting source tests for NO_x, CO and VOC at the compliance demonstration point of each biomass boiler in EU-01. In addition, the permittee must sample and perform fuel analyses of the biomass combusted during the emission factor verification testing on the boilers as specified in Condition 21.c.iii. The permittee must use the following test methods for each emission factor to be verified:
 - 21.c.i.A. EPA Method 7E for NO_x;
 - 21.c.i.B. EPA Method 10 for CO; and
 - 21.c.i.C. EPA Method 25A for VOC (as propane).
 - 21.c.ii. Emissions results must be reported in the units of the emission factors in the PSEL monitoring Condition 49.c.
 - 21.c.iii. To verify the hogged-fuel F-Factor used to calculate greenhouse gas emissions based on EU-01 Boiler steam production, the permittee must collect a representative hogged-fuel composite sample in accordance with 40 CFR 63.7521(c) concurrent with the emission factor verification source testing specified in Condition 21.c.i (above). The permittee must perform ultimate analyses on the hogged-fuel/biomass composite sample using the associated test methods as follows:
 - 21.c.iii.A. Fuel Moisture Content (% wet basis) using ASTM E871-82R06 converted to dry basis;
 - 21.c.iii.B. Fuel Heat Content/High Heat Value/Gross Caloric Value (GCV) (Btu/lb, wet basis) using ASTM E711 converted to dry basis;
 - 21.c.iii.C. Ultimate Fuel Analysis for ash content (% dry basis) using ASTM D1102-84R07; %C & %H (wet basis) using ASTM E777-87R04; %N (wet basis) using ASTM E778-87R04; %S (wet basis) using ASTM E775-87R04 and calculate % O (dry basis) using ash, C, H, N, and S (percentages converted to dry basis) using ASTM E711-82R06;

- 21.c.iii.D. Calculate and report Hogged Fuel F-Factor (dscf/mmBtu) from ultimate analysis (dry basis) and GCV (dry basis) using equation 19-13 in 40 CFR 60 App. A, RM 19;
 - 21.c.iv. During each test run, the permittee must record the following information:
 - 21.c.iv.A. As-fired fuel characteristics including moisture content, approximate percentage of bark, species, and percent by weight less than 1/8 inch;
 - 21.c.iv.B. Average stack gas volumetric flow (dscfm) using EPA Reference Method 2;
 - 21.c.iv.C. Average steaming rate (1000 lbs steam/hr) for individual boilers estimated from common steam gauge on EU-01: Boilers.;
 - 21.c.iv.D. Boiler excess oxygen (%);
 - 21.c.iv.E. Pressure drop across the multiclones during testing; and
 - 21.c.iv.F. Estimated percentage by weight of hogged fuel combusted during the test.
 - 21.c.v. A report, which includes the results of the source test, must be submitted to LRAPA for review and approval within 60 days of completing the source test, unless an alternate submittal date is approved by LRAPA.
- 22. **Parametric and Emission Action Level Monitoring:** The permittee must calibrate, maintain, operate and record the output of a continuous monitoring system (CMS) for measuring the residual oxygen of each boiler in EU-01 in accordance with accepted professional standards. [LRAPA 32-008(1)]
 - 22.a. Real time data must be displayed at least once every minute that the boiler is in operation.
 - 22.b. The permittee must calibrate, maintain, operate and record the output of a steam flow meter on emissions unit EU-01 in accordance with the manufacturer’s written instructions or accepted professional standards if manufacturer’s written instructions are unavailable.
 - 22.c. Residual oxygen must be recorded for each hour of operation.
 - 22.d. If residual oxygen from any boiler in EU-01 is less than or greater than the operating range established below other than during startup and shut down, grate cleaning and/or soot blowing, the permittee must take corrective action.
 - 22.d.i. Boiler #1: 3.3% to 19.2% (3-hour average);
 - 22.d.ii. Boiler #2: 3.3% to 19.2% (3-hour average); and
 - 22.d.iii. Boiler #3: 3.3% to 19.2% (3-hour average).
 - 22.e. Minimum CMS data availability must be 90% for any day, month, and year. Monitoring data availability must be determined excluding periods of calibrations and routine maintenance. Data recorded during periods of CMS breakdowns, repairs, audits, calibration checks, and zero and span adjustments must not be included in the data averages. [DEQ CMM – Appx. C.2(4)]
 - 22.f. All excursions of the residual oxygen parameter operating ranges and the corrective action taken to return the boilers to highest and best practicable treatment and control must be recorded in a boiler operating log.
 - 22.g. A residual oxygen parameter operating range excursion is not necessarily a violation of the particulate matter emission standard.
- 23. **EU-01 Inspection and Maintenance:** At least once each year during a regularly scheduled maintenance outage, the permittee must inspect the pollution control device (multiclones: CD-01.1, CD-01-2, CD-01-3) on each boiler in EU-01 for physical degradation that could affect the performance of the control device, including but not limited to any individual cyclones within the multiclone that are plugged, missing or damaged to the extent they are no longer effective. The results of the inspection and any repair activities must be recorded in a log. [LRAPA 32-007]
- 24. **EU-01 Recordkeeping:**

- 24.a. A monthly record must be maintained of the quantity of steam produced in EU-01.
 - 24.b. The permittee must record in a log the results of inspections and any repair activities performed and maintain records of the number and duration of excursions identified in Condition 22, and corrective actions taken.
 - 24.c. The permittee must record the daily operation activity of each boiler in Boilers EU-01.
25. **EU-01 Boiler Fuel Limitations:** The permittee may only burn *biomass* in boilers EU-01. *Biomass* means any biomass-based solid fuel that is not a solid waste as defined in 40 CFR 241.3. This includes, but is not limited to:
- 25.a. Wood residue and wood products, including trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings and shavings;
 - 25.b. Animal manure, including litter and other bedding materials;
 - 25.c. Vegetative agricultural and silvicultural materials, including logging residues (slash), nut and grain hulls and chaff, bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds.

Area Source Boiler NESHAP (40 CFR 63 Subpart JJJJJ):

26. The permittee must conduct a performance tune-up biennially to demonstrate continuous compliance as follows: (The initial tune-up requirement was conducted March 1, 2014.) [40 CFR 63.11196(a)(1), 63.11201(b), 63.11214(b) and 63.11223(b)(1-7)]
- 26.a. As applicable, inspect the burner and clean or replace any components of the burner as necessary. The burner inspection and inspection of the system controlling the air-to-fuel ratio may be delayed until the next scheduled boiler shutdown, but each burner and system controlling the air-to-fuel ratio must be inspected at least once every 36 months;
 - 26.b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. Any adjustment must be consistent with the manufacturer's specifications for the burner, if available;
 - 26.c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly. The inspection may be delayed until the next scheduled boiler shutdown, but the inspection must be completed at least once every 36 months;
 - 26.d. Measure the exhaust concentration of carbon monoxide (ppmv) and oxygen (%), before and after the adjustments are made. Measurements may be made either on a dry or wet basis, as long as it is the same basis before and after any adjustments are made. Measurements may be taken using a portable CO analyzer;
 - 26.e. Optimize the total emissions of CO (carbon monoxide). This optimization must be consistent with the manufacturer's specifications, if available;
 - 26.f. If the boiler is not operating on the required date for the tune-up, the tune-up must be conducted within 30 days of startup;
 - 26.g. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
27. The permittee must maintain on-site and submit, if requested, reports containing the tune-up information as required in Condition 26, specifically: [40 CFR 63.11223(b)(6) (i) through (iii) and 63.11225(c)(2) (i) and (ii)]
- 27.a. Identification of the boiler, date of tune up, the procedures followed for the tune-up, and the manufacturer's specifications to which the boiler was tuned.
 - 27.b. The CO concentrations in the exhaust in ppmv, and oxygen %, at high fire or typical operating load, before and after the tune-up of the boiler, as detailed in Condition 26.d;
 - 27.c. A description of any corrective actions taken as part of the tune-up;
 - 27.d. The type and amount of fuel used each month over the 12 months prior to the biennial tune-up but only if the unit was physically and legally capable of using more than one type of fuel during that

- period. Units sharing a fuel meter may estimate the fuel use by each unit;
- 27.e. These records must be maintained onsite, in a form suitable for inspection and/or submittal upon request.
28. [Reserved] Condition 28 requirement met. Permittee submitted the Notification of Compliance Status for the “initial” boiler tune-up in accordance with 40 CFR 63.11225(a)(4)(ii) on April 14, 2014.
29. [Reserved] Condition 29 requirement met . Permittee conducted one-time energy assessment of the boiler and its energy use systems on February 5, 2014 in accordance with 40 CFR 63.11214(c), 63.11237 and Table 2 to Subpart JJJJJ of Part 63.
30. [Reserved] Condition 30 requirement met . Permittee submitted the Notification of Compliance Status for the boiler energy assessment in accordance with 40 CFR 63.11225(a)(4)(iii) on April 14, 2014.
31. The permittee must comply with the following, as applicable:
- 31.a. The permittee must prepare a biennial compliance report and include it with the appropriate annual report specified in Condition 65.b.iv.B. The report must include the following: [40 CFR 63.11225(b)]
- 31.a.i. Company name and address;
- 31.a.ii. Statement by a responsible official, with the official’s name, title, phone number, e-mail address, and signature, certifying the truth accuracy and completeness of the notification and a statement of whether the source has complied with all of the relevant standards and other requirements of 40 CFR Part 63, subpart JJJJJ. Your notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official:
- 31.a.ii.A. “This facility complies with the requirements in §63.11223 to conduct a biennial tune-up of each boiler.”
- 31.a.ii.B. For units that do not qualify for a statutory exemption as provided in section 129(g)(1) of the Clean Air Act: “No secondary materials that are solid waste were combusted in any affected unit.”
- 31.a.iii. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of the deviations, the time periods during which the deviations occurred, and the corrective action taken.
- 31.b. Notification 30 days prior to commencing combustion of solid waste including the following information: [40 CFR 63.11225(f)]
- 31.b.i. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will commence burning solid waste, and the date of the notice;
- 31.b.ii. The currently applicable subcategory under 40 CFR Part 63, subpart JJJJJ;
- 31.b.iii. The date on which the boilers became subject to the currently applicable emission limits; and
- 31.b.iv. The date upon which combusting solid waste will commence.
- 31.c. Notification 30 days prior to switching to a fuel(s) that may result in the applicability of a different subcategory or a switch out of 40 CFR Part 63, subpart JJJJJ due to a switch to 100 percent natural gas, including the following information: [40 CFR 63.11225(g)]
- 31.c.i. The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice;
- 31.c.ii. The currently applicable subcategory under 40 CFR Part 63, subpart JJJJJ;
- 31.c.iii. The date on which the boilers became subject to the currently applicable emission

- limits; and
- 31.c.iv. The date upon which the fuel switch will commence.
- 31.d. 40 CFR Part 63 General Provisions according to Table 8 of Subpart JJJJJ, incorporated by reference. [40 CFR 63.11235]
- 31.e. The General Compliance Requirements specified in 40 CFR 63.11205(a) of Subpart JJJJJ are incorporated by reference.

Table 4. Emissions Unit EU-03 (Cyclones & Target Boxes) and EU-04 (Baghouses) Requirements

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
EU-03, EU-04	32-010(2) and 32-010(3)	32	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	33
	32-015(2)(b)	34.b	PM/PM ₁₀	0.14 gr/dscf	VE Periodic Monitoring	33 and 35.b
	32-045	36	PM/PM ₁₀	Process weight rule	VE Periodic Monitoring	33

32. Applicable Requirement: For sources (EU-03 and EU-04), other than wood-fired boilers, the permittee must not cause 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 minutes in any one hour. [LRAPA 32-010(3)]
- 32.a. For all visible emission standards in this section, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 203B reading represents 15 seconds of time. Three-minute aggregate periods are measured by: [LRAPA 32-010(2)]
- 32.a.i. EPA Method 203B;
 - 32.a.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
 - 32.a.iii. An alternative monitoring method approved by LRAPA that is equivalent to EPA Method 203B.
33. Monitoring and Recordkeeping Requirement(s):
 The permittee must conduct a six (6) minute visible emission survey of each emission unit in EU-03 (cyclones and target boxes) and EU-04 (baghouses) with devices with the potential to emit visible air contaminants to the atmosphere using EPA Method 22 for monitoring pertaining to Condition 32. The visible emission surveys may be conducted simultaneously on multiple emission points when they are in the same field of view for the observer. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. Excessive emissions observed using Method 22 are considered to be any visible emissions that leave the emission unit boundaries for more than 5% (18 seconds) of the survey time. The emission unit boundary is defined as the general location on the permittee’s property of the emission unit that includes the emitting device. In addition:

- 33.a. All visible emissions surveys must be conducted during operating conditions that have the potential to create visible emissions (e.g., process is operating under normal, representative conditions).
- 33.b. The permittee must conduct visible emission surveys on EU-03 and EU-04 at least once each month.
- 33.c. If the monthly surveys conducted during four (4) consecutive months do not result in the need for corrective action, the surveys need only be done once per quarter.
- 33.d. If visible emissions are detected at the emission unit boundary for more than 5% (18 seconds) of the survey time, the permittee must take corrective action which includes one of the following (33.d.i or 33.d.ii):
- 33.d.i. For fugitive emissions from emission units the permittee must use water, sweeping, a chemical treatment, or other effective method to minimize the fugitive emissions, unless cold weather would make this activity result in hazardous conditions. Cold weather is defined as weather conditions where ambient temperatures at surface level are expected to be or have been less than 32°F within 12 hours. If water is used to control the fugitive dust emissions, the permittee must take care not to create a water quality problem from surface water run-off.
- 33.d.ii. Modified EPA Method 9 must be used to determine opacity in accordance with ODEQ's *Source Sampling Manual* within 24 hours on the affected monitoring point. Each modified Method 9 observation period must be for a minimum of six (6) minutes unless any one (1) reading is equal to or greater than 20% opacity, in which case the observation period must be for a minimum of 60 minutes or until a violation of the emissions standards identified in Condition 32, or an exceedance of the applicable requirement is documented, whichever is a shorter period. The permittee must record the results of the Modified EPA Method 9 tests.
- 33.d.iii. For emissions units with a baghouse as a control device (EU-3A), the permittee must perform corrective action by checking the condition of the bags and/or performing maintenance on the baghouses.
- 33.e. The permittee must record the corrective action taken or the results of the Modified EPA Method 9 tests on **EU-03 (Cyclones & Target Boxes) and EU-04 Baghouses** per occurrence.
- 33.f. If an exceedance occurs, the survey and/or observation frequency for the affected monitoring point(s) in EU-03 and or EU-04 will start over with the initial frequency specified in Condition 33.b.
- 33.g. If the observer is unable to conduct the survey and/or Modified Method 9 tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow which impair visibility, or darkness, the observer must note such conditions on the data observation sheet and make at least three attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day during daylight hours. If the visible emissions survey and/or test could not be conducted on the regularly scheduled day due to interferences, the observer must conduct the test on the following day.
- 33.h. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each visible emissions survey or Modified Method 9 test.
34. Applicable Requirements: 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 June 1, 1970 but prior to April 16, 2015, (EU-03 (Cyclones & Target Boxes) and EU-04 (Baghouses)), in excess of the following limits: [LRAPA 32-015(1), (2)(b), and (3)]
- 34.a. 0.10 grains per dry standard cubic foot provided that all representative compliance source test results collected prior to April 16, 2015 demonstrate emissions no greater than 0.080 grains per dry standard cubic foot, or;

- 34.b. If any representative compliance source test results prior to April 16, 2015 are 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.
- 34.c. Compliance with the emissions standard in Condition 34.b is determined using:
 - 34.c.i. DEQ Method 5;
 - 34.c.ii. DEQ Method 8, as approved by LRAPA for sources with exhaust gases at or near ambient conditions;
 - 34.c.iii. DEQ Method 7 for direct heat transfer sources; or
 - 34.c.iv. An alternative method approved by LRAPA.
- 34.d. For purposes of this section, representative compliance source test results are data that was obtained:
 - 34.d.i. No more than ten years before April 16, 2015; and
 - 34.d.ii. When a source is operating and maintaining air pollution control devices and emission reduction processes at the highest reasonable efficiency and effectiveness to minimize emissions based on the current configuration of the emissions unit and pollution control equipment.
- 35. Monitoring and Recordkeeping Requirement(s):
 - 35.a. Monitoring of compliance with particulate matter standards in Condition 34 pertaining to emissions units EU-03 and EU-04 must be conducted using the visible emission monitoring requirements in Condition 33. [LRAPA 35-0120 and OAR 340-218-0050(3)]
 - 35.b. **At least weekly**, the permittee must monitor each baghouse pressure drop in EU-04, and initiate corrective action if the pressure drop exceeds the following range in inches of water: [LRAPA 32-007-2, OAR 340-218-0050(3)]
 - 35.b.i. Baghouse #5: 0.1 to 3.8”
 - 35.b.ii. Baghouse #18: 0.1 to 3.8”
 - 35.b.iii. Baghouse #26: 0.1 to 3.8”
 - 35.c. Real-time data must be displayed at least once every minute that each baghouse (#5, #18 and #26) in EU-04 is in operation. Minimum data availability during development of the action levels required by this condition must be 90% for any month. Monitor availability must be determined excluding periods of calibrations and routine maintenance. Data recorded during periods of CMS breakdowns, repairs, audits, calibration checks, and zero and span adjustments must not be included in the data averages. [DEQ CMM – Appx. C.2(4)] [OAR 340-218-0050(3)]
 - 35.d. **EU-03 Recordkeeping:** A monthly record must be maintained of the quantity of material handled (BDT) in emission unit EU-03.
 - 35.e. **EU-04 Recordkeeping:** A monthly record must be maintained of the hours of operation (hours) of each baghouse (#5, #18 and #26) in emission unit EU-04.
- 36. Applicable Requirement: The permittee must not cause or allow the emission of particulate matter in any one hour from any cyclone or target box included in emissions unit EU-03 in excess of the amount shown in Table 1 in LRAPA 32-045, for the process weight allocated to that process. [LRAPA 32-045]
- 37. Monitoring and Recordkeeping Requirement(s):

Monitoring of compliance with process weight limit in Condition 36 pertaining to emissions unit EU-03 must be conducted in accordance with Condition 33.

Table 5. Emissions Unit EU-05 VOC (not listed elsewhere) Requirements

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Condition Number
VOC (not listed elsewhere) EU-05	40 CFR Part 63 NESHAP: Plywood & Composite Wood Products (PCWP)	38	HAP	PCWP MACT	Recordkeeping	39

38. PCWP MACT (Synthetic Minor) Applicable Requirement: The miscellaneous coatings in use must have HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. [40 CFR 63.2241(a)]
39. Monitoring and Recordkeeping Requirement(s):
 The permittee must monitor coating materials used at the facility and maintain records of the current Safety Data Sheet (SDS), Certified Product Data Sheet (CPDS) or material content certification document on-site for each miscellaneous coating used at the facility in accordance with Condition 55.

Table 6. Emissions Unit EU-08 Dry Kilns Requirements

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dry Kilns EU-08	32-010(2) and (3)	40	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	41
	34-016, 42-0080 and OAR 340-218-0050(3)	42	Dry Kiln Temp	< 210 degrees F	Recordkeeping	43

40. Applicable Requirement: For sources (EU-08), other than wood-fired boilers, the permittee must not cause 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 minutes in any one hour. [LRAPA 32-010(3)]
- 40.a. For all visible emission standards in this section, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 203B reading represents 15 seconds of time. Three-minute aggregate periods are measured by: [LRAPA 32-010(2)]
- 40.a.i. EPA Method 203B;
- 40.a.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
- 40.a.iii. An alternative monitoring method approved by LRAPA that is equivalent to EPA Method 203B.
41. Monitoring and Recordkeeping Requirement(s):
 The permittee must monitor visible emissions from emissions unit Dry Kilns EU-08 in accordance with Condition 5.

42. **Applicable Requirement: Synthetic Minor HAP Limit:** Each dry kiln in emissions unit Dry Kilns EU-08 must not exceed a drying temperature of 210 degrees Fahrenheit (°F) when the equipment is in operation, with the exceptions as specified in Conditions 42.a through 42.c: [LRAPA 34-016, 42-0080, OAR 340-218-0050(3)]
- 42.a. The startup and preliminary operation of a new kiln (not to exceed 2 months).
 - 42.b. During an emission related performance test, or
 - 42.c. Tests or studies to verify the emission factor/operating parameter (temperature).
43. **Monitoring and Recordkeeping Requirement(s):**
 The permittee must maintain the high temperature notification system for the kilns, investigate the cause of temperatures greater than 205 degrees F, and take corrective action as necessary. The permittee must monitor and record the board foot volume (MBF) of the lumber dried in the kilns as a twelve-month rolling total, on a wood specific basis.

Table 7. EU-AI Aggregate Insignificant Activities Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring
32-010(2) and (3)	44.a	Opacity	20%	45
32-015(2), 32-020(1)	44.b - 44.e	PM/PM ₁₀ /PM _{2.5}	0.10 gr/dscf	45
32-030(1)&(2)	44.f & 44.g	PM/PM ₁₀ /PM _{2.5}	0.10 gr/dscf	45
32-045	44.h	PM/PM ₁₀	Process weight rule	45
44-230	46 & 47	Gasoline Dispensing	Work Practices & Submerged Fill	46.a - 46.g & 47.a,47.b

44. **Applicable Requirement:** LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in LRAPA Title 12 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 44.a. 32-010(3) – 20% opacity for a period or periods aggregating more than three (3) minutes in any hour for sources other than wood fired boilers.
 - 44.b. 32-015(2)(a)(B) – 0.24 gr/dscf until Dec. 31, 2019 and 0.15 gr/dscf on and after Jan. 1, 2020 for non-fugitive, non-fuel burning equipment installed, constructed, or modified before June 1, 1970 if there are no representative compliance source tests.
 - 44.c. 32-015(2)(b)(B) – 0.14 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 if there are no representative compliance source tests.
 - 44.d. 32-015(2)(c) – 0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified after April 16, 2015
 - 44.e. 32-020(1)(b) – 0.24 gr/dscf until Dec. 31, 2019 and 0.15 gr/dscf on and after Jan. 1, 2020 for fuel burning equipment sources installed, constructed, or modified before June 1, 1970 if there are no representative compliance source tests.
 - 44.f. 32-030(1)(b)&(3)(b) – 0.14 gr/dscf for fuel burning equipment sources installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015 if there are no representative compliance source tests. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.

- 44.g. 32-030(2)&(3)(b) – 0.10 gr/dscf for fuel burning equipment sources installed, constructed, or modified after April 16, 2015. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
- 44.h. 32-045 – process weight limit for non-fugitive, non-fuel burning process equipment.
- 45. Testing, Monitoring, and Recordkeeping Requirements: Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in LRAPA Title 12 and perform the testing in accordance with the DEQ’s *Source Sampling Manual*.

Gasoline Dispensing Facility (GDF) Requirements [LRAPA 44-230]

- 46. Work Practice Requirements: The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to, the following:
 - 46.a. Minimize gasoline spills;
 - 46.b. Do not top off or overfill vehicle tanks or gas cans. If a person can confirm that a vehicle tank is not full after the nozzle clicks off, such as by the vehicle’s fuel tank gauge, the person may continue to dispense fuel using best judgement and caution to prevent a spill;
 - 46.c. Post a sign at the GDF instructing a person filling up a motor vehicle to not top off vehicle tanks;
 - 46.d. Clean up spills as expeditiously as practicable;
 - 46.e. Cover all gasoline storage tank 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;
 - 46.f. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators; and
 - 46.g. Ensure cargo tanks unloading at the GDF comply with Conditions, and. [LRAPA 44-230(1)&(7)] This condition is enforceable only by LRAPA
- 47. Submerged Fill Requirements: The permittee must not transfer or allow the transfer of gasoline into any storage tank (GDF tank 4,000 gal. capacity) with a capacity of 250 gallons or more unless the tank is equipped with submerged fill pipe.
 - 47.a. Submerged fill pipes installed on or before 11/09/06, must be no more than 12 inches from the bottom of the storage tank.
 - 47.b. Submerged fill pipes installed after 11/09/06, must be no more than 6 inches from the bottom of the storage tank.

PLANT SITE EMISSION LIMITS

48. The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0035 through 42-0041]

Table 8. Plant Site Emission Limits (PSELs)

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)	Emission Reduction Credit (tons/yr)
PM	178	66	0
PM ₁₀	171	73	0
PM _{2.5}	123	19	0
CO	274	126	0
NO _x	181	2	0
SO ₂	39	0	0
VOC	230	0	0
Single HAP	9	NA	NA
Combined HAPs	24	NA	NA
GHGs	81,740	NA	NA

- 48.a. The permittee may only use Unassigned Emissions after any necessary construction (OAR 340-218-0190) and operating permit applications (OAR 340-218-0130 through 340-218-0180) have been approved by LRAPA. The permittee is not required to pay emission fees for the unassigned emissions.
 - 48.b. Upon the next permit renewal, the unassigned emissions will be reduced to no more than the SER for each regulated pollutant. [LRAPA 42-0055(5)]
 - 48.c. The facility currently has no Emission Reduction Credits (ERC). Emission reduction credits may be used for internal facility use only after any necessary construction (OAR 340-218-0190) and operating permit applications (OAR 340-218-0130 through 340-218-0180) have been approved by the LRAPA.
49. Monitoring Requirement: [OAR 340-218-0050(3)]
By the 15th working day of each month, the permittee must determine compliance with the Plant Site Emission Limits established in Condition 48 of this permit by conducting monitoring and calculations in accordance with the following procedures, test methods, and frequencies for all pollutants except for GHGs. GHG emissions must be calculated in accordance with OAR 340-215 and reported in accordance with Condition 62:
- 49.a. The permittee must monitor and maintain records of the following process parameters: [OAR 340-218-0050(3)]

Table 9. Process Parameter Monitoring

Process Parameter	Emissions Unit(s)	Units	Measurement Technique	Measurement Frequency
Boiler Steam Produced	EU-01	1000 lbs steam/mo.	Recordkeeping	Monthly
By-product Material Handled (BDT)	EU-02	Bone dry tons/month	Recordkeeping	Monthly
Uncontrolled Cyclone & Target Box Throughput (BDT)	EU-03	Bone dry tons/month	Recordkeeping	Monthly
Baghouse Throughput	EU-04	Bone dry tons/month	Recordkeeping	Monthly
VOC/HAP containing materials usage: adhesive, paint, ink, sap stain treatment, & epoxy	EU-05	Gallons or pounds	Recordkeeping	Monthly
VOC/HAP containing materials density	EU-05	pounds/gallon	Recordkeeping	Maintain current information at all times
VOC containing materials usage	EU-05	% by weight	Recordkeeping	Maintain current information at all times
HAP containing materials usage	EU-05	% by weight	Recordkeeping	Maintain current information at all times
Lam Press Face Adhesive	EU-05	Pounds used/mo.	Recordkeeping	Monthly
Lam Press Finger-Joint Adhesive	EU-05	Pounds used/mo.	Recordkeeping	Monthly
Lumber Dried in Kilns	EU-08	MBF Doug Fir/mo. MBF Hemlock/mo.	Recordkeeping	Monthly

49.b. The permittee must calculate emissions each month for the preceding 12 consecutive calendar months using the following formula, process parameters, and emission factors:

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

where:

- E = Pollutant emissions in lbs/month and tons/yr;
- \sum = Symbol representing “summation of”;
- P_{eu} = Process parameter identified in the table below;
- EF_{eu} = Emission factor identified for each emissions unit and pollutant in the table below;
- K = Conversion constant: 1 lb/lb for daily and monthly emissions calculations; 1 ton/2,000 lbs for annual emissions calculations.

49.c. The permittee must use the following emission factors for calculating emissions:

Table 10. Emission Factors to Be Used for Calculating Emissions

Emissions Unit(s)	Pollutant	Process Parameters	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					No	Yes	Testing Method
Boilers EU-01	PM	Steam Produced	0.316	lbs/Mlb	No	NA	NA
	PM ₁₀	Steam Produced	0.300	lbs/Mlb	Yes	ODEQ Method 5	Once/term within 18 months of permit issuance
	PM _{2.5}	Steam Produced	0.253	lbs/Mlb	No	NA	NA
	CO	Steam Produced	0.8	lbs/Mlb	Yes	EPA Method 10	Once/term within 18 months of permit issuance
	NO _x	Steam Produced	0.528	lbs/Mlb	Yes	EPA Method 7E	Once/term within 18 months of permit issuance
	SO ₂	Steam Produced	0.014	lbs/Mlb	No	NA	NA
	VOC (as propane)	Steam Produced	0.190	lbs/Mlb	Yes	EPA Method 25A	Once/term within 18 months of permit issuance
	Single HAP-Methanol*	Steam Produced	0.00226	lbs/Mlb	No	NA	NA
	Total HAP	Steam Produced	0.0353	lbs/Mlb	No	NA	NA

Emissions Unit(s)	Pollutant	Process Parameters	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					No	NA	NA
Plantsite Fugitives EU-02	PM	Material Handled	0.25	Lb/BDT	No	NA	NA
	PM ₁₀	Material Handled	0.25	Lb/BDT	No	NA	NA
	PM _{2.5}	Material Handled	0.125	Lb/BDT	No	NA	NA
Cyclones EU-03	PM	Material Throughput	0.5	lb/BDT	No	NA	NA
	PM ₁₀	Material Throughput	0.425	lb/BDT	No	NA	NA
	PM _{2.5}	Material Throughput	0.25	lb/BDT	No	NA	NA
Target Boxes EU-03	PM	Material Throughput	0.1	lb/BDT	No	NA	NA
	PM ₁₀	Material Throughput	0.085	lb/BDT	No	NA	NA
	PM _{2.5}	Material Throughput	0.050	lb/BDT	No	NA	NA
Baghouse #18 EU-04	PM/PM ₁₀ /PM _{2.5}	Sanderdust,	0.04	lb/BDT	No	NA	NA
Baghouses #5 & #26 EU-04	PM/PM ₁₀ /PM _{2.5}	Sawdust & Shavings	0.001	lb/BDT	No	NA	NA
VOC EU-05	VOC, Total HAP, Single HAP* (Mass Balance)	Paint, Ink, sap stain treatment & epoxy usage	100%	lb/lb	No	NA	NA
VOC EU-05	VOC (by weight)	Lam Face Adhesive	0.00106	Lb/lb adhesive	No	NA	NA
	Total HAP	Lam Face Adhesive	0.00017	Lb/lb adhesive	No	NA	NA
	Single HAP*	Lam Face Adhesive	0.00014	Lb/lb adhesive	No	NA	NA
	VOC (by weight)	Lam Finger Joint Adhesive	0.01320	Lb/lb adhesive	No	NA	NA
	Total HAP	Lam Finger Joint Adhesive	0.01320	Lb/lb adhesive	No	NA	NA
	Single HAP*	Lam Finger Joint Adhesive	0.01312	Lb/lb adhesive	No	NA	NA
Dry Kilns EU-08	PM/PM ₁₀ /PM _{2.5}	D-fir Lumber Dried	0.02	Lb/MBF	No	NA	NA
	PM/PM ₁₀ /PM _{2.5}	Hemlock Lumber Dried	0.05	Lb/MBF	No	NA	NA

Emissions Unit(s)	Pollutant	Process Parameters	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					No	NA	NA
	VOC	D-Fir Lumber Dried	0.97	Lb/MBF	No	NA	NA
	VOC	Hemlock Lumber Dried	0.28	Lb/MBF	No	NA	NA
	Total HAP	Lumber Dried, Doug Fir	0.146	Lb/MBF	No	NA	NA
	Single HAP*	Lumber Dried, Doug Fir	0.069	Lb/MBF	No	NA	NA
	Total HAP	Lumber Dried, Hemlock	0.195	Lb/MBF	No	NA	NA
	Single HAP*	Lumber Dried, Hemlock	0.0605	Lb/MBF	No	NA	NA

*Methanol is the highest single HAP emitted by the facility

- 49.d. The emissions factors listed in Condition 49.c are not enforceable limits unless otherwise specified in this permit.
- 49.e. Compliance with PSELS must be determined using the calculations contained in Condition 49.b. using the monitored parameters recorded during the reporting period (See Condition 49.a) and the emission factors contained in Condition 49.c, unless the permittee elects to pay emission fees based on actual emissions using a verified emission factor determined in accordance with OAR 340-220-0170. If the permittee is paying on actual emissions based on a verified emission factor, the verified emission factor must be used for determining compliance with the PSEL in accordance with Condition 53.

EMISSION FEES

- 50. Emission fees will be based on the Plant Site Emissions Limits, unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. [OAR 340-220-0090]

GENERAL TESTING REQUIREMENTS

- 51. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ’s Source Sampling Manual. [LRAPA 35-0120(3)]
 - 51.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the DEQ’s Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
 - 51.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating

- adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
- 51.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
- 51.c.i. at least 90% of the design capacity for new or modified equipment;
 - 51.c.ii. at least 90% of the maximum operating rate for existing equipment; or
 - 51.c.iii. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
- 51.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 51.e. Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to LRAPA within 30 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Monitoring Requirements:

52. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
53. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
54. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(a)(G)]

General Recordkeeping Requirements

55. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
- 55.a. The date, place as defined in the permit, and time of sampling or measurements;
 - 55.b. The date analyses were performed;
 - 55.c. The company or entity that performed the analyses;
 - 55.d. The analytical techniques or methods used;
 - 55.e. The results of such analyses;
 - 55.f. The operating conditions as existing at the time of sampling or measurement; and
 - 55.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drifts).
56. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10%

- of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [LRAPA 34-016, and OAR 340-214-0114 and 340-218-0050(3)(b)]
57. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(b)(C)]
58. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. [LRAPA 34-016 and OAR 340-218-0050(3)(b)(B)]

REPORTING REQUIREMENTS

General Reporting Requirements

59. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [LRAPA Title 36]
- 59.a. Immediately (within 1 hour of the event) notify LRAPA of an excess emission event by phone, e-mail, or facsimile; and
- 59.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025(1)]
- 59.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
- 59.b.ii. The date and time the owner or operator notified LRAPA of the event;
- 59.b.iii. The equipment involved;
- 59.b.iv. Whether the event occurred during startup, shutdown, maintenance, or as a result of a breakdown, malfunction, or emergency;
- 59.b.v. Steps taken to mitigate emissions and corrective action taken;
- 59.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or a best estimate, supported by operating data and calculations;
- 59.b.vii. The final resolution of the cause of the excess emissions; and
- 59.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to 36-040.
- 59.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Emergency Response System (OERs). The current number is 1-800-452-0311.
- 59.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
- 59.e. Once LRAPA approves startup/shutdown procedures, the permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events only if required by permit condition or

if it results in excess emissions. When notice is required by this condition, it must be made in accordance with Condition 59.a.

- 59.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
60. **Permit Deviations Reporting:** The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. “Prompt” means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with Condition 59. [OAR 340-218-0050(3)(c)(B)]
61. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
62. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
63. **Greenhouse Gas Registration and Reporting:** If the calendar year emission rate of greenhouse gases (CO₂e) is greater than or equal to 2,756 tons (2,500 metric tons including both biogenic and anthropogenic), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5). [OAR 340-215-0040]
64. Addresses of regulatory agencies are the following, unless otherwise instructed:
- | | |
|--|---|
| <p>LRAPA
1010 Main Street
Springfield, OR 97477
(541) 736-1056</p> | <p>Enforcement and Compliance Assurance Division
Region 10 (20-C04)
U.S. Environmental Protection Agency
1200 Sixth Avenue, Suite 155
Seattle, WA 98101</p> |
|--|---|

Semi-Annual and Annual Reports

65. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by LRAPA. Six-month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the EPA and two copies to the LRAPA office. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 65.a. The first semi-annual report is due on July 30 and must include the semi-annual compliance certification specified in Condition 66. [OAR 340-218-0080]
- 65.b. The annual report is due on February 15 and must consist of the following:
- 65.b.i. The emission fee report; [OAR 340-220-0100]
 - 65.b.ii. A copy of the excess emission log entries for the reporting period, unless previously submitted in accordance with LRAPA 36-025(1); and where applicable, current procedures to minimize emissions startup, shutdown, or maintenance. [LRAPA 36-025(4)]
 - 65.b.iii. The second semi-annual compliance certification; and [OAR 340-218-0080]
 - 65.b.iv. Other annual reporting requirements:
 - 65.b.iv.A. Annual Greenhouse Gas (GHG) emissions in accordance with

65.b.iv.B. Condition 63. [OAR 340-215-0010(2) and 340-215-0040]
As applicable, the biennial compliance report as specified in
Condition 31.a.

66. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-0080(6)(c)]
- 66.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 66.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
 - 66.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 66.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12 and 40 CFR part 64, occurred; and
 - 66.d. Such other facts as LRAPA may require in order to determine the compliance status of the source.
 - 66.e. Number of Emission Action Level (EAL) excursions under Conditions 22, 35.b and 43 including the corrective action taken.
67. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

NON-APPLICABLE REQUIREMENTS

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

Table 11. Non-Applicable Requirements Summary

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	The boilers were manufactured and installed prior to June 9, 1989.
40 CFR Part 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	These standards do not apply because the Rosboro facility is not a major source of HAP emissions.
63.11196(a)(1), (b), (c), (d); 63.11201(a), (b), (d); 63.11205(b) and (c); 63.11210 (a), (b), (d), (e); 63.11211, 63.11212, 63.11213, 63.11214(a), (d); 63.11220; 63.11221; 63.11222; 63.11223(c); 63.11223(g) , 63.11224, 63.11225(a)(3) and (5), (c)(3), (6), (7), (e); 63.11226	40 CFR Part 63, Subpart JJJJJ Area Source Requirements for Boilers that are Subject to Emission Limits and Operating Limits.	The boilers at the Rosboro facility are not subject to emission limits and operating limits.

KEC/cmw
 3/11/2020

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in the permit must have the meaning assigned to such terms in the referenced regulation.

G2. Reference Materials

Where referenced in this permit, the version of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. Source Sampling Manual; November 15, 2018 - State Implementation Plan Volume 4, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

G3. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the LRAPA Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee must comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance must be supplemental to, and must not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 32-050(2)] This condition is enforceable only by LRAPA.

G6. Credible Evidence

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

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

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

G8. Outdoor Burning [LRAPA Title 47]

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

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0240, and LRAPA 43-015 (LRAPA-only enforceable)]

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

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

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

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

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

- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

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

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

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

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

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

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

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

- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 must not extend to off-permit changes.

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

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

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

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

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

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

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

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

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

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

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

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

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

G21. New Source Review Modification [LRAPA 38-0010]

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

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

ALL INQUIRIES SHOULD BE DIRECTED TO:

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

ATTACHMENT A: Air Pollution Emergencies

Table I

AIR POLLUTION EPISODE: **ALERT CONDITION**

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

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

Part B: Pollution Episode Conditions for Particulate Matter

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

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

Source of Contamination	Control Actions — Alert Level
A. Coal, oil, or wood-fired facilities.	<ol style="list-style-type: none">1) Utilization of electric generating fuels having low ash and sulfur content.2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.3) Diverting electric power generation to facilities outside of Alert Area.
B. Coal, oil, or wood-fired process steam generating facilities.	<ol style="list-style-type: none">1) Utilization of fuel having low ash and sulfur content.2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.

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

Table II

AIR POLLUTION EPISODE: **WARNING CONDITIONS**

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

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

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

- C. No operation of paper coating plants from 2:00 a.m. to 2:00 p.m.
 - D. No architectural painting or auto finishing;
 - E. No venting of dry cleaning solvents from 2:00 a.m. to 2:00 p.m. (except perchloroethylene).
5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.

Part B: Pollution Episode Conditions for Particulate Matter

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

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

Source of Contamination	Control Actions — Warning Level
A. Coal, oil, or wood-fired electric power generating facilities.	<ul style="list-style-type: none"> 1) Maximum utilization of fuels having lowest ash and sulfur content. 2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing. 3) Diverting electric power generation to facilities outside of Warning Area. 4) Prepare to use a plan of action if an Emergency Condition develops. 5) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
B. Coal, oil, or wood-fired process steam generating facilities.	<ul style="list-style-type: none"> 1) Maximum utilization of fuels having the lowest ash and sulfur content. 2) Utilization of mid-day (12: 00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.

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

Table III

AIR POLLUTION EPISODE: *EMERGENCY CONDITIONS*

EMISSION REDUCTION PLAN

1. There shall be no open burning by any person of any material.
2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.
3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture shall immediately cease operation, except the following:
 - A. Police, fire, medical and other emergency services;
 - B. Utility and communication services;
 - C. Governmental functions necessary for civil control and safety;
 - D. Operations necessary to prevent injury to persons or serious damage to equipment or property;
 - E. Food stores, drug stores and operations necessary for their supply;
 - F. Operations necessary for evacuation of persons leaving the area;
 - G. Operations conducted in accordance with an approved preplanned emission reduction plan on file with the Agency.
4. All commercial and manufacturing establishments not included in these rules shall institute such actions as will result in maximum reduction of air contaminants from their operations which emit air contaminants, to the extent possible without causing injury or damage to equipment.
5. The use of motor vehicles is prohibited except for the exempted functions in 3, above.
6. Airports shall be closed to all except emergency air traffic.
7. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces.
8. Any person responsible for the operation of a source of atmospheric contamination listed below shall take all required control actions for this *Emergency Level*.

Source of Contamination	Control Actions — <i>Emergency Level</i>
A. Coal, oil, or wood-fired electric power generating facilities.	<ol style="list-style-type: none"> 1) Maximum utilization of fuels having lowest ash and sulfur content. 2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing. 3) Diverting electric power generation to facilities outside of Emergency area. 4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
B. Coal, oil, or wood-fired steam generating facilities.	<ol style="list-style-type: none"> 1) Reducing heat and steam process demands to absolute necessities consistent with preventing equipment damage. 2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing. 3) Taking the action called for in the emergency plan. 4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
C. Manufacturing industries of the following classifications: <ul style="list-style-type: none"> - Primary Metals Industry - Petroleum Refining Operations - Chemical Industries - Mineral Processing Industries - Paper and Allied Products - Grain Industry - Wood Processing Industry 	<ol style="list-style-type: none"> 1) The elimination of air of contaminants from manufacturing operations by ceasing, curtailing, postponing or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment. 2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances. 3) Maximum reduction of heat load demands for processing. 4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.