



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

REVIEW REPORT

1010 Main St.
 Springfield, OR 97477

Source Information:

SIC	2439
NAICS	321213
Public Notice Category	III

Source Categories (LRAPA Title 37, Table 1)	B.45: Millwork (structural wood members)
---	--

Compliance and Emissions Monitoring Requirements:

Unassigned emissions	Y
Emission credits	NA
Compliance schedule	NA
Source test date	NA

COMS	NA
CEMS	NA
Ambient monitoring	NA

Reporting Requirements

Annual report (due date)	March 15
Emission fee report (due date)	March 15
SACC (due date)	August 30
Quarterly report (due dates)	NA

Monthly report (due dates)	NA
Excess emissions report	Immediately
Other reports	GHG

Air Programs

NSPS (list subparts)	NA
NESHAP (list subparts)	A, DDDD, DDDDD
CAM	Y
Regional Haze (RH)	NA
Synthetic Minor (SM)	NA
Part 68 Risk Management	NA
Title V	Y

ACDP (SIP)	Y
Major HAP source	Y
Federal major source	NA
New Source Review (NSR)	NA
Prevention of Significant Deterioration (PSD)	NA
Acid Rain	NA
Clean Air Mercury Rule (CAMR)	NA

TABLE OF CONTENTS

LIST OF ABBREVIATIONS USED IN THIS REVIEW REPORT.....3
INTRODUCTION4
FACILITY DESCRIPTION4
GENERAL BACKGROUND INFORMATION.....4
EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION5
AGGREGATE INSIGNIFICANT ACTIVITIES7
EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING13
EMISSION LIMITS FOR INSIGNIFICANT ACTIVITIES15
FEDERAL REQUIREMENTS15
CURRENT PLANT SITE PRODUCTION.....19
PLANT SITE EMISSION LIMIT (PSEL) INFORMATION19
UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS20
SIGNIFICANT EMISSION RATE21
HAZARDOUS AIR POLLUTANTS (HAPS)21
STRATOSPHERIC OZONE DEPLETING REQUIREMENTS22
MONITORING REQUIREMENTS22
GENERAL TESTING REQUIREMENTS23
SOURCE TEST RESULTS.....23
RECORDKEEPING REQUIREMENTS23
REPORTING REQUIREMENTS24
COMPLIANCE HISTORY24
PUBLIC NOTICE24
EMISSIONS DETAIL SHEETS26

LIST OF ABBREVIATIONS USED IN THIS REVIEW REPORT

ACDP	Air Contaminant Discharge Permit	MSF	1,000 Square feet 3/8” basis
Act	Federal Clean Air Act	MSDS	Material Safety Data Sheets
ASTM	American Society of Testing and Materials	MeOH	Methanol
BDT	Bone dry ton	NA	Not applicable
BDU	Bone dry unit	NO _x	Nitrogen oxides
BF	Board feet	NESHAP	National Emission Standard for Hazardous Air Pollutant
Btu	British thermal unit	NSPS	New Source Performance Standards
CEMs	Continuous emission monitoring system	NSR	New Source Review
CFR	Code of Federal Regulations	O ₂	Oxygen
CO	Carbon Monoxide	OAR	Oregon Administrative Rules
CO ₂	Carbon Dioxide	ODEQ	Oregon Department of Environmental Quality
CO ₂ e	Carbon Dioxide Equivalent	ORS	Oregon Revised Statutes
CPMS	Continuous parameter monitoring system	O&M	Operation and maintenance
Day	A calendar 24-hour period	PF	Phenol-Formaldehyde
DEQ	Department of Environmental Quality	Pb	Lead
dscf	Dry standard cubic feet	PCD	Pollution Control Device
EF	Emission factor	PM	Particulate matter
EPA	US Environmental Protection Agency	PM ₁₀	Particulate matter less than 10 microns in size
ERC	Emission Reduction Credit	PM _{2.5}	Particulate matter less than 2.5 microns in size
EU	Emissions Unit	ppmv	Parts per million by volume
FCAA	Federal Clean Air Act	ppm	Parts per million
FSA	Fuel sampling and analysis	PSEL	Plant Site Emission Limit
GHG	Greenhouse Gas	psia	Pounds per square inch, actual
gr/dscf	Grain per dry standard cubic foot (1 pound = 7000 grains)	RTO	Regenerative Thermal Oxidizer
HAP	Hazardous Air Pollutant as defined by OAR 244-0040	SCHED	Schedule
HCFC	Halogenated Chloro-Fluoro-Carbons	SERP	Source emissions reduction plan
HCOH	Formaldehyde	SPEC	Special
ID	Identification number	SO ₂	Sulfur dioxide
I&M	Inspection and maintenance	ST	Source test
LRAPA	Lane Regional Air Protection Agency	TPY	Tons per year, (short ton=2000 lbs)
M	1,000	VE	Visible emissions
MM	1,000,000	VMT	Vehicle miles traveled
Month	Calendar month	VOC	Volatile organic compounds
MB	Material Balance	Week	Calendar week starting at 12:01 am on Sunday morning
MBF	1,000 Board feet	Year	A period consisting of any 12-consecutive calendar months

INTRODUCTION

1. The proposed permit is a renewal of Lane Regional Air Protection Agency (LRAPA) Title V Operating Permit No. 208256 that was issued June 2, 2014 and scheduled to expire on June 2, 2019. The existing permit will remain in effect until this renewal is issued.
 - 1.a. Information relied upon: The permit renewal is based upon the renewal application (No. 64034) received May 25, 2018 and supplemental information from an administrative amendment (No. 66260) received June 19, 2020.
2. In accordance with OAR 340-218-0120(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

FACILITY DESCRIPTION

3. The Weyerhaeuser NR Company – Eugene, OR ELP (Eugene ELP) plant receives dry veneer from outside suppliers. In the Laminated Veneer Lumber (LVL) presses, the prepared veneer is subjected to glue, heat, and pressure creating an LVL billet. Some of the LVL billets are transferred to the I-joist department where they are made into flanges for I-joists. Following this I-joist fabrication process, the I-joists are heat cured in an oven. Once cured, they are cut to length and shipped to market. The remaining LVL billets not destined for I-joist flanges are transferred to a secondary manufacturing department in the plant where they are ripped into a variety of widths and lengths for shipment to market as well. Wood residuals are generated throughout the manufacturing process and collected by way of a pneumatic system controlled by baghouses. Pollutants emitted from the manufacturing processes include NO_x, CO, VOC, GHGs, and PM/PM₁₀/PM_{2.5} from gas combustion, VOCs (primarily methanol, formaldehyde, and phenol) from glue curing in the LVL presses and I-joist oven, and PM/PM₁₀/PM_{2.5} from wood residual handling.
4. The facility is located in a topographically flat area. To the north of the facility there is a mixed industrial, commercial and residential area. To the east of the facility is a heavy industrial area, including a chromium plating facility and wood preserving operation. To the south of the facility is a mixed industrial and commercial area. To the west of the facility is a light commercial area and the Randy Papé Beltline (OR 569).

GENERAL BACKGROUND INFORMATION

5. The facility is located inside the Eugene Springfield Air Quality Management Area. The facility is located in an area that has been designated an attainment area for PM_{2.5}, O₃, NO_x, SO₂ and Pb and a maintenance area for CO and PM₁₀.
6. The current permit was issued on June 2, 2014. The following changes to the permit were made at the facility during the last permit term:

Date	Permit Revision or Notification	Explanation
11/24/2014	Issuance of Construction ACDP (Application No. 59538)	Authorization to construct five new 4-ft wide LVL presses and associated equipment, replace six of the existing 2-ft wide presses, and replace or rebuild two remaining 2-ft wide LVL presses. A Construction ACDP was required because the proposed installation resulted in an increase in

Date	Permit Revision or Notification	Explanation
		the VOC PSEL from 55 tons/yr to 67 tons/yr. The increase was not greater than the significant emission rate over the Netting Basis. Changed the facility contact from "Luther (Buck) Thompson" to "Jennifer Barker."
06/01/2015	Addendum No. 1 (Significant Permit Modification, Application No. 60548)	Amendment to incorporate the Construction ACDP issued on November 24, 2014 into the Title V Operating Permit.
11/24/2015	Approval to Construct NC-208256-B15 (AQ 104, Application No. 60958)	Notice of Approval (on AQ 104 form) for an I-joist depth change-over automation project.
06/16/2016	Off-Permit Notification (MD 902, Application No. 61646)	Replacement of the existing Carter Day baghouse #3, BH3, with a new Pop Filter baghouse with the same particulate matter removal efficiency.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

7. The emissions units at this facility are the following:

Emission Unit Description	EU ID	Pollution Control Device	PCD ID
Wood Residual Handling System	WRH	Baghouses 1, 2, & 3	BH-1, BH-2, & BH-3
Laminated Veneer Lumber (LVL) Presses 4, 4-18, 4-19, and 4-20	Presses	None	NA
Future Laminated Veneer Lumber (LVL) Presses (Mill press numbers to be assigned after construction)	Presses	None	NA
Press Heaters	Press Heaters	None	NA
I-Line Process	I-Line	None	NA
I-Line Oven	I-Oven	None	NA
Future Water Shed Overlay	WSO	None	NA
Aggregate Insignificant – includes: Carpentry Shop (PM/PM ₁₀ /PM _{2.5}) Fire Suppression Abort (PM/PM ₁₀ /PM _{2.5}) Misc. Hand Tool Use (PM/PM ₁₀ /PM _{2.5}) Press Lube Emissions (PM/PM ₁₀ /PM _{2.5}) Sawdust Dumpsters (PM/PM ₁₀ /PM _{2.5}) Billet Reclaim Saw (PM/PM ₁₀ /PM _{2.5}) Misc. Inks (VOC) Misc. Adhesive Usage (VOC) Misc. Aerosol Paint Cans (VOC) Misc. Thinner (VOC) Misc. Enamel Paint (VOC)	AI	None	NA

8. Wood Residual Handling System (WRH): The wood residual handling system consists of several material handling cyclones, each of which vents to one of three (3) baghouses: BH-1, BH-2, and BH-3. BH-1 was manufactured by Western Pneumatics with a 8:1 design air to cloth ratio, 630 bags, sweep arm cleaning mechanism, and was installed in 1990. BH-2 was manufactured by Carothers with a 4.8:1 design air to cloth ratio, 460 bags, sweep arm cleaning mechanism, and was installed in 1979. BH-3 was manufactured by Western Pneumatics Inc. with a 5.75:1 design air to cloth ratio, 512 bags, sweep arm cleaning mechanism, and was installed in 2016. The wood residuals are blown to overhead truck bins which emit fugitive particulate when material is transferred to wood residual trucks.
9. Presses 4, 4-18, 4-19, and 4-20 (Presses): Three new, 4-ft wide LVL presses have been installed since starting a press replacement project in the last quarter of 2014. The new presses and their dates of installation are the following: Press 4-18 was installed in 2015, Press 4-19 was installed in 2016, and Press 4-20 was installed in 2017. One of the original presses has remained since the replacement project began. The remaining press is Press 4, which was installed in 2001.
 - 9.a. Future Presses (Press numbers to be assigned after construction): The press replacement project construction began in the last quarter of 2014, with the first LVL press installation beginning in March 2015. Although the original project plan called for the construction/installation of one 4-ft wide LVL press every year and was scheduled for completion in 2019, the current LVL press project plan is to install up to two more presses and is scheduled for completion in 2028. There are two possible installation scenarios for the additional LVL presses. One scenario would be to replace the remaining 2-ft wide LVL press (Press 4) with two, 4-ft wide LVL presses. The other installation scenario would be to install one 4-ft wide LVL press and then rebuild the existing 2-ft wide LVL press (Press 4). Although the total number of presses and their individual widths may vary, the PSELs in the permit are based off 14,927,040 cubic feet of LVL production per year which accounts for this operation variability.
 - 9.b. Removed Presses 1, 2, 3, 5, 7, 8 and 9 (Presses): Press 1 was installed in 2004 and Press 3 was installed in 2000, both of which were removed in March 2020. The following presses, with installation dates, have also been removed as part of the press replacement project: Press 2 installed in 2000, Presses 5 and 8 installed in 2001, and Presses 7 and 9 installed in 1999.
10. Future Water Shed Overlay (WSO): The permit allows for the facility to apply a phenolic resin impregnated paper to the top and bottom of billet surfaces of the LVL that will only be used on headers. This paper and its application on the LVL billets is referred to as water shed overlay (WSO). The WSO is applied at the infeed of the LVL press. Heat and pressure from the press causes the paper to adhere to the wood substrate of the LVL billet.
11. I-Line: Adhesive is applied to web and flange material to manufacture structural I-joists. The process was installed in 1972 and has a maximum rated design capacity of 328,000 pounds of adhesive used per month.
12. Press Heaters: Installed in 2001, the two (2) natural gas-fired process heaters are part of a thermal hot oil system. The name plate on each heater indicates a maximum heat input rate of 9,999,999 Btu/hr, but a specific heat rating provided by the manufacturer (Heatec) in 2013 indicates a specific maximum heat rating of 9.4 MMBtu/hr.
13. I-Line Oven (Oven): Natural gas burners heat the Oven chamber to cure the adhesive in newly manufactured I-joists. The original Oven was installed in 1973 but later replaced in 1981 by a new Oven. The current Oven has two Maxon natural gas burners each with a rated design capacity of 3.8 MMBtu/Hour that both directly fire the Oven. The Oven, including both its burners, is a PCWP MACT affected source.
14. Aggregate Insignificant (EU-AI): Aggregate Insignificant include activities described below (see Item 15 for the estimated emissions associated with each activity):

Carpentry Shop (PM/PM₁₀/PM_{2.5})
 Fire Suppression Abort (PM/PM₁₀/PM_{2.5})
 Misc. Hand Tool Use (PM/PM₁₀/PM_{2.5})
 Press Lube Emissions (PM/PM₁₀/PM_{2.5})
 Sawdust Dumpsters (PM/PM₁₀/PM_{2.5})
 Billet Reclaim Saw (PM/PM₁₀/PM_{2.5})
 Misc. Adhesive Usage (VOC)
 Misc. Aerosol Paint Cans (VOC)
 Misc. Thinner (VOC)
 Misc. Enamel Paint (VOC)
 Misc. Inks (VOC)

AGGREGATE INSIGNIFICANT ACTIVITIES

15. Aggregate insignificant emissions from activities identified by the permittee are detailed in the following table:

Emissions Source	Pollutants (lbs/yr)			
	PM	PM ₁₀	PM _{2.5}	VOC
Misc. Adhesive Usage	NA	NA	NA	0.056
Misc. Aerosol Paint Cans	NA	NA	NA	272
Misc. Thinner	NA	NA	NA	50
Misc. Enamel Paint	NA	NA	NA	0.036
Misc. Inks	NA	NA	NA	100
Carpentry Shop	50	50	50	NA
Press Lube	450	450	450	NA
Miscellaneous Hand Tool Use	50	50	50	NA
Fire Suppression Abort System	365	183	183	NA
Sawdust Dumpsters	25	25	25	NA
Billet Reclaim Saw	50	50	50	NA
Totals	990	808	808	422

16. The following is a list of condition-by-condition changes between the previous permit and the proposed permit:

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
Most	Most	Updated and corrected rule references; Replaced “shall” with “must” in most permit conditions	LRAPA rule changes, typos, etc.
Cover page	Cover page	Updated “Information Relied Upon”; Updated Mill Manager phone number; Removed name of Facility Contact Person retaining only the title of the position	New application for renewal No. 64034; Updated information received; Administrative amendment application No. 66260
List of Abbreviations	List of Abbreviations	Revised definition of Modified EPA Method 9; Incorporated day, week, month and year definitions into list; revised capitalization	Clarity and consistency
1	1	None	None
2	2	Updated condition numbers that are LRAPA only and/or DEQ only enforceable	Rules and conditions have changed
3	3	Updated identification numbers for Existing Presses; Updated Future Press identification numbers as “TBD”; Updated rule citations	Facility provided updated information in renewal application for completed and future presses; 2018 LRAPA rule revisions
Facility-Wide Table	Facility-Wide Table	Updated rule citations; Deleted “Averaging Time” and “Testing Condition” columns to match permit template	2018 LRAPA rule revisions; Clarity and consistency
4	4	Updated rule citation; Added paved road airborne particulate matter precautions	2018 LRAPA rule revisions
5	5	Updated fugitive emission definition; Added LRAPA rule citation	2018 LRAPA rule revisions
6	5.c.	Extracted recordkeeping requirement from list in Condition 5 to isolate as separate condition to match permit template	Clarity and consistency
7	6	Updated rule citation	2018 LRAPA rule revisions
8	--	Added a monitoring requirement for Condition 7 involving an updated nuisance complaint log and investigation guidelines	Clarity and consistency
9	7	Updated particulate fallout language	2018 LRAPA rule revisions
10	--	Added monitoring requirement for Condition 9 that uses the weekly plant survey observations of Condition 5 to establish compliance	Clarity and consistency
11	--	Added applicable requirement to prevent damage or injury to persons or property	Title V permit includes all applicable requirements

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
12	--	Added applicable requirement to prevent means of emissions masking	Title V permit includes all applicable requirements
13	8	Separated the monitoring and recordkeeping requirements; Included rule citations	Clarity and consistency; Lacking citation
14	--	Added applicable requirement to implement emergency actions in the event of an air pollution alert, warning or emergency.	Title V permit includes all applicable requirements
15	--	Added monitoring requirement for Condition 14 utilizing a log of emissions reductions actions	Clarity and consistency
16	9	Included on-specification used oil in Condition 16.a. to match the language in LRAPA 32-065; Removed fuel oil specification in Condition 16.a. and isolated it in Condition 16.b.	Clarity and consistency
17	10	Minor language changes	Clarity and consistency
18	11	None	None
19	12	Updated non-HAP coating definition; Included rule citation for Condition 19.a.	PCWP NESHAP 2020 update; Lacking citation
20	13	None	None
21	14	Removed "initial statement shall be submitted no later than October 30, 2007" language; Added date of when initial notification was received	Date has passed and the initial signed statement was received
22	15	None	None
EU WRH Emissions Limit Table	EU WRH Emissions Limit Table	Updated rule citations; Updated grain loading standard; Updated Process Weight Limit	2018 LRAPA rule revisions; Material throughput updated in permit renewal application
23	16	Updated rule citation; Removed "excluding uncombined water" language	2018 LRAPA rule revisions; Updated rule language
--	17	Deleted language regarding no testing requirements	Condition deemed as informational only
24	18	Included rule citation; Removed "excluding condensed water vapor"; Minor language changes	Lacking citation; Consistency with LRAPA rule updates; Clarity
25	19	Included rule citation	Lacking citation
26	20	Updated rule citation; Added significant digit to the grain loading standard which now reads "0.10 gr/dscf"	2018 LRAPA rule revisions
27	21	Replaced "Magnehelics" with "differential pressure gauge" for breadth; included pressure drop ranges for each baghouse in EU WRH; minor language changes	Clarity and consistency

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
28	22	Revised the particulate matter emission rate from 5.61 lb/hr to 7.00 lb/hr	Process equipment material throughput increased from 3600 lb/hr to 5454 lb/hr through each baghouse as provided in the application for renewal
29	23	Updated rule citation; Removed “excluding uncombined water” language	2018 LRAPA rule revisions; Updated rule language
30	24	Removed “excluding condensed water vapor”; Minor language changes	Consistency with LRAPA rule updates; Clarity
31	26	Updated rule citation; Removed “excluding uncombined water” language	2018 LRAPA rule revisions; Updated rule language
--	27	Deleted language regarding no testing requirements	Condition deemed as informational only
32	28	Included rule citation; Removed “excluding condensed water vapor”; Minor language changes	Lacking citation; Consistency with LRAPA rule updates; Clarity
33	29	NEHSAP DDDDD: Updated all conditions for which the requirement has already been met and included date of compliance; Removed language about electricity production as it is not applicable to the facility; Updated CEDRI reporting language	Initial compliance notification dates have passed, and requirements have been met; Clarity and consistency
34	30	Updated rule citations; Added significant digit to the grain loading standard which now reads “0.10 gr/dscf”	2018 LRAPA rule revisions
35	31	None	None
Annual PSEL Table	Annual PSEL Table	Revised VOC PSEL from 67 tons/year to 66 tons/year due to updated VOC emission factors of I-Oven and Press Heaters	Utilizing current factors in DEQ AQ-EF05 for natural gas combustion
36	32	Revised language to include the expiration of the ERCs, inclusion into Unassigned Emissions and restriction to internal use; Included rule citation	ERCs expired April 2, 2016; Lacking rule citation
37	33	Updated equation to include summation operator limits; Included definition of summation operator limits	Clarity and consistency
PSEL Emission Factor Table	PSEL Emission Factor Table	Updated PM/PM ₁₀ /PM _{2.5} , SO ₂ and VOC emission factors of I-Oven and Press Heaters	Reflect current factors in DEQ AQ-EF05
38	34	None	None
39	35	None	None
40	36	Updated rule citation; Changed test plan submittal timeline to 30 days prior to testing	Clarity and consistency; Matching language in DEQ Source Sampling Manual
41	37	None	None

New Permit Condition Number	Old Permit Condition Number	Description of change	Reason for change
42	38	None	None
43	39	None	None
44	40	Minor language changes	Clarity and consistency
45	41	Included citation; Minor language changes	Lacking citation; Clarity and consistency
46	42	Minor language changes	Clarity and consistency
47	43	Minor language changes	Clarity and consistency
48	44	Updated rule citation	Clarity and consistency
49	45	Expanding condition language into multiple sub-conditions; Included current number for OERS; Language removed regarding relaxed timeline for reporting; Minor language changes	Clarity and consistency
50	46	Minor language changes	Clarity and consistency
51	47	None	None
52	48	Updated EPA mailing address	Address was updated by EPA
53	49	Minor language changes	Clarity and consistency
54	50	Updated LRAPA title reference; Minor language changes	Clarity and consistency
--	51	Deleted language requiring reporting of GHG emissions only after meeting reporting thresholds	Thresholds have been met; Reporting detailed under Condition 53.b.vii
55	52	None	None
General Conditions G1. - G 28.	General Conditions G1. - G28.	Revised based upon permit template and rule changes	Consistency with rules and permit template

17. Categorically Insignificant Activities: The facility has the following categorically insignificant activities:

- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, kerosene, and gasoline, natural gas or propane burning equipment, provided the aggregate expected actual emissions of the equipment identified as categorically insignificant do not exceed the de minimis level for any regulated pollutant, based on the expected maximum annual operation of the equipment. If a source's expected emissions from all such equipment exceed the de minimis levels, then the source may identify a subgroup of such equipment as categorically insignificant with the remainder not categorically insignificant. The following equipment may never be included as categorically insignificant:
 - Any individual distillate oil, kerosene or gasoline burning equipment with a rating greater than 0.4 million Btu/hour;
 - Any individual natural gas or propane burning equipment with a rating greater than 2.0 million Btu/hr;
- Distillate oil, kerosene, gasoline, natural gas or propane burning equipment brought on site for six months or less for maintenance, construction or similar purposes, such as but not limited to generators, pumps, hot water pressure washers and space heaters, provided that any such equipment that performs the same function as the permanent equipment, must be operated within the source's existing PSEL
- Office activities
- Janitorial activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance

- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems.
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Electrical charging station
- Fire Brigade Training
- Fire suppression
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Vacuum sheet stacker vents
- Emissions from wastewater discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site wastewater treatment and/or holding facilities
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads, except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- Health, safety, and emergency response activities
- Oil/water separators in effluent treatment systems
- Combustion source flame safety purging on startup

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING

18. The following sections describe each applicable requirement and monitoring requirement in the permit, with the intent of the condition and a brief discussion of any unique features of the requirement.
 - 18.a. Conditions 1 and 2 are general statements required in and common to all Title V permits issued by LRAPA.
 - 18.b. Condition 3 provides a list of equipment and identification of pollution control devices for the facility.
 - 18.c. Condition 4 is a facility-wide fugitive dust control requirement that allows the permittee to deal with potential fugitive dust problems before they become standard violations. The reasonable precautions can be required without the need to show a violation of 20% opacity for sources where reading opacity is difficult (e.g., dust from traffic on roads).
 - 18.d. Condition 5 is a visible emissions monitoring requirement for demonstrating compliance with the facility-wide fugitive requirements of Condition 4.
 - 18.e. Condition 6 includes the recordkeeping requirements of the VE surveys in Condition 5.
 - 18.f. Condition 7 is a facility-wide condition that prohibits the facility from causing a nuisance and establishes timely response to any complaints that the facility operation may generate.
 - 18.g. Condition 8 is a monitoring requirement for maintaining a log to document complaints received and the facility's responses to complaints to ensure compliance with Condition 7.
 - 18.h. Condition 9 implements the long-standing particulate matter fallout provisions in LRAPA rules.
 - 18.i. Condition 10 is a monitoring and recordkeeping requirement that monitors compliance with Condition 9 by performing periodic visible emission surveys required in Condition 5.
 - 18.j. Condition 11 implements the LRAPA prohibition of discharging emissions that could cause injury or damage to persons or property.
 - 18.k. Condition 12 implements the long-standing LRAPA prohibition of concealment or masking of emissions to avoid otherwise applicable requirements.
 - 18.l. Condition 13 is a monitoring requirement for demonstrating compliance with Conditions 11 and 12 by semi-annual and annual compliance certifications.
 - 18.m. Condition 14 implements emergency actions required of the facility in the event that air quality becomes so unhealthy that facility curtailments are necessary.
 - 18.n. Condition 15 is a monitoring requirement for maintaining a log of air pollution episodes and emission reduction actions taken by the facility's responses to ensure compliance with Condition 14.
 - 18.o. Condition 16 is a fuel requirement detailing the types of fuels that can be utilized at the facility and the sulfur content limits when using fuel oil.
 - 18.p. Condition 17 is a monitoring requirement for obtaining certifications or SDS to verify the sulfur content of each shipment of fuel oil meets the standards in Condition 16.
 - 18.q. Condition 18 is a standard requirement for Title V facilities stating the permittee's responsibility for the 40 CFR 68 accidental release provisions should the facility trigger these requirements.
 - 18.r. Conditions 19 through 22 are the PCWP MACT (40 CFR 63 Subpart DDDD) requirements that apply to the facility's Group 1 Miscellaneous Coating Operations.
 - 18.s. Condition 23 is the opacity requirement for the baghouses (BH-1, BH-2, BH-3) in EU-WRH.

- 18.t. Condition 24 contains visible emissions monitoring requirements to establish compliance with Condition 23.
- 18.u. Condition 25 are the recordkeeping requirements to maintain the records of visual emissions inspections established in Condition 24.
- 18.v. Condition 26 is the grain loading limit for EU-WRH. Condition 27 establishes a CAM parameter range (baghouse pressure drop) that then may be used to determine on-going compliance with particulate matter standards.
- 18.w. Condition 28 contains the particulate matter process weight limit of LRAPA Title 32 that applies to process equipment like the baghouses (BH-1, BH-2, BH-3) in EU-WRH that are used for material handling.
- 18.x. Condition 29 is the opacity requirement for EU-Presses.
- 18.y. Condition 30 contains visible emissions monitoring requirements to establish compliance with Condition 29.
- 18.z. Condition 31 is the opacity requirement for EU-Press Heaters.
- 18.aa. Condition 32 contains visible emissions monitoring requirements to establish compliance with Condition 31.
- 18.bb. Condition 33 contains the process heater NESHAP requirements (40 CFR Subpart DDDDD).
- 18.cc. Condition 34 contains the particulate matter grain loading and opacity limitations that apply to Insignificant Emission Units (IEUs).
- 18.dd. Condition 35 specifies that no testing is required for IEUs but, if tested, requires testing be completed in accordance with standard testing requirements.
- 18.ee. Condition 36 lists the annual (12 consecutive calendar month period) Plant Site Emission Limits (PSELs), Unassigned Emissions and Emission Reduction Credits (ECRs) for the facility.
- 18.ff. Condition 37 contains the monitoring requirements needed to demonstrate compliance with the PSELs in Condition 36.
- 18.gg. Condition 37.a contains the monitoring and recordkeeping requirements for all facility process parameters needed to demonstrate compliance with the PSELs in Condition 36.
- 18.hh. Condition 37.b is the equation used to estimate emissions for PSELs using the production data monitored in Condition 37.a and the emission factors in Condition 37.c.
- 18.ii. Condition 38 is a table of emission factors for use in calculating facility emissions. The factors are to be used in determining PSELs for all operating scenarios. Requirements for emission factor verification testing are also identified.
- 18.jj. Condition 39 specifies that emission fees will be based in the PSELs unless the permittee elects to report on actual emissions for permitted processes/pollutants.
- 18.kk. Condition 40 contains the general testing requirements for source tests at the facility
- 18.ll. Conditions 41 through 43 contain the general monitoring requirements for the facility.
- 18.mm. Conditions 44 through 48 contain the general recordkeeping requirements for the facility.
- 18.nn. Conditions 49 through 52 contain the general reporting requirements for the facility.
- 18.oo. Conditions 53 through 55 contain the specific annual and semi-annual reporting requirements for the facility.
- 18.pp. Condition 56 specifies the non-applicable requirements that could reasonably be considered to apply to the facility.

- 18.qq. The conditions following 56 are general requirements (General Conditions G1-G29) applicable to Title V sources.

EMISSION LIMITS FOR INSIGNIFICANT ACTIVITIES

19. As identified earlier in this Review Report, this facility has insignificant emissions units (IEUs) that included categorically insignificant activities and aggregate insignificant emissions, as defined in LRAPA Title 12 and/or OAR 340-200-0020. For the most part, the standards that apply to IEUs are for opacity (20% limit) and particulate matter (0.10 gr/dscf limit). LRAPA does not consider it likely that IEUs could exceed an applicable emissions limit or standard because IEUs are generally equipment or activities that do not have any emission controls (e.g., small natural gas fired space heaters) and do not typically have visible emissions. Since there are no controls, no visible emissions, and the emissions are less than one (1) ton per year, LRAPA does not believe that monitoring, recordkeeping, or reporting is necessary for assuring compliance with the standards.

FEDERAL REQUIREMENTS

20. The applicability of various federal requirements is as follows:
- 20.a. **Accidental Release:** The source has certified that the facility is not subject to 40 CFR Part 68, which requires a risk management plan for toxic and flammable substances releases.
 - 20.b. **NSPS:** The facility is not currently subject to New Source Performance Standards (40 CFR Part 60). The press heaters are not included in the definition of a boiler under the NSPS Subpart Dc regulations and are rated at less than 10 MMBtu/hr. In addition, both process heaters each have a maximum heat input value rating of less than 10 MMBtu/hour (9.4 MM Btu/hour as per manufacturer).
 - 20.c. **NESHAP/MACT:** The following National Emissions Standards for Hazardous Air Pollutants (NESHAP), 40 CFR Part 63, requirements are applicable to this facility:
 - 20.c.i. Plywood and Composite Wood Products (Subpart DDDDD) is applicable to this facility and all requirements have been incorporated into the permit. The permittee complied with these requirements by October 1, 2007. The initial notification for this NESHAP was submitted on January 20, 2005. The cost of the new 4-ft wide LVL press project exceeds the 50% cost of a comparable new source and it is technologically feasible for the facility to meet the standards, therefore the facility will become a reconstructed source and is subject to the PCWP requirements for new sources. The requirements for the reconstructed source are the same as currently apply to the existing facility, which is the use of exclusively non-HAP coatings.
 - 20.c.ii. Boilers and Process Heaters (Subpart DDDDD) is applicable to emissions units Press Heaters, each of which is rated at less than 10 MMBtu/hour heat input. The notification requirements were satisfied on January 30, 2009 and January 26, 2012, with a revision on December 10, 2013. The NESHAP requirements that are applicable to the existing press heaters at the facility are identified in the following table:

40 CFR Part 63, Subpart DDDDD citation	Description	Applicable to source (yes/no)	Comments	Permit condition
63.7480	Purpose	No	Informational	NA
63.7485	Subpart applicability	Yes	The press heaters are included in the definition of 'process heater' and the facility	33

40 CFR Part 63, Subpart DDDDD citation	Description	Applicable to source (yes/no)	Comments	Permit condition
			is or has the potential to be a major source of HAPs	
63.7490	Affected source	Yes	(a)(2), (b), (c), and (e) are not applicable	33.a
63.7491	Exempt boilers and process heaters	No	There are no boilers at the facility and no process heaters at the facility that are exempt from the requirements	NA
63.7495	Compliance Dates	Yes, for existing process heaters	(a), (c), (e), (f), and (g) do not apply	33.a
63.7499	Subcategories	Yes	The press heaters are in the 'units designed to burn gas 1 fuels'	33.a
63.7500(a)	Emission limits, work practice standards and operating limits	Yes	Table 1 does not apply to existing process heaters. Table 2 does not apply to existing process heaters designed to burn 'gas 1' fuels (natural gas). Table 3 contains the work practice standards that apply to the existing process heaters. All other emission limits in Tables 11 through 13 are not applicable.	33.b., 33.c
63.7500(b)	Alternative work practice standards	No	Facility has not requested EPA approve use of alternative work practice standards	NA
63.7500(c)	Limited-use boilers and process heaters	No	The process heaters are not included in the 'limited-use' category definition.	NA
63.7500(d)	Tune-up every 5 years	No	The process heaters at the facility are greater than 5 million Btu per hour and do not burn the fuels in the listed subcategories	NA
63.7500(e)	Tune-up every 2 years	Yes	Clarifies that the process heaters at the facility that are designed to burn gas 1 fuels are not subject to emission limits in Tables 1 and 2 or 11 through 13, or the operating limits in Table 4. Specifies that the process heaters at the facility are subject to biennial tune ups since the heat input rating is "less than 10 MMBtu/hour".	33.b
63.7500(f)	Standards apply at all times	No	No standard applies to existing process heaters in the gas 1 fuel subcategory.	NA
63.7501	Affirmative defense	No	This section is not applicable because the process heaters are not subject to an emission limit	NA
63.7505	General requirements for complying with the subpart	Yes	Sub-sections (c) and (d) are not applicable because the process heaters are not subject to emission limits	33.d
63.7510	Initial compliance requirements	Yes	Sub-section (e). Other sections do not apply since the process heaters are not in those fuel categories, are not new process heaters and/or have not ever combusted solid waste	33.a, 33.b, 33.c
63.7515	Subsequent source tests, fuel analyses, or tune-ups	Yes	Sub-section (d) tune-up frequency. All other sections do not apply because the process	33.b

40 CFR Part 63, Subpart DDDDD citation	Description	Applicable to source (yes/no)	Comments	Permit condition
			heaters do not have emission limits and/or are not in the subcategory	
63.7520	Stack test procedures	No	Performance testing is not required since the process heaters do not have emission limits	NA
63.7521	Fuel analyses, fuel specification, and procedures	No	Fuel analyses, etc. are not required for process heaters combusting 'gas 1' fuels.	NA
63.7522	Emission averaging	No	The process heaters are not subject to an emission limit	NA
63.7525	Monitoring, installation, operation, and maintenance requirements	No	The process heaters are not subject to an emission limit and are not required to monitor pollutant data or process parameters	NA
63.7530	Initial compliance with emission limitations, fuel specifications and work practice standards	Yes	Sub-sections (d) and (e). All other sub-sections do not apply because the process heaters are not subject to an emission limit	33.g, 33.h
63.7533	Use of efficiency credits	No	Process heaters are not subject to emission limits and do not use emission and/or efficiency credits	NA
63.7535	Minimum of monitoring data	No	This section is not applicable because the process heaters are not subject to an emission limit with associated monitoring.	NA
63.7540	Continuous compliance demonstration for emission limits, fuel specifications and work practice standards	Yes	Sub-section (a)(11). All other sub-sections are not applicable because the facility does not have the equipment, and/or is not in the specified fuel subcategory and/or subject to an emission limit.	33.b
63.7541	Continuous compliance under the emission averaging provision	No	This section is not applicable because the process heaters are not subject to an emission limit.	NA
63.7545	Notification requirements	Yes	Sub-sections (b), (c), and (d), are not applicable because the press heaters are existing process heaters without an emission limit and/or stack testing requirements.	33.f
63.7550	Reporting	Yes	Sub-section (d) through (g) are not applicable because the press heaters are existing process heaters without an emission limit and/or stack testing requirements. Sub-section (h)(3) applies and requires compliance reports be submitted electronically to EPA through their Central Data Exchange (CDX).	33.e, 33.i
63.7555	Recordkeeping	Yes	Sub-section (b) through (g) are not applicable because the press heaters are existing process heaters without an emission limit and/or stack testing requirements.	33.j

40 CFR Part 63, Subpart DDDDD citation	Description	Applicable to source (yes/no)	Comments	Permit condition
63.7560	Form and duration of recordkeeping	Yes		33.i
63.7565	Part 63 General Provisions	Yes	See Table 10 of subpart DDDDD to determine what general provisions apply to the facility.	NA
63.7570	Who implements standard	No	LRAPA is responsible for implementation of the standard.	NA
63.7575	Definitions	Yes		33

20.d. **Compliance Assurance Monitoring (CAM):** The facility is subject to the provisions of 40 CFR Part 64 – Compliance Assurance Monitoring (CAM) because of its classification as a Title V facility, and because of control equipment, emission limitations and pre-control emissions at or above Title V major source levels at one (1) or more pollutant-specific emissions units. CAM applies to the baghouses in emissions unit (EU) Waste Residual Handling (WRH) for particulate matter. The permit includes CAM requirements for the applicable units and/or control devices. The following table evaluates CAM applicability for all emission units:

Emission Unit	Uses a Control Device for a Regulated Pollutant	Pollutant	Uncontrolled Potential Emissions Exceed Major Source Threshold	Emission Limitation or Standard Applies for this Pollutant	Subject to CAM for the Pollutant
EU-WRH	Yes	PM	Yes	Yes	Yes
EU-Presses	No	--	--	--	NA
EU-I-Line	No	--	--	--	NA
EU-I-Oven	No	--	--	--	NA
EU-Press Heaters	No	--	--	--	NA
EU-WSO	No	--	--	--	NA

20.d.i. The pressure drop across the baghouses must be recorded daily whenever EU-WRH is in operation. The facility is required to take corrective action if the weekly average pressure drop across the baghouses is outside the normal operating ranges detailed in the permit. Monthly external inspections must be conducted of the baghouses and associated ductwork for structural integrity, corrosions, and air leaks. Records must be maintained of all parameters monitored, excursions, corrective actions taken, and monthly inspection and maintenance activities.

CURRENT PLANT SITE PRODUCTION

21. The plant can be operated as much as 24 hours per day, 7 days per week, and 52 weeks per year. The production rates used as a basis for determining the PSELs are as follows:

Production or Process Parameter	Period	Rate	Units
LVL production and wood I-Joist production	LVL Production	14,927,040	cu ft/yr
	LVL Adhesive usage	41,795,712	lbs/yr
	I-line Adhesive usage	3,147,756	lbs/yr
	WSO Process	2,000,000	cu ft/yr

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION

22. Provided below is a summary of the baseline emissions rate, netting basis, plant site emission limit, and emissions capacity.

Pollutant	Baseline Emission Rate (tons/yr)	Netting Basis		Plant Site Emission Limit (PSEL)			PTE (tons/yr)
		Previous (tons/yr)	Proposed (tons/yr)	Previous PSEL (tons/yr)	Proposed PSEL (tons/yr)	PSEL Increase Over Netting Basis (tons/yr)	
PM	23	23	23	24	24	1.2	4.3
PM ₁₀	22	22	22	14	14	-7.6	2.3
PM _{2.5}	NA	14	13	9	9	-4.4	1.4
CO	1.2	1.2	1.2	99	99	98	6.6
NO _x	5.7	5.7	5.7	39	39	33	7.8
SO ₂	<0.5	<0.5	<0.5	--	--	--	--
VOC	53	53	53	67	66	13	66
GHG	4,146	4,146	4,146	74,000	74,000	69,854	9,356

- 22.a. The baseline emission rates for PM, PM₁₀, CO, NO_x, SO₂, and VOC were determined in previous permitting actions and there are no changes. The baseline emission rates are based upon actual estimated emission totals for the 1977 calendar year. Emissions are accounted from WRH, two (2) veneer dryers, one (1) oven, truck loading fugitives, three (3) presses, an I-line process, and aggregate insignificant activities. The detail sheets attached to this report contain the rates, factors and more information about the calculations. A baseline emission rate is not required for PM_{2.5} in accordance with the definition of “baseline emission rate” in LRAPA Title 12.
- 22.b. The GHG baseline emission rate is based upon actual anthropogenic emissions from the 2005 calendar year and accounts for I-line oven and Press Heaters’ natural gas combustion. Compliance with the GHG PSEL is provided by way of the annual reporting required by OAR 340 division 215, as applicable.
- 22.c. The PSEL for PM_{2.5} is established using the procedure specified in the definition of “netting basis” in LRAPA Title 12 (see detail sheets). The PM_{2.5} netting basis has been updated in this permit

renewal to reflect a recalculation of the PM_{2.5}/PM₁₀ ratio, which is also provided in the detail sheets.

- 22.d. The PSEL for PM, PM₁₀, CO, NO_x, and GHG are established at the generic PSEL level in accordance with Section 42-0041(1) of the LRAPA PSEL rules. No PSEL has been established for SO₂ because the facility emissions are below de minimis levels as defined in LRAPA Title 12.
- 22.e. The VOC PSEL is established (66 ton/yr) using the highest VOC content historically used in the adhesive and the EU-Presses projected production capacity for the 4-foot wide LVL press project. The VOC PSEL was reduced by one (1) ton per year in this permit renewal due to updated VOC emission factors (DEQ AQ-EF05) for natural gas combustion in EU-Press Heaters and EU-I-Line Oven.

UNASSIGNED EMISSIONS AND EMISSION REDUCTION CREDITS

- 23. The facility has Unassigned Emissions as shown below. The facility had Emission Reduction Credits (ERCs) that were established in the previous permitting term, which expired on April 2, 2016. The ERCs that were not used prior to the expiration date have been set to zero (0) and have become unassigned emissions for the purpose of the PSEL and are no longer available for use as external offsets. Unassigned emissions are established with this renewal and will be reduced to no more than the significant emission rate (SER) at the following renewal in accordance with LRAPA’s Title 42 (Section 42-0055).

Pollutant	PSEL (tons/yr)	Previous Unassigned Emissions (tons/yr)	Proposed Unassigned Emissions (tons/yr)	Previous ERCs (tons/yr)	Proposed ERCs (tons/yr)
PM	24	--	19	19	0
PM ₁₀	14	7.6	27	19	0
PM _{2.5}	9	4.9	17	--	--
CO	99	--	--	--	--
NO _x	39	--	16	16	0
SO ₂	--	--	--	--	--
VOC	66	--	--	--	--
GHG	74,000	--	--	--	--

SIGNIFICANT EMISSION RATE

24. The proposed PSEL increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 12 rules for all of the pollutants as shown below.

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Increase from Baseline (tons/year)	SER (tons/year)
PM	23	24	1.2	25
PM ₁₀	22	14	-7.6	15
PM _{2.5}	NA	9	9	10
CO	1.2	99	98	100
NO _x	5.7	39	33	40
VOC	53	66	13	40
SO ₂	<0.5	--	0	40
GHG	4,146	74,000	69,584	75,000

HAZARDOUS AIR POLLUTANTS (HAPS)

25. Under the Cleaner Air Oregon program, only existing sources that have been notified by LRAPA and new sources are required to perform risk assessments. This source has not been notified by LRAPA and is therefore, not yet required to perform a risk assessment or report annual emissions of toxic air contaminants.

LRAPA required reporting of approximately 600 toxic air contaminants in 2016 and regulates approximately 260 toxic air contaminants that have Risk Based Concentrations established in rule. All 187 hazardous air pollutants are on the list of approximately 600 toxic air contaminants. The hazardous air pollutants and toxic air contaminants listed below were reported by the source in 2016 and verified by LRAPA. After the source is notified by LRAPA, they must update their inventory and perform a risk assessment to see if they must reduce risk from their toxic air contaminant emissions. Until then, sources will be required to report toxic air contaminant emissions triennially.

26. The facility is a major source of Hazardous Air Pollutants (HAPs) because the potential emissions of methanol are greater than 10 tons per year and the total combined HAP emissions are greater than 25 tons per year. The facility is subject to the Plywood and Composite Wood Products MACT (40 CFR 63, Subpart DDDD). The requirement imposed by this standard is that the permittee shall use exclusively non-HAP coatings for Group 1 Miscellaneous Coating Operations. The natural gas fired press heaters are subject to the Commercial and Industrial Boiler NESHAP (40 CFR Part 63, Subpart DDDDD) under the Small Gaseous Fuel subcategory as an existing source. This standard requires a one-time energy assessment and biennial tune-ups of the press heaters. The emissions total below reflect the most current information available for the facility, including information provided in the Cleaner Air Oregon 2016 Emissions Inventory submission.

Pollutant	Potential to Emit (tons/year)
Acetaldehyde	2.16
Arsenic	1.72E-05
Benzene	1.64E-04
Beryllium	9.37E-07
Cadmium	8.59E-05
Dichlorobenzene	9.37E-05
Cobalt	6.56E-06
Formaldehyde	5.25
Fluoranthene (PAH)	2.34E-07
Fluorene (PAH)	2.19E-07
Hexane	1.41E-01
Lead	3.91E-05
Manganese	2.97E-05
Mercury	2.03E-05
Methanol	48.4
Nickel oxide	1.64E-04
2-Methyl naphthalene (PAH)	1.87E-06
Naphthalene	4.77E-05
Phenanthrene (PAH)	1.33E-06
Pyrene (PAH)	3.91E-07
Phenol	1.80
Propionaldehyde	1.87E-02
Toluene	2.66E-04
Chromium	1.09E-04
Total HAPs (tons per year)	57.8

STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

- The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended. Sections 601-618 of the act do not apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

MONITORING REQUIREMENTS

- Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. In addition, the permit includes monitoring of operating parameters for other emission units and pollution control devices. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit.

The facility is required to record material production and throughput totals and to estimate actual emissions. The estimations are to be based upon production data, emission factors and estimation methods used in the facility's application or other LRAPA-approved method.

GENERAL TESTING REQUIREMENTS

29. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

SOURCE TEST RESULTS

30. This facility has conducted various source tests to comply with permit requirements. The table below shows the results of the test reports on file at LRAPA.

Emission Device	Test Date	Production Rate During The Test	Results
Baghouse #1	December 2, 1999	Actual Flow Rate = 53,900 acf/min	PM Concentration = 0.0007 gr/dscf Opacity = 0%
Baghouse #1	May 5, 1998	Actual Flow Rate= 71,000 acf/min	PM Concentration = 0.00041 gr/scfd Opacity = 0%

RECORDKEEPING REQUIREMENTS

31. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions.

REPORTING REQUIREMENTS

32. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a logbook attached to the annual report. Emissions fees reports are required annually. Additionally, some boiler NESHAP reports are required to be submitted electronically and directly to EPA by way of their Central Data Exchange (CDX).

COMPLIANCE HISTORY

33. Pursuant to the requirements of Condition 14 of LRAPA Title V Operating Permit No. 208256 in effect at the time and LRAPA 33-060-3A(2) [currently LRAPA 33-060(3)(B)], the facility began performing weekly visible emissions tests using EPA Method 9 in July 1997. Based on the results of these tests, it was determined that the facility was not in compliance with the visible emission standard on several occasions after July 1997. LRAPA issued a Notice of Noncompliance (NON) in October 1997 which required the facility to come into continuous compliance with the standard. On December 18, 1997, LRAPA issued Stipulated Final Order (SFO) No. 97-1427 with the goal of establishing conditions and a schedule to require the facility to operate in compliance with the standard.
34. Condition 16.b of the SFO stated the following: “If TJM [Trus Joist MacMillan – the facility name at the time] determines for one or more of the dryers that process and maintenance procedures are insufficient to ensure compliance . . . TJM shall issue purchase orders for control equipment appropriate to ensure compliance . . . A description of the controls selected and a construction schedule shall be submitted . . . In no event shall the final completion date be later than May 15, 1999.”
35. Pursuant to condition 16.b of the SFO, the facility determined that add-on controls were necessary to ensure compliance with the opacity standard. The facility selected a 37,000 scfm regenerative thermal oxidizer (RTO) as the preferred control method and submitted a Notice of Approval to Construct application to LRAPA on July 15, 1998. To allow the facility to begin building the control device as soon as possible, LRAPA issued a conditional Notice of Approval to Construct the device on September 14, 1998. The Notice only authorized construction of the RTO and prohibited any physical connection to a fuel supply or to the dryers themselves.
36. The facility received LRAPA approval for the removal of the veneer dryers and the modified RTO (T=RTO-1) on November 6, 2006 by way of Approval to Construct NC-208256-C06 and a notice of completion was submitted by the facility on January 18, 2008. The completion notice indicated the two (2) dryers and RTO were removed on April 21, 2007. An Administrative Amendment was submitted by the facility to remove the dryers and RTO and the previous permit renewal (2008) reflected the removal of the veneer dryers and RTO.
37. As of the date of this permit issuance, there are no open enforcement actions or non-compliances for this facility.
38. The facility file indicates the most recent inspection occurred August 14, 2017 for their full compliance evaluation and the source was deemed to be in compliance with all permit conditions (PCADS inspection report #2316).

PUBLIC NOTICE

39. The draft permit was on public notice from December 3, 2020 to January 7, 2021. During this period, LRAPA received one comment from the general public. The commenter expressed concerns about the accidental release language detailed in Section 20.a of the Review Report, asking if there had been accidental releases in the past, to what extent these releases occurred and through which environmental media. No written comments were submitted in writing during the comment period. No public hearing was

requested by 10 or more individuals or one person representing a group of 10 or more individuals. After the comment period, this proposed permit will then be sent to EPA for a 45-day review period. LRAPA may requested and EPA may agree to an expedited review of 5 days if there were no substantive or adverse comments during the comment period.

If the EPA does not object in writing, any person may petition the EPA within 60 days after the expiration of EPA's 45-day review period to make such objection. Any such petition must be based only on objections to the permit that were raised with reasonable specificity during the public comment period provided for in OAR 340-218-0210, unless the petitioner demonstrates that it was impracticable to raise such objections within such period, or unless the grounds for such objection arose after such period.

LRAPA Response: The language in this section of the Review Report refers to the facility's certification that they are not currently subject to 40 CFR Part 68 – Chemical Accident Prevention Provisions, which requires a risk management plan if the facility utilizes extremely hazardous toxic and flammable substances listed in 40 CFR 68.130 in an amount above the “threshold quantity” specified for that substance. This section does not indicate that an accidental release has occurred at the facility but ensures that the facility understands their responsibility to regularly evaluate their applicability to the provisions of 40 CFR Part 68.

EPA REVIEW

40. This proposed permit was sent to EPA on January 11, 2021, for a 45-day review period. Because no adverse comments were received and there were no substantive changes to the permit after the public comment period, LRAPA requested an EPA expedited review of the proposed permit, and EPA approved the expedited review. In any event, the public will have 105 days (45-day EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.

PTE EMISSIONS DETAIL SHEET

Pollutant	Emission Unit	Annual Production/Process Rate		Emissions Factor			Emissions tons/yr
		Rate	Units	Rate	Units	Reference	
PM	EU-WRH: Cyclones w/ Baghouses	71,671	BDT/yr	0.001	lb/BDT	DEQ AQ-EF02	0.04
	EU-WRH: Truck Loading Fugitives	71,671	BDT/yr	0.086	lb/BDT	AP-42 Table 9.9.1-1	3.1
	EU-I-Oven: I-Line Oven	58.24	MMscf/yr	2.5	lb/MMscf	DEQ AQ-EF05	0.07
	EU-Press Heaters: Press Heaters	98	MMscf/yr	2.5	lb/MMscf	DEQ AQ-EF05	0.12
	EU-AI: Aggregate Insignificant						1
						Total PM	4.3
PM ₁₀	EU-WRH: Cyclones w/ Baghouses	71,671	BDT/yr	0.001	lb/BDT	DEQ AQ-EF02	0.04
	EU-WRH: Truck Loading Fugitives	71,671	BDT/yr	0.029	lb/BDT	AP-42 Table 9.9.1-1	1.0
	EU-I-Oven: I-Line Oven	58.24	MMscf/yr	2.5	lb/MMscf	DEQ AQ-EF05	0.07
	EU-Press Heaters: Press Heaters	98	MMscf/yr	2.5	lb/MMscf	DEQ AQ-EF05	0.12
	EU-AI: Aggregate Insignificant						1
						Total PM₁₀	2.3
PM _{2.5}	EU-WRH: Cyclones w/ Baghouses	71,671	BDT/yr	0.001	lb/BDT	DEQ EF-08, PM _{2.5} /PM ₁₀ =1	0.04
	EU-WRH: Truck Loading Fugitives	71,671	BDT/yr	0.0049	lb/BDT	AP-42 Table 9.9.1-1	0.18
	EU-I-Oven: I-Line Oven	58.24	MMscf/yr	2.5	lb/BDT	DEQ AQ-EF05, PM _{2.5} /PM ₁₀ =1	0.07
	EU-Press Heaters: Press Heaters	98	MMscf/yr	2.5	lb/BDT	DEQ AQ-EF05, PM _{2.5} /PM ₁₀ =1	0.12
	EU-AI: Aggregate Insignificant						1
						Total PM_{2.5}	1.4
SO ₂	EU-I-Oven: I-Line Oven	58.24	MMscf/yr	1.7	lb/MMscf	DEQ AQ-EF05	0.05
	EU-Press Heaters: Press Heaters	98	MMscf/yr	2.6	lb/MMscf	DEQ AQ-EF05	0.13
						Total SO₂	0.18
NO _x	EU-I-Oven: I-Line Oven	58.24	MMscf/yr	100	lb/MMscf	DEQ AQ-EF05	2.9
	EU-Press Heaters: Press Heaters	98	MMscf/yr	100	lb/MMscf	DEQ AQ-EF05	4.9
						Total NO_x	7.8
CO	EU-I-Oven: I-Line Oven	58.24	MMscf/yr	84	lb/MMscf	DEQ AQ-EF05	2.4
	EU-Press Heaters: Press Heaters	98	MMscf/yr	84	lb/MMscf	DEQ AQ-EF05	4.1
						Total CO	6.6
VOC	EU-Presses: LVL Presses	41,795,712	lbs/yr	0.0027	lb/lb	Momentive test data (heated sealed caul plate test data)	56.4
	EU-I-Line: I-Line Process	3,147,756	lb/yr	0.004	lb/lb	Momentive test data (heated sealed caul plate test data)	6.3
	EU-WSO: Watershed Overlay Process	2,000,000	cf/yr	0.0020426	lb/cf	Arclin test data	2.0
	EU-I-Oven: I-Line Oven	58	MMscf/yr	6	lb/MMscf	DEQ AQ-EF05	0.2
	EU-Press Heaters: Press Heaters	98	MMscf/yr	6	lb/MMscf	DEQ AQ-EF05	0.3
EU-AI: Aggregate Insignificant						1	
						Total VOC	66.0

BASELINE EMISSION RATES EMISSIONS DETAIL SHEET

Pollutant	Emission Unit	Annual Production/Process Rate		Emissions Factor			Emissions
		Rate	Units	Rate	Units	Reference	tons/yr
PM	Wood Residuals Handling System						
	Cyclone No. 1	6,725	BDT/yr	0.5	lb/BDT	DEQ	1.7
	Baghouse No. 1	4,484	BDT/yr	0.001	lb/BDT	DEQ	0.002
	Truck Loading Fugitives	11,209	BDT/yr	0.086	lb/BDT	AP-42	0.48
	I-Line Combustion	23.5	MMcf/yr	12	lb/MMcf	DEQ	0.14
	Veneer Drying (2 units)	2,338,738	cu ft/yr	0.01664	lb/cf	DEQ	19.5
	EU-AI: Aggregate Insignificant						1
					Total PM	22.8	
PM ₁₀	Wood Residuals Handling System						
	Cyclone No. 1	6,725	BDT/yr	0.25	lb/BDT	DEQ	0.84
	Baghouse No. 1	4,484	BDT/yr	0.001	lb/BDT	DEQ	0.002
	Truck Loading Fugitives	11,209	BDT/yr	0.029	lb/BDT	AP-42	0.16
	I-Line Combustion	24	MMcf/yr	12	lb/MMcf	DEQ	0.14
	Veneer Drying (2 units)	2,338,738	cu ft/yr	0.01664	lb/cf	DEQ	19.5
	EU-AI: Aggregate Insignificant						1
					Total PM₁₀	21.6	
SO ₂	I-Line Combustion	23.5	MMcf/yr	0.6	lb/MMcf	DEQ Factor	0.01
	Veneer Drying (2 units)	2,338,738	cu ft/yr	0.00002	lb/cu ft	DEQ Factor	0.02
						Total SO₂	0.030
NO _x	I-Line Combustion	23.5	MMcf/yr	100	lb/MMcf	DEQ Factor	1.2
	Veneer Drying (2 units)	2,338,738	cu ft/yr	0.00384	lb/cu ft	DEQ Factor	4.5
						Total NO_x	5.7
CO	I-Line Combustion	23.5	MMcf/yr	40	lb/MMcf	DEQ Factor	0.47
	Veneer Drying (2 units)	2,338,738	cu ft/yr	0.00064	lb/cu ft	DEQ Factor	0.75
						Total CO	1.2
VOC	I-Line Combustion	23.5	MMcf/yr	11	lb/MMcf	DEQ Factor	0.13
	Veneer Drying (2 units)	2,338,738	cu ft/yr	0.00704	lb/cu ft	DEQ Factor	8.2
	I-Line Process	474,460	lb adhesive/yr	0.0088	lb/lb adhesive	Borden Tests (6/96)	2.1
	Presses (1, 2 &3)	9,146,025	lb adhesive/yr	0.009	lb/lb adhesive	Borden Tests (6/96)	41.2
	EU-AI: Aggregate Insignificant						1
					Total VOC	52.6	

GREENHOUSE GAS PTE AND BASELINE EMISSION DETAIL SHEET

GHG Potential to Emit (PTE)

Emission Unit	Annual Production or Process Rate		Emissions Factor			Emissions
	Rate	Units	Rate	Units	Reference	metric tons/yr
EU-I-Oven: I-Line Oven	58.24	MMscf/yr	53.06	kg CO2/mmBtu	Table C-1 to Subpart C of 40 CFR Part 98	3171
			0.001	kg CH4/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.1
			0.0001	kg N2O/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.01
EU-Press Heaters: Press Heaters	98	MMscf/yr	53.06	kg CO2/mmBtu	Table C-1 to Subpart C of 40 CFR Part 98	5335
			0.001	kg CH4/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.1
			0.0001	kg N2O/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.01
					Total GHG (metric tons)	8506
					Total GHG (short tons)	9356

GHG 2005 Baseline

Emission Unit	Annual Production or Process Rate		Emissions Factor			Emissions
	Rate	Units	Rate	Units	Reference	metric tons/yr
EU-I-Oven: I-Line Oven	10.03	MMscf/yr	53.06	kg CO2/mmBtu	Table C-1 to Subpart C of 40 CFR Part 98	546.3
			0.001	kg CH4/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.01
			0.0001	kg N2O/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.001
EU-Press Heaters: Press Heaters	59.20	MMscf/yr	53.06	kg CO2/mmBtu	Table C-1 to Subpart C of 40 CFR Part 98	3222.7
			0.001	kg CH4/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.1
			0.0001	kg N2O/MMBtu	Table C-2 to Subpart C of 40 CFR Part 98	0.01
					Total GHG (metric tons)	3769
					Total GHG (short tons)	4146

PM_{2.5} NETTING BASIS EMISSION DETAIL SHEET

Emission Unit	Annual Production/ Process Rate		PM ₁₀ Emissions Factor		PM _{2.5} Fraction	Reference	PM _{2.5} Emissions Factor		PM ₁₀ Emissions	PM _{2.5} Emissions
	Rate	Units	Rate	Units					tons/yr	
EU-WRH: Cyclones w/ Baghouses	71,671	BDT/yr	0.001	lb/BDT	1	DEQ EF-08	0.001	lb/BDT	0.04	0.04
EU-WRH: Truck Loading Fugitives	71,671	BDT/yr				AP-42 Table 9.9.1-1	0.0049	lb/BDT	1.04	0.18
EU-I-Oven: I-Line Oven	58.24	MMscf/yr	2.5	lb/MMscf	1	DEQ AQ-EF05	2.5	lb/BDT	0.07	0.07
EU-Press Heaters: Press Heaters	98	MMscf/yr	2.5	lb/MMscf	1	DEQ AQ-EF05	2.5	lb/BDT	0.12	0.12
EU-AI: Aggregate Insignificant									1	1
								Total	2.3	1.4

PM _{2.5} /PM ₁₀ Fraction (R) ¹	0.62	= PM _{2.5} Emissions / PM ₁₀ Emissions
PM ₁₀ Netting Basis	21.6	From Review Report
PM _{2.5} Netting Basis Calculation	13.4	= 21.6 x 0.62
PM ₁₀ Unassigned Emissions	27	Established in this permitting action
PM _{2.5} Unassigned Emissions Calculation	16.7	= 27 x 0.62

¹NOTE: The ratio (R) of PM_{2.5} PSEL to PM₁₀ PSEL was recalculated in the permit renewal from 0.64 to 0.62 using DEQ guidance that states that if the PSELs are the Generic PSELs, then the ratio (R) should be calculated using the portion of the PSEL attributable to actual emission units at the source (1.4 tons/yr ÷ 2.3 tons/yr). The ratio (R) calculated in the previous permit renewal utilized the Generic PSELs (9 tons/yr ÷ 14 tons/yr).

HAZARDOUS AIR POLLUTANT PTE/PSEL EMISSIONS DETAIL SHEET

Pollutant	Emissions Unit ID or Activity	Maximum Production or Process Rate		Emissions Factor			Maximum Projected Emissions
		Rate	Units	Rate	Units	Reference	tons/year
Acetaldehyde	Presses - LVL based	14,927	MCF LVL	2.90E-01	lb/MCF LVL	AP-42, Table 10.9-6	2.16E+00
Arsenic	I Line Oven and Press heater	156.24	MMCF nat. gas	2.20E-04	lb/MMCF	AP-42, Table 1.4-4	1.72E-05
Benzene	I Line Oven and Press heater	156.24	MMCF nat. gas	2.10E-03	lb/MMCF	AP-42, Table 1.4-3	1.64E-04
Beryllium	I Line Oven and Press heater	156.24	MMCF nat. gas	1.20E-05	lb/MMCF	AP-42, Table 1.4-4	9.37E-07
Cadmium	I Line Oven and Press heater	156.24	MMCF nat. gas	1.10E-03	lb/MMCF	AP-42, Table 1.4-4	8.59E-05
Dichlorobenzene	I Line Oven and Press heater	156.24	MMCF nat. gas	1.20E-03	lb/MMCF	AP-42, Table 1.4-3	9.37E-05
Cobalt	I Line Oven and Press heater	156.24	MMCF nat. gas	8.40E-05	lb/MMCF	AP-42, Table 1.4-4	6.56E-06
Copper*	I Line Oven and Press heater	156.24	MMCF nat. gas	8.50E-04	lb/MMCF	AP-42, Table 1.4-4	6.64E-05
Formaldehyde	Presses - resin based	41,795,712	lb resin	2.00E-04	lb/lb resin	Sealed caul plate test	4.18E+00
	I-Line	3,147,756	lb resin	6.00E-04	lb/lb resin	Sealed caul plate test	9.44E-01
	I Line Oven and Press heater	156.24	MMCF nat. gas	7.50E-02	lb/MMCF	AP-42, Table 1.4-3	5.86E-03
	WSO	2,000,000	cf/yr	1.16E-04	lb/cf LVL	Sealed caul plate test	1.16E-01
						Total Formaldehyde	5.25
Fluoranthene (PAH)	I Line Oven and Press heater	156.24	MMCF nat. gas	3.00E-06	lb/MMCF	AP-42, Table 1.4-3	2.34E-07
Fluorene (PAH)	I Line Oven and Press heater	156.24	MMCF nat. gas	2.80E-06	lb/MMCF	AP-42, Table 1.4-3	2.19E-07
Hexane	I Line Oven and Press heater	156.24	MMCF nat. gas	1.8	lb/MMCF	AP-42, Table 1.4-3	1.41E-01
Lead	I Line Oven and Press heater	156.24	MMCF nat. gas	5.00E-04	lb/MMCF	AP-42, Table 1.4-2	3.91E-05
Manganese	I Line Oven and Press heater	156.24	MMCF nat. gas	3.80E-04	lb/MMCF	AP-42, Table 1.4-4	2.97E-05
Mercury	I Line Oven and Press heater	156.24	MMCF nat. gas	2.60E-04	lb/MMCF	AP-42, Table 1.4-4	2.03E-05
Methanol	Presses - resin based	41,795,712	lb resin	2.10E-03	lb/lb resin	Sealed caul plate test	4.39E+01
	I-Line	3,147,756	lb resin	4.00E-04	lb/lb resin	Sealed caul plate test	6.30E-01
	WRH	14,927,040	CF LVL	3.00E-04	lb/CF LVL	Plywood baghouse test	2.24E+00
	WSO	2,000,000	cf/yr	1.65E-03	lb/cf LVL	Sealed caul plate test	1.65E+00
						Total Methanol	48.4
Nickel oxide	I Line Oven and Press heater	156.24	MMCF nat. gas	2.10E-03	lb/MMCF	AP-42, Table 1.4-4	1.64E-04
2-Methyl naphthalene (PAH)	I Line Oven and Press heater	156.24	MMCF nat. gas	2.40E-05	lb/MMCF	AP-42, Table 1.4-3	1.87E-06
Naphthalene	I Line Oven and Press heater	156.24	MMCF nat. gas	6.10E-04	lb/MMCF	AP-42, Table 1.4-3	4.77E-05
Phenanthrene (PAH)	I Line Oven and Press heater	156.24	MMCF nat. gas	1.70E-05	lb/MMCF	AP-42, Table 1.4-3	1.33E-06
Pyrene (PAH)	I Line Oven and Press heater	156.24	MMCF nat. gas	5.00E-06	lb/MMCF	AP-42, Table 1.4-3	3.91E-07
Phenol	Presses - resin based	41,795,712	lb resin	5.00E-06	lb/lb resin	Sealed caul plate test	1.04E-01
	I-Line	3,147,756	lb resin	9.00E-04	lb/lb resin	Sealed caul plate test	1.42E+00
	WSO	2,000,000	cf/yr	2.77E-04	lb/cf LVL	Sealed caul plate test	2.77E-01
						Total Phenol	1.80
Propionaldehyde	Presses - LVL based	156.24	MCF LVL	2.40E-01	lb/MCF LVL	AP-42, Table 10.9-6	1.87E-02
Toluene	I Line Oven and Press heater	156.24	MMCF nat. gas	3.40E-03	lb/MMCF	AP-42, Table 1.4-3	2.66E-04
Zinc oxide*	I Line Oven and Press heater	156.24	MMCF nat. gas	2.90E-02	lb/MMCF	AP-42, Table 1.4-4	2.27E-03
Chromium	I Line Oven and Press heater	156.24	MMCF nat. gas	1.40E-03	lb/MMCF	AP-42, Table 1.4-4	1.09E-04
						Total HAP	57.8

*Cleaner Air Oregon (OAR 340-245) air toxics, not included in HAP total