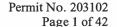
Expiration Date: December 5, 2029





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

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

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

**ISSUED TO:** 

**Murphy Company** Prairie Road Panelboard Plant

2350 Prairie Road Eugene, Oregon 974704

PLANT SITE LOCATION:

2350 Prairie Road Eugene, Oregon 974704 INFORMATION RELIED UPON:

Application Number: 69606, 69709, 70600 Received: 05/02/2023, 06/30/2023, 4/29/2024

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Eugene Dated: May 29, 1997

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Travis Knudsen, Executive Director

December 5, 2024

Date

NATURE OF BUSINESS:

SIC

**NAICS** 

Hardwood Veneer and Plywood Manufacturing

2435

321211

Fuel Burning Equipment (Boilers)

4961

Title:

221330

RESPONSIBLE OFFICIAL:

FACILITY CONTACT PERSON:

Title: Vice President Production

Title: President

**Executive Vice President** Title:

Title: Manager

Kelly Robinson, John Murphy, John Murphy Name:

Jr., Ron Murray, Troy McCrae, and Brent Way

Vice President Production, President, Executive Vice

President, Manager, Facilities Manager, and

**Environmental Manager** 

Phone: (541) 461-4545

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# LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

NA **NESHAP** 

 $NO_x$ NSPS

 $O_2$ 

National Emission Standard for Hazardous Air Pollutants Nitrogen oxides New Source Performance

Standards

Oxygen

A CIDID	A' Contant D' 1 m D	OAD	O A 1
ACDP	Air Contaminant Discharge Permit	OAR	Oregon Administrative Rules
Act	Federal Clean Air Act	ODEQ	Oregon Department of
ASTM	American Society of Testing and	ODG	Environmental Quality
DDT	Materials	ORS	Oregon Revised Statutes
BDT	Bone dry ton	OSHA	Occupational Safety and Health
BDU	Bone dry unit	0016	Administration
BF	Board feet	O&M	Operation and maintenance
Btu	British thermal unit	Pb	Lead
CFR	Code of Federal Regulations	PCD	Pollution Control Device
CO	Carbon Monoxide	PM	Particulate matter
$CO_2$	Carbon Dioxide	$PM_{10}$	Particulate matter less than 10
$CO_2e$	Carbon Dioxide Equivalent		microns in size
CPMS	Continuous parameter monitoring system	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
Day	A calendar 24-hour period	ppmv	Parts per million by volume
DÉQ	Department of Environmental	ppm	Parts per million
	Quality	PSEL	Plant Site Emission Limit
dscf	Dry standard cubic feet	psia	Pounds per square inch, actual
EF	Emission factor	RICE	Reciprocating Internal Combustion
ERC	Emission Reduction Credit	IUCL	Engine Engine
EPA	US Environmental Protection	RMP	Risk Management Plan
LIT	Agency	RTO	Regenerative Thermal Oxidizer
EPI	Epichlorohydrin	SACC	Semi-Annual Compliance
ESP	Electrostatic Precipitator	BACC	Certification
EU	Emissions Unit	SERP	Source emissions reduction plan
FCAA	Federal Clean Air Act	SO <sub>2</sub>	Sulfur dioxide
FHAP	Federal Hazardous Air Pollutant as	ST	Source test
ГПАГ		TPY	Tons per year, (short ton=2000 lbs)
FSA	defined by LRAPA title 12 Fuel sampling and analysis	UF	Urea Formaldehyde
GHG	Greenhouse Gas	UFC	
			Urea-Formaldehyde Concentrate
gr/dscf	Grain per dry standard cubic foot (1	VDSC	Veneer Dryer Scrubber Control
HCEC	pound=7000 grains)	VE	Visible emissions
HCFC	Halogenated Chloro-Fluoro-Carbon	VMT	Vehicle miles traveled
НСОН	Formaldehyde	VOC	Volatile organic compounds
ID	Identification number	Week	Calendar week starting at 12:01 am
I&M	Inspection and maintenance		on Sunday morning
LRAPA	Lane Regional Air Protection	Year	A period consisting of any 12-
	Agency		consecutive calendar months
M	1,000		
MM	1,000,000		
Month	Calendar month		
MB	Material Balance		
MBF	1,000 Board feet		
MSF	1,000 Square feet 3/8" basis		
MSDS	Material Safety Data Sheet		
NA	Not applicable		
MECHAD	National Emission Standard for		

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## 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. [LRAPA 34-180, OAR 340-218-0010 and OAR 340-218-0120(2)]

- 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 7, 8 and G5 and part of G9 (LRAPA title 43) are only enforceable by 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)]

EU ID	Emission Unit Description	PCD ID	Pollution Control Device Description
EU-01	Veneer Drying Operations Veneer Dryer #1	VDSC	Packed-bed Wet Scrubber
	Veneer Dryer #2		
EU-01A	East Fuel Cell (EU-01 heat source)	VDSC	Packed-bed Wet Scrubber
EU-02	Plywood Production	NA	None
	Hot Press #1		
	Hot Press #2		
EU-03	Finishing Line	NA	None
EU-04	Wood Residuals Conveying System A	Bag-1,	Three (3) Baghouses
	Core Saws	Bag-2,	
	Skinner and Cutoff Saws	and Bag-3	
	Sanding Lines Groovers		
	Big Cyclone		
	Buffers		
	#2 Metering Bin Cyclone		
EU-05	Wood Residuals Conveying System B	Bag-4	Baghouse
	Metering Bin Cyclone		5
EU-07	Unpaved Road Emissions	NA	None
EU-08	West Fuel Cell	ESP	Dry ESP
EU-09	Hogged Fuel Pile	NA	Enclosed Building
EU-10	Putty Patching Operations	NA	None
EU-AGG	Aggregate Insignificant (AI) Activities #1 Natural Gas Boiler	NA	None
	#2 Natural Gas Boiler		
	Paper Cyclone		
	Sample Department Cyclone		
	Carpenter Shop Cyclone		
	Rubber Cyclone		
CIA	Categorically Insignificant Activities	None	None
EU-CIA-1	Paved Roads		
EU-CIA-2	Diesel-Fired 48.8 Hp Emergency Generator		
EU-CIA-3	Gas-fired 28 Hp Emergency Generator		
EU-CIA-4	Gas-fired 28 Hp Emergency Generator		

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# 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.

## **Facility-wide Emission Limits and Standards**

Applicable	Condition	Pollutant/	Limit/Standard	Monitoring I	Requirements
Requirement	Number	Parameter	Ellini/Standard	Method	Condition Number
48-015	4	Fugitive Emissions	Minimize	Recordkeeping	5, 6
49-010(1)	7	Nuisance	No nuisance	Recordkeeping	10
32-055	8	PM >250 microns	No deposition of PM >250 microns on others' property	Recordkeeping	10
32-090(1)	9	Injury or damage to persons or property	Prohibited	Recordkeeping	10
40 CFR Part 68	11	Risk management	Risk management plan	Recordkeeping	11
33-060	12	PM	1.0 pound per 1000 square feet of production	Parametric, O&M	13

- 4. <u>Applicable Requirement</u>: The permittee must not 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 not be 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; and
  - 4.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
- 5. <u>Monitoring Requirement</u>: *At least once each week* for a minimum period of 30 minutes, the permittee must visually survey the facility using EPA Method 22 for any sources of excess fugitive emissions. For purposes of this condition, excess fugitive emissions are visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period. The minimum observation

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time must be at least six (6) minutes. The person conducting the observation must follow EPA Method 22. If sources of excess fugitive emissions are identified, the permittee must: [LRAPA 34-016, LRAPA 48-015(2)&(3) and 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. 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.
- 6. <u>Recordkeeping Requirement</u>: The permittee must maintain records of the fugitive emissions surveys and corrective actions, as applicable. The record must be maintained onsite for a period of at least five (5) years and must be provided to LRAPA personnel on request. [LRAPA 34-016 and OAR 340-218-0050(3)(b)]

# **Nuisance, Deposition and Other Discharge Conditions**

- 7. <u>Applicable Requirement</u>: The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010(1)] This condition is enforceable only by LRAPA.
- 8. <u>Applicable Requirement</u>: The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at such duration and 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. <u>Applicable Requirement</u>: The permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination to be made by LRAPA. [LRAPA 32-090(1)]
- 10. Monitoring and Recordkeeping Requirement: To demonstrate compliance with Conditions 7 through 9, the permittee must maintain a log of all complaints received by the responsible official or designated employees (written, received via telephone or facsimile). The log must also record permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the problem within two (2) working days of receiving the complaint or within such longer time as is reasonably necessary, not to exceed five (5) working days. If more than five (5) days are needed to resolve the problem, the permittee must notify LRAPA immediately upon making that determination. [LRAPA 34-016, OAR 340-218-0050(3)(a), and OAR 340-218-0050(3)(b)]

#### **Accidental Release Prevention**

11. <u>Applicable Requirement</u>: 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]

#### LRAPA Title 33 – Section 33-060 Board Products Industries

Applicable Requirement: The permittee must not cause the emission of particulate matter from veneer and plywood mill sources (EU-02, EU-04, and EU-5) in excess of a total from all sources within the plant site of an average hourly emission rate pounds per hour of 55.0 based on the maximum hourly production capacity of the facility times one (1.0) pound per 1000 square feet of production. [LRAPA 33-060(3)(b), (c)]

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13. Monitoring and Recordkeeping Requirement: To demonstrate compliance with the emission limit specified in Condition 12, the permittee must maintain records once per 8-hour shift showing that the average amount of veneer dried during the 8-hour shift does not exceed 55,000 square feet/hour on a 3/8" basis of finished product equivalent. [LRAPA 34-016]

#### INDIVIDUAL EMISSION-UNIT-SPECIFIC EMISSION LIMITS AND STANDARDS

# Emissions Unit EU-01 and EU-01A (Veneer Drying Operations and East Fuel Cell) Specific Emission Limits and Standards

Applicable	Condition	Pollutant/	Limit/Standard	Monitoring 2	Requirement
Requirement	Number	Parameter	Ennie Standard	Method	Condition Number
33-060(3)(a)(B)(i)	14.a	Visible Emissions	10% average opacity, 2 days within any 12-month period separated by at least 30 days	Periodic VE observations, Recordkeeping	15, 16
33-060(3)(a)(B)(ii)	14.b	Visible Emissions	20% maximum opacity, at any time	Periodic VE observations Recordkeeping	15, 16
32-015(2)(b)(A)	17	PM	0.10 gr/dscf	Periodic VE observations, Recordkeeping	20
32-045(1)	18	PM	Process Weight Rate Limit	Periodic VE observations, Recordkeeping	20
33-060(3)(a)(C)	19	PM	0.75 lb/MSF and/or 1.50 lb/MSF	Periodic VE observations, Recordkeeping	20
33-060(3)(a)(E)	21	Highest and Best Control	Operation and Maintenance	O&M Plan, Recordkeeping	22
32-007(1)	4	Fugitive Emissions	Minimize	O&M Plan	5

- 14. <u>Applicable Requirement</u>: The permittee must not operate any veneer dryer in EU-01 such that visible air contaminants emitted from any dryer stack or emission point exceed: [LRAPA 33-060(3)(a)(B)]
  - 14.a. A daily average operating opacity of 10 percent on more than two days within any 12-month period, with the days separated from each other by at least 30 days, as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(i)]
  - 14.b. A maximum opacity of 20 percent at any time as measured by EPA Method 9. [LRAPA 33-060(3)(a)(B)(ii)]
- 15. <u>Monitoring Requirements</u>: To demonstrate compliance with Condition 14, the permittee must monitor the visible emissions *at least monthly* by conducting a visual emissions survey utilizing EPA Method 9. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period. [LRAPA 35-0120 and OAR 340-218-0050(3)(a)]
  - 15.a. If an exceedance of the opacity limit occurs, the frequency of visible emissions surveys must be increased to weekly until six (6) consecutive weeks of operation show opacity less than the 10% limit, then the visible emissions survey frequency may revert to a monthly schedule.

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15.b. Visible emissions survey must be conducted during any operating condition that may result in an exceedance of the emission limits established in Condition 14, such as VDSC failure, veneer dryer upset or maintenance, or excursions of parametric monitoring setpoints.

- 15.c. If the permittee is unable to conduct the visual emissions survey due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the permittee must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the visual emissions survey at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
- 16. Recordkeeping Requirements: The permittee must maintain records of the visible emissions surveys required in Condition 15 and corrective actions, as applicable. The record must be maintained onsite for a period of at least five (5) years and must be provided to LRAPA personnel on request. [LRAPA 34-016 and OAR 340-218-0050(3)(b)]
  - 16.a. All visible emissions survey records must include the following information:

16.a.i. Name of observer,

16.a.ii. Date of observation(s),

16.a.iii. Time of observation(s),

16.a.iv. Operating conditions during observations (production rates, species of veneer dried, amount of veneer dried (1000 sqft/hr on a 3/8" basis), amount of redry, dryer conditions including dryer temperatures by zone and drying time, and VDSC gas temperature),

16.a.v. Results of observation(s), and

16.a.vi. Weather conditions during observations

- 17. <u>Applicable Requirement</u>: The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grains per dry standard cubic foot, from EU-01. [LRAPA 32-015(2)(b)(A)]
- 18. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 19. <u>Applicable Requirement:</u> Particulate emissions from wood-fired veneer dryers may not exceed:
  - 19.a. 0.75 pounds per 1000 square feet of veneer dried (3/8" basis) for units using fuel which has a moisture content equal to or less than 20 percent by weight on a wet basis as measured by ASTM D442-84; or [LRAPA 33-060(3)(a)(C)(i)]
  - 19.b. 1.50 pounds per 1000 square feet of veneer dried (3/8" basis) for units using fuel which has a moisture content of greater than 20 percent by weight on a wet basis as measured by ASTM D442-84. [LRAPA 33-060(3)(a)(C)(ii)]
- 20. <u>Monitoring and Recordkeeping Requirement</u>: The permittee must demonstrate compliance with Conditions 17, 18, and 19 by performing the compliance monitoring required by Conditions 15 and 16. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 21. <u>Applicable Requirement</u>: The permittee must maintain and operate each veneer dryer in EU-01 at all times such that air contaminant generating processes and all contaminant control equipment function at full efficiency and effectiveness so that the emissions of all air contaminants are kept at the lowest practicable levels. [LRAPA 33-060(3)(a)(E)]
- 22. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Condition

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- 21 by monitoring the veneer dyers, VDSC and the VDSC operation as follows: [LRAPA 32-007(1) and OAR 340-218-0050(3)]
- 22.a. The permittee must inspect all veneer dryers (EU-01) at least weekly in accordance with an operation and maintenance (O&M) plan. The O&M must also include inspections of the VDSC for physical degradation during each regularly scheduled maintenance outage. The O&M plan must be reviewed at least once every 12 months and revised for any necessary changes as determined by maintenance personnel. [LRAPA 32-007]
- 22.b. The permittee must take corrective action anytime the inlet Packed Bed Scrubber (VDSC) gas temperature on the veneer dryers (EU-01) is equal to or exceeds 165°F or the pressure drop exceeds two (2) inches of water for the VDSC. Variances from the action level range are not considered violations of this permit as long as the permittee takes corrective action to regain the range in a timely manner. [LRAPA 32-007]
- 22.c. <u>Recordkeeping Requirement</u>: The permittee must record all inspections, maintenance, parametric monitoring range exceedances, and corrective actions taken in a maintenance log for monitoring pertaining to Condition 34. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
- 23. <u>Testing Requirement:</u> Within eighteen (18) months of the veneer dryer(s) startup, the permittee the permittee must conduct emission factor verification tests for EU-01 and EU-01A in accordance with the DEQ Source Sampling Manual and the testing requirements specified in Condition 79 for the emission units/emission factors and pollutants identified in Condition 78. This requirement applies to any veneer dryer(s) startup after February 28, 2023. [LRAPA 35-0140 and 34-016]

# Emissions Unit EU-02 (Plywood Production) Specific Emission Limits and Standards

Applicable	Condition	Pollutant/ Limit/Standard		Monitoring I	Requirements
Requirement	Number	Parameter	Limit Standard	Method	Condition Number
32-010(2)&(3)	24	Visible Emissions	20% opacity, 6- minute block average	VE Survey	25, 26
32-015(2)(b)(A)	27	Particulate Matter	0.10 gr/dscf	VE Survey	29
32-045(1)	28	PM	Process Weight Rate Limit	Periodic VE observations, Recordkeeping	29

- 24. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20% opacity as a six-minute block average. The emission standard in this condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(2)&(3)]
- 25. <u>Monitoring Requirements</u>: *At least once per calendar quarter*, the permittee must monitor visible emissions from the press vents in EU-02 in accordance with the following procedures and test methods: [LRAPA 35-0120 and OAR 340-218-0050(3)]
  - 25.a. Except as allowed by Condition 25.c, EPA Method 9 must be used to determine opacity. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
  - 25.b. All visible emissions observations must be conducted during operating conditions that have the potential to create visible emissions.

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- 25.c. Visible emissions survey using EPA Method 9 may be waived for emission units EU-02 provided the following conditions are met:
  - 25.c.i. The permittee must conduct a 6-minute emissions survey of EU-02 using EPA Method 22; and
  - 25.c.ii. Visible emissions, excluding condensed water vapor, from EU-02 are not detected for more than 5% (18 seconds) of the survey time (six minutes).
- 26. Recordkeeping Requirement: All visible emissions observations must be recorded in a log that includes the following information: [LRAPA 35-0120 and OAR 340-218-0050(3)]
  - 26.a. Name of observer,
  - 26.b. Date of observation(s),
  - 26.c. Time of observation(s),
  - 26.d. Operating conditions during observations (press cycle time, board thickness, ply number, press temperature),
  - 26.e. Results of observation(s), and
  - 26.f. Weather conditions during observations.
- 27. <u>Applicable Requirement</u>: The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grains per dry standard cubic foot from the press vents within EU-02, if all representative compliance source test results prior to April 16, 2015 demonstrate that emissions are no greater than 0.080 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)(A)]
- 28. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 29. <u>Monitoring and Recordkeeping Requirement</u>: The permittee must demonstrate compliance with Conditions 27 and 28 by performing the compliance monitoring required by Conditions 25 and 26. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 30. <u>Testing Requirement:</u> Within eighteen (18) months of the veneer dryer(s) startup, the permittee the permittee must conduct emission factor verification tests for EU-02 in accordance with the DEQ Source Sampling Manual and the testing requirements specified in Condition 79 for the emission units/emission factors and pollutants identified in Condition 78. This requirement applies to any veneer dryer(s) startup after February 28, 2023. [LRAPA 35-0140 and 34-016]

# Emissions Units EU-04 and EU-05 (Wood Residuals Conveying System A and Wood Residuals Conveying System B) Specific Emission Limits and Standards

Applicable	Condition	Pollutant/	Limit/Standard	Monitoring 1	Requirement
Requirement	Number	Parameter	Limit Standard	Method	Condition Number
32-010(2)&(3)	31	Visible Emissions	20% Opacity, 6-minute block average	Periodic VE Observations	32
32-015(2)(b)(A)	33	Particulate Matter	0.10 gr/dscf	CAM, O&M Plan, Recordkeeping	35
32-045(1)	34	PM	Process Weight Rate Limit	Periodic VE observations, Recordkeeping	35

31. Applicable Requirement: The permittee must not cause or allow the emissions of any air contaminant into

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the atmosphere from any emission point in EU-04 and EU-05 that equal or exceed an average of 20% opacity as a six-minute block average. The emission standard in this condition does not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(2)&(3)]

- 32. <u>Monitoring and Recordkeeping Requirement</u>: The permittee must monitor visible emissions into the atmosphere from emissions unit EU-04 and EU-05 in accordance with the following procedures, test methods, and frequencies: [LRAPA 35-0120 and OAR 340-218-0050(3)]
  - 32.a. Except as allowed by Condition 32.b, EPA Method 9 must be used to determine opacity. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
  - 32.b. Visible emissions testing, using EPA Method 9, may be waived for emission unit EU-04 or EU-05, provided both of the following conditions are met:
    - 32.b.i. The permittee conducts a six (6) minute visible emissions survey of each point in the emissions unit, using EPA Method 22; and
    - 32.b.ii. Visible emissions from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
  - 32.c. The permittee must use the following monitoring schedule for conducting the visible emissions survey required by Condition 32:
    - 32.c.i. The monitoring frequency for performing the visible emissions survey must be *at least monthly*.
    - 32.c.ii. If an exceedance of the of the opacity limit occurs for an emission point in EU-04 and EU-05, the frequency of visible emissions surveys for that emission point must be increased to weekly. If six (6) consecutive weeks of emissions surveys show that opacity is less than the 20% limit, then visible emissions survey frequency may revert to a monthly schedule.
  - 32.d. If visible emissions are observed from any emissions point in EU-04 and EU-05 during the visible emissions survey, the permittee must immediately initiate corrective action to return the device or activity to its normal operating status such that no visible emissions are present. The permittee must maintain records of all visible emissions incidents and corrective actions taken, if applicable. Any observed exceedance of the opacity standard in Condition 31 must comply with the excess emissions reporting requirements of Condition 86.
  - 32.e. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.
  - 32.f. If the observer is unable to conduct the visible emissions survey due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the visible emissions surveys at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
- 33. <u>Applicable Requirement</u>: The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot, from the point sources (i.e., non-fugitive) within emissions unit EU-04 and EU-05, if all representative compliance source test results prior to April 16, 2015 demonstrate that emissions are no greater than 0.080 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)(A)]

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34. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]

- 35. Monitoring Requirement: The permittee must demonstrate compliance with Conditions 33 and 34 by operating each baghouse used to control PM emissions from EU-04 and EU-05 such that the pressure drop across any baghouse is not less than 0.5 inches nor greater than 8.5 inches of water column. The permittee must use the following compliance assurance methods: [LRAPA 34-180, OAR 340-218-0050(3)(a) and 40 CFR 64.3(b)(4)(iii)].
  - 35.a. *Once each day*, the permittee must monitor and record the pressure drop across the baghouses used to control PM emissions from EU-04 and EU-05.
  - 35.b. *Once per quarter*, the permittee must visually inspect the baghouses used to control PM emissions from EU-04 and EU-05 for wear, plugging, abrasion, and integrity of mechanical and ancillary systems. The permittee must maintain a record of the inspections and any corrective action taken, if applicable.
  - 35.c. The permittee must take corrective action to return to the highest reasonable efficiency and effectiveness, all air pollution control equipment and emission reduction processes that the regular inspections show to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parametric monitoring ranges. The exceedance of a parametric monitoring range must not itself be considered a violation of the emission limits in Conditions 33 and 12. [LRAPA 32-007]
- 36. <u>Recordkeeping Requirement</u>: The permittee must record all visible emission surveys, inspections, maintenance, parametric monitoring range exceedances, and corrective actions taken in a maintenance log for monitoring pertaining to Condition 34. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]

#### Emissions Unit EU-08 (West Fuel Cell) Specific Emission Limits and Standards

Applicable	Condition	Condition Pollutant/ Limit/Standard Monitoring		Requirements	
Requirement	Number	Parameter	Lillily Standard	Method	Condition Number
32-010(2)&(3)	37	Visible Emissions	20% opacity; 6-minute block average	Periodic VE observations	38, 39, 46
32-020(1)(a)&(3)(a)	40	Particulate Matter	0.10 gr/dscf @ 12% CO <sub>2</sub>	Compliance Testing, Recordkeeping	42, 43, 46
32-045(1)	34	PM	Process Weight Rate Limit	Periodic VE observations, Recordkeeping	42
40 CFR Part 63,	49	НАР	General Compliance	Best Practices	49
Subpart JJJJJ	50	НАР	Work Practices	Biennial Tune-up	51, 52

- 37. <u>Applicable Requirement</u>: The permittee must not emit or allow to be emitted any visible emissions from EU-08 installed, constructed, or modified prior to June 1, 1970, that equal or exceed: [LRAPA 32-010(2)&(3)]
  - 37.a. An average of 20% opacity except as allowed by Conditions 37.a.i. and ii.:
    - 37.a.i. Visible emissions may equal or exceed 20 percent opacity but may not equal or exceed 40 percent opacity, as the average of all six-minute blocks during grate cleaning operations provided the grate cleaning is performed in accordance with a

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grate cleaning plan approved by LRAPA; or

37.a.ii. LRAPA may approve, at the permittee's request, a boiler specific limit greater than 20 percent opacity but not to equal or exceed 40 percent opacity based on the opacity measured during a source test that demonstrates compliance with LRAPA 32-020(2) as provided below:

37.a.ii.A.	Opacity must be measured for at least 60 minutes during each compliance source test run using any method included in LRAPA 32-010(2);
37.a.ii.B.	The boiler-specific limit will be the average of at least 30 sixminute block averages obtained during the compliance source test;
37.a.ii.C.	The boiler specific limit will include a higher limit for one (1) six-minute period during any hour based on the maximum six-minute block average measured during the compliance source test; and
37.a.ii.D.	Specific opacity limits will be included in the permit for each affected source as a minor permit modification (simple fee).

- 38. <u>Monitoring Requirement</u>: The permittee must monitor visible emissions into the atmosphere from emissions unit EU-08 in accordance with the following procedures, test methods, and frequencies: [LRAPA 35-0120 and OAR 340-218-0050(3)]
  - 38.a. Except as allowed by Condition 38.b, EPA Method 9 must be used to determine opacity. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
  - 38.b. Visible emissions testing, using EPA Method 9, may be waived for emission unit EU-08, provided both of the following conditions are met:
    - 38.b.i. The permittee conducts a six (6) minute visible emissions survey of each point in the emissions unit, using EPA Method 22; and
    - 38.b.ii. Visible emissions from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
  - 38.c. The permittee must use the following monitoring schedule for conducting the visible emissions survey required by Condition 38:
    - 38.c.i. *At least monthly*, the permittee must monitor visible emissions by conducting a visual emissions survey utilizing EPA Method 9. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each EPA Method 9 test must be a minimum of six (6) minutes long unless any one (1) reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 37 is documented, whichever period is shorter.
    - 38.c.ii. If any EPA Method 9 test result exceeds the applicable standard in Condition 37, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a EPA Method 9 test must be conducted as soon as practicable.
    - 38.c.iii. If an exceedance of the opacity limit specified in Condition 37 for EU-08 occurs, the permittee must increase the frequency of visible emissions surveys to weekly until six (6) consecutive weeks of operation show opacity less than the opacity limit specified in Condition 37, then the visible emissions survey frequency may revert back to a monthly schedule.

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38.d. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.

- 38.e. If the permittee is unable to conduct the EPA Method 9 test due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the permittee must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the visible emissions surveys at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
- 39. <u>Recordkeeping Requirement</u>: The permittee must maintain records of all visible emissions surveys, including but not limited to the following: date, time, operating conditions, observer, results, weather conditions and any corrective actions taken. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
- 40. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU-08 in excess of the following limits: 0.10 grains per standard cubic foot if 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. For fuel burning equipment that burns wood fuel by itself or in combination with any other fuel, the emission results are corrected to 12% CO<sub>2</sub>. [LRAPA 32-020(1)(a) and LRAPA 32-020(3)(a)]
- 41. <u>Applicable Requirement</u>: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from any process in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 42. <u>Monitoring and Recordkeeping Requirement</u>: The permittee must demonstrate compliance with Condition 40 and 41 by performing the compliance monitoring required by Condition 38. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
- 43. <u>Testing Requirement</u>: Within eighteen (18) months of the veneer dryer(s) startup but no later than twelve (12) months prior to expiration of this permit, the permittee must demonstrate compliance with the emission limits specified in Condition 40 by conducting a source test for particulate matter for EU-08 in accordance with Condition 79. [LRAPA 35-0120(1)]
  - 43.a. ODEQ 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 at least 31.8 dry standard cubic feet (dscf). Test results must be reported as grains per dry standard cubic feet (gr/dscf), gr/dscf corrected to 12% CO<sub>2</sub>, pounds per hour, and pounds per 1000 pounds of steam produced.
  - 43.b. During each test run, the permittee must record the following information:
    - 43.b.i. Visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 5 test run, unless weather conditions are such that it is not possible to read opacity;
    - 43.b.ii. Boiler steam production rates (lb/hr);
    - 43.b.iii. Excess boiler oxygen (%);
    - 43.b.iv. Estimated percentage by weight of sanderdust and hogged fuel combusted.
- 44. <u>Applicable Requirement</u>: The permittee must operate the ESP according to the manufacturer's recommendations. The permittee must also inspect the ESP annually, or during each EU-08 shutdown, whichever is sooner for signs of physical degradation that could affect performance of the control device. Any necessary repair or maintenance must be performed prior to restarting EU-08. [LRAPA 32-007(1) and LRAPA 32-007(2)]

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45. Monitoring Requirement: To demonstrate compliance with Condition 40, at a minimum, weekly measurements must be taken and recorded to monitor ESP operations. The measurements must include at a minimum DC voltage and amperage readings of the ESP power supply. The values must be consistent with manufacturer's recommendation for good operations and as specified in Conditions 47.a through 47.c. These measurements must be kept on file for a period of at least five (5) years and be available to LRAPA for review. Variances from the established action levels are not considered violations of this permit as long as the permittee takes corrective action to regain the range in a timely manner. [LRAPA 32-007(1), (2)]

- 45.a. For each ESP field, the minimum secondary voltage must be no less than 25 kV;
- 45.b. For each ESP field, the maximum secondary voltage must be no more than 55 kV; and
- 45.c. For each ESP field, the maximum spark rate must not exceed 50 sparks per minute.
- 46. Recordkeeping Requirement: The permittee must record all inspections, maintenance, parametric monitoring range exceedances, and corrective actions taken in a maintenance log for monitoring pertaining to Condition 46. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]

#### Area Source Boiler NESHAP

# 40 CFR 63 Subpart JJJJJJ – National Emission Standards for Hazardous Air Pollutants for Industrial, Commercial, and Institutional Boilers Area Sources [LRAPA 44-150(5)(jjjjj)]

- 47. <u>Applicable Requirement</u>: *General Compliance* The permittee must at all times operate and maintain the boiler (West Fuel Cell EU-08), including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11205(a)]
- 48. <u>Applicable Requirement</u>: *Biennial Tune-Up* The permittee must conduct a performance tune-up of the boiler (West Fuel Cell EU-08) biennially to demonstrate continuous compliance as specified in Conditions 50.a through 50.g. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. The permittee must conduct the tune-up while burning the type of fuel that provided the majority of the heat input to the boiler over the 12 months prior to the tune-up. [40 CFR 63.11223(a) and 40 CFR 63.11223(b)]
  - 48.a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [40 CFR 63.11223(b)(1)]
  - 48.b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications for the burner, if available. [40 CFR 63.11223(b)(2)]
  - 48.c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). [40 CFR 63.11223(b)(3)]
  - 48.d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject. [40 CFR 63.11223(b)(4)]
  - 48.e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be

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- either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer. [40 CFR 63.11223(b)(5)]
- 48.f. Maintain on-site and submit, if requested by LRAPA, a report containing the information as follows: [40 CFR 63.11223(b)(6)]
  - 48.f.i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler. [40 CFR 63.11223(b)(6)(i)]
  - 48.f.ii. A description of any corrective actions taken as a part of the tune-up of the boiler. [40 CFR 63.11223(b)(6)(ii)]
  - 48.f.iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, 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. [40 CFR 63.11223(b)(6)(iii)]
- 48.g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup. [40 CFR 63.11223(b)(7)]
- 49. Reporting Requirements: The permittee must prepare, by March 15 of each applicable year, and submit to the LRAPA upon request, a biennial compliance certification report for the previous calendar year containing the information specified in Conditions 51.a through 51.c. The permittee must submit the biennial report in the appropriate annual report, as specified in Condition 82.b.iii, if the permittee had any instance described by Condition 51.c. [40 CFR 63.11225(b) and 40 CFR 63.10(a)(5)]
  - 49.a. Company name and address. [40 CFR 63.11225(b)(1)]
  - 49.b. 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 JJJJJJ. The notification must include the following certification(s) of compliance, as applicable, and signed by a responsible official: [40 CFR 63.11225(b)(2)]
    - 49.b.i. "This facility complies with the requirements in § 63.11223 to conduct a biennial or 5-year tune-up, as applicable, of each boiler." [40 CFR 63.11225(b)(2)(i)]
    - 49.b.ii. 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." [40 CFR 63.11225(b)(2)(ii)]
    - 49.b.iii. "This facility complies with the requirement in §§ 63.11214(d) and 63.11223(g) to minimize the boiler's time spent during startup and shutdown and to conduct startups and shutdowns according to the manufacturer's recommended procedures or procedures specified for a boiler of similar design if manufacturer's recommended procedures are not available." [40 CFR 63.11225(b)(2)(iii)]
  - 49.c. 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. [40 CFR 63.11225(b)(3)]
- 50. <u>Recordkeeping Requirements</u>: The permittee must maintain the records specified in Conditions 52.a through 52.e: [40 CFR 63.11225(c)]
  - 50.a. As required in 40 CFR 63.10(b)(2)(xiv), the permittee must keep a copy of each notification and report submitted to comply with 40 CFR 63 Subpart JJJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted. [40 CFR

63.11225(c)(1)]

- 50.b. The permittee must keep records to document conformance with the work practices and management practices required by 40 CFR 63.11214 and 40 CFR 63.11223 as follows: [40 CFR 63.11225(c)(2)]
  - 50.b.i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned. [40 CFR 63.11225(c)(2)(i)
  - 50.b.ii. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR 241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under 40 CFR 241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to 40 CFR 241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in 40 CFR 241.2 and each of the legitimacy criteria in 40 CFR 241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under 40 CFR 241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per 40 CFR 241.4, the permittee must keep records documenting that the material is a listed non-waste under 40 CFR 241.4(a). [40 CFR 63.11225(c)(2)(ii)]
  - 50.b.iii. For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report. [40 CFR 63.11225(c)(2)(iii)]
- 50.c. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment. [40 CFR 63.11225(c)(4)]
- 50.d. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation. [40 CFR 63.11225(c)(5)]
- 50.e. Records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years. [40 CFR 63.11225(d)]
- 51. 40 CFR Part 63 General Provisions according to Table 8 of 40 CFR 63 Subpart JJJJJJ, incorporated by reference. [40 CFR 63.11235]

# Emissions Unit EU-07 and EU-09 (Unpaved Road Emissions and Hogged Fuel Pile) Specific Emission Limits and Standards

Applicable	Condition	Pollutant/	Limit/Standard	Monitoring 1	Requirement
Requirement	Number	Parameter	Elinio Standard	Method	Condition Number
48-015(1)	54	Fugitive Emissions	Minimize	Periodic VE Observations	55

52. <u>Applicable Requirement</u>: The permittee must take reasonable precautions to prevent particulate matter from

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becoming airborne. [LRAPA 48-015(1)]

53. <u>Monitoring and Recordkeeping Requirement</u>: The permittee must demonstrate compliance with Condition 54 by performing the compliance monitoring required by Conditions 5 and 6. [LRAPA 35-0120 and OAR 340-218-0050(3)]

# <u>Categorically Insignificant Activity – Emission Unit CIA-3 and CIA-4 (Natural Gas-Fired 28 Hp Emergency Generators)</u>

National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines -40 CFR 63 Subpart ZZZZ [LRAPA 44-150(5)(ffff)]

- 54. <u>Applicable Requirement</u>: *Work Practice Requirements* The permittee must comply with the following requirements as stated in 40 CFR 63 Subpart ZZZZ Table 2d: [40 CFR 63.6603(a), 40 CFR 63 Subpart ZZZZ Table 2d]
  - 54.a. Change oil and filter every 500 hours of operation or annually, whichever comes first, or utilize an oil analysis program pursuant to Condition 57 to extend the specified oil change requirement;
  - 54.b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
  - 54.c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
- 55. <u>Applicable Requirement</u>: The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 56. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 56. The analysis program must, at a minimum, analyze the following three (3) parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: [40 CFR 63.6625(j)]
  - 55.a. Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; or
  - 55.b. Viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or
  - 55.c. Percent water content (by volume) is greater than 0.5.
  - 55.d. If all of the condemning limits in Conditions 57.a through 57.c are not exceeded, the permittee is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within 2 business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within 2 business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63.6625(j)]
- 56. <u>Applicable Requirement</u>: The permittee must operate and maintain the stationary RICE and after-treatment control device (if any) according to the manufacturer's emission-related written instructions or develop your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6625(e)(3)]
- 57. <u>Applicable Requirement</u>: The permittee must install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)]

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58. <u>Applicable Requirement</u>: The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to LRAPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]

- 59. Monitoring Requirement: The permittee must operate the emergency stationary RICE according to the requirements in Conditions 61.a through 61.b. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, Subpart ZZZZ, any operation other than emergency operation and maintenance and testing, as described in Conditions 61.a through 61.b, is prohibited. If the permittee does not operate the engine according to the requirements in Conditions 61.a through 61.b, the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]
  - 59.a. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.440(f)(1)]
  - 59.b. The permittee may operate the emergency stationary RICE for any combination of the purposes specified in Condition 61.b.i for a maximum of 100 hours per calendar year. [40 CFR 63.6640(f)(2)]
    - 59.b.i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition LRAPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR 63.6640(f)(2)(i)]
- 60. Recordkeeping Requirement: The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to their own maintenance plan. [40 CFR 63.6655(e)]
- 61. Recordkeeping Requirement: The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR 63.6655(f)]
- 62. Recordkeeping Requirements: The permittee must keep records in a form suitable and readily available for expeditious review according to 40 CFR 63.10(b)(1). As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. The permittee must keep each record readily accessible in hard copy or electronic form for at least 5 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR 63.10(b)(1). [40 CFR 63.6660]
- 63. <u>Applicable Requirement</u>: The permittee must be in compliance with the operating limitations, and other requirements in Conditions 56 through 64 at all times. [40 CFR 63.6605(a)]

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# Standards of Performance for Stationary Compression Ignition Internal Combustion Engines - 40 CFR 60 Subpart IIII

- 64. <u>Applicable Requirement</u>: Permittees that own and operate a 2007 model year and later emergency stationary CI ICE with a displacement of less than 30 liters per cylinder that are not fire pump engines must comply with the emission standards for new nonroad CI engines in 40 CFR 60.4202, for all pollutants, for the same model year and maximum engine power for their 2007 model year and later emergency stationary CI ICE in accordance with Condition 66.a. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4205(b)]
  - 64.a. For engines with a maximum engine power less than 37 kW (50 HP), the engine must be certified for the Tier 2 emission standards for new nonroad CI engines for the appropriate rated power as described in Condition 66.a.i, for all pollutants and the smoke standards as specified in Condition 66.a.ii for model year 2007 engines.
    - 64.a.i. The permittee must comply with the Tier 2 standards as summarized in the following table: [LRAPA 46-535(3)(dddd) and 40 CFR 1039, Appendix I, Table 3 Tier 3 Emission Standards]

Rated Power	Starting	NO <sub>X</sub> +NMHC	CO	PM
(kW)	Model Year	(g/kW-hr)	(g/kW-hr)	(g/kW-hr)
$19 \le kW < 37$	2004	7.5	5.5	0.60

64.a.ii. The permittee must not exceed the following smoke standards: [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)]

64.a.ii.A. 20 percent during the acceleration mode. [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)(1)]

64.a.ii.B. 15 percent during the lugging mode. [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)(2)]

64.a.ii.C. 50 percent during the peaks in either the acceleration or lugging modes. [LRAPA 46-535(3)(dddd) and 40 CFR 1039.105(b)(3)]

- 65. <u>Monitoring Requirement</u>: The permit must demonstrate compliance with Condition 66 by purchasing an engine certified by the manufacturer to meet the emission limitations in Conditions 66.a.i. and 66.a.ii. [LRAPA 32-007 and 32-009(4)]
- 66. <u>Applicable Requirement</u>: The permittee must operate and maintain stationary CI ICE that achieve the emission standards as required in Condition 66 over the entire life of the engine. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4206]
- 67. <u>Applicable Requirement</u>: A permittee that owns and operates a stationary CI ICE subject to 40 CFR part 63 subpart IIII with a displacement of less than 30 liters per cylinder that use diesel fuel must use diesel fuel that meets the requirements of 40 CFR 80.510(b) for nonroad diesel fuel, except that any existing diesel fuel purchased (or otherwise obtained) prior to October 1, 2010, may be used until depleted. Pursuant to 40 CFR 80.510(b)(1)(i), the sulfur content for nonroad diesel fuel may not exceed 15 ppm (0.0015 percent by weight). [LRAPA 44-150(5)(ffff), 40 CFR 60.4207(b) and 40 CFR 80.510(b)(1)(i)]
  - 67.a. Sulfur standard. Maximum sulfur content of 15 ppm. [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(b)]
  - 67.b. Cetane index or aromatic content. Diesel fuel must meet one of the following standards: [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(c)]
    - 67.b.i. Minimum cetane index of 40. [LRAPA 46-535(3)(cccc) and 40 CFR 1090.305(c)(1)]
    - 67.b.ii. Maximum aromatic content of 35 volume percent. [LRAPA 46-535(3)(dddd) and 40 CFR 1090.305(c)(2)]
- 68. <u>Monitoring Requirement</u>: The permittee must meet the monitoring requirements of this condition. In addition, the permittee must also meet the monitoring requirements specified in Condition 71. [LRAPA 46-

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535(3)(cccc) and 40 CFR 60.4209]

- 68.a. A permittee that owns or operates an emergency stationary CI internal combustion engine that does not meet the standards applicable to non-emergency engines must install a non-resettable hour meter prior to startup of the engine. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4209(a)]
- 69. <u>Monitoring Requirement</u>: The permittee must meet the following compliance requirements: [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211]
  - 69.a. A permittee that must comply with the emission standards specified in 40 CFR part 60 subpart IIII must do all of the following, except as permitted under Condition 71.d.: [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)]
    - 69.a.i. Operate and maintain the stationary CI internal combustion engine and control device according to the manufacturer's emission-related written instructions; [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)(1)]
    - 69.a.ii. Change only those emission-related settings that are permitted by the manufacturer; and [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)(2)]
    - 69.a.iii. Meet the requirements of 40 CFR part 1068, as they apply. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(a)(3)]
  - 69.b. A permittee that owns or operates a 2007 model year and later stationary CI internal combustion engine must comply with the emission standards specified in Condition 66, and must comply by purchasing an engine certified to the emission standards in Condition 66, for the same model year and maximum (or in the case of fire pumps, NFPA nameplate) engine power. The engine must be installed and configured according to the manufacturer's emission-related specifications, except as permitted in under Condition 71.d. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(c)]
  - 69.c. The permittee must operate the emergency stationary ICE according to the requirements in Conditions 71.c.i. through 71.c.ii. In order for the engine to be considered an emergency stationary ICE under 40 CFR part 60 subpart IIII, any operation other than emergency operation and maintenance and testing, as described in Conditions 71.c.i. through 71.c.ii., is prohibited. If the permittee does not operate the engine according to the requirements in Conditions 71.c.i. through 71.c.ii., the engine will not be considered an emergency engine under 40 CFR part 60 subpart IIII and must meet all requirements for non-emergency engines. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)]
    - 69.c.i. There is no time limit on the use of emergency stationary ICE in emergency situations. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)(1)]
    - 69.c.ii. The permittee may operate the emergency stationary ICE for any combination of the purposes specified in Condition 71.c.ii.A. for a maximum of 100 hours per calendar year. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)(2)]
      69.c.ii.A. Emergency stationary ICE may be operated for maintenance check

Emergency stationary ICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition LRAPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state, or local standards require maintenance and testing of emergency ICE beyond 100 hours per calendar year. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(f)(2)(i)]

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69.d. If the permittee does not install, configure, operate, and maintain the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes emission-related settings in a way that is not permitted by the manufacturer, the permittee must demonstrate compliance as follows: [LRAPA 46-535(3)(dddd) and 40 CFR 60.4211(g)] 69.d.i. If the permittee owns or operates a stationary CI internal combustion engine with maximum engine power less than 100 HP, the permittee must keep a maintenance plan and records of conducted maintenance to demonstrate compliance and must, to the extent practicable, maintain and operate the engine in a manner consistent with good air pollution control practice for minimizing emissions. In addition, if the permittee does not install and configure the engine and control device according to the manufacturer's emission-related written instructions, or the permittee changes the

emission-related settings in a way that is not permitted by the manufacturer, the permittee must conduct an initial performance test to demonstrate compliance with the applicable emission standards within one (1) year of such action. [LRAPA 44-

70. <u>Notification, Reporting and Recordkeeping Requirement</u>: The permittee must meet the following notification, reporting, and recordkeeping requirements: [LRAPA 44-150(5)(ffff) and 40 CFR 60.4214]

150(5)(ffff) and 40 CFR 60.4211(g)(2)]

- 70.a. If the stationary CI internal combustion engine is an emergency stationary internal combustion engine, the permittee is not required to submit an initial notification. Starting with the model years in Table 5 to 40 CFR part 60 subpart IIII, if the emergency engine does not meet the standards applicable to non-emergency engines in the applicable model year, the permittee must keep records of the operation of the engine in emergency and non-emergency service that are recorded through the non-resettable hour meter. The permittee must record the time of operation of the engine and the reason the engine was in operation during that time. [LRAPA 46-535(3)(dddd) and 40 CFR 60.4214(b)]
- 71. <u>Recordkeeping Requirement</u>: The permittee must keep documentation that the engine is certified by the manufacturer to meet the emission limitations in Conditions 66.a.i. and 66.a.ii. [LRAPA 34-016]

#### **Insignificant Activities Specific Emission Limits and Standards**

- 72. 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 LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the applicable requirements that could apply to IEUs are incorporated as follows:
  - 72.a.  $LRAPA\ 32-010(3) 20\%$  opacity for a period or periods as a six-minute block average in any hour for sources other than wood fired boilers.
  - 72.b. LRAPA 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.
  - 72.c. LRAPA 32-015(2)(c) 0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified after April 16, 2015.
  - 72.d. LRAPA 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.
  - 72.e. LRAPA 32-030(1)(a) 0.10 gr/dscf corrected to 12% CO<sub>2</sub> (wood fuel) or 50% excess air (fuels other than wood) for fuel burning equipment.
  - 72.f. LRAPA 32-030(1)(a)&(3)(b) 0.10 gr/dscf for fuel burning equipment sources installed,

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- constructed, or modified after April 16, 2015. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 12% CO<sub>2</sub> (wood fuel) or 50% excess air (fuels other than wood).
- 72.g. LRAPA 32-045 process weight limit for non-fugitive, non-fuel burning process equipment.
- 73. <u>Testing, Monitoring, and Recordkeeping Requirements</u>: 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 ODEQ's Source Sampling Manual.

# PLANT SITE EMISSION LIMITS

74. The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040, 42-0041 and 42-0060]

#### **Annual (12-month rolling) PSELs (tons)**

Pollutant	Plant Site Emission Limit (tons/year)	Unassigned Emissions (tons/year)	Emission Reduction Credits (tons/year)
PM	33	7.4	0
PM <sub>10</sub>	33	1.4	0
PM <sub>2.5</sub>	13	0	0
CO	172	0	0
NO <sub>x</sub>	48	0	0
$SO_2$	6.0	0	0
VOC	50	40	0
GHG as CO <sub>2</sub> e	40,293	0	0

- 74.a. The permittee may only use unassigned emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by LRAPA.
- 74.b. Compliance with the GHG PSEL is determined through the reporting required by Condition 85, as applicable.
- 75. <u>Monitoring Requirement</u>: The permittee must determine compliance with the PSELs using the following monitoring and calculation procedures: [LRAPA 35-0120, 42-0080 and OAR 340-218-0050(3)(a)]
  - 75.a. The permittee must monitor and maintain records of the following process parameters:

Emissions Unit(s)	Process Parameter	Units	Measurement Frequency
Veneer Drying Operations	Veneer Dried - Square Footage &	1000 Square Feet	Daily
(EU-01)	Thickness	(MSF 3/8" basis)	
East Fuel Cell (EU-01A)	Wood Fuel Used	Tons	Weekly
Plywood Production	Plywood Production - Square	1000 Square Feet	Daily
(EU-02)	Footage & Thickness	(MSF 3/8" basis)	

Emissions Unit(s)	Process Parameter	Units	Measurement Frequency
Finishing Line (EU-03)	Finishing Line Material Usage & SDS	Gallons	Monthly
Wood Residuals Conveying System A (EU-04)	Conveying System A	Hours of Operation	Per Shift
Wood Residuals Conveying System B (EU-05)	Conveying System B	Hours of Operation	Per Shift
Unpaved Road Emissions (EU-07)	Unpaved Road Emissions	Fixed Value*	Annual
West Fuel Cell (EU-08)	Wood Fuel Used	Tons	Weekly
Hogged Fuel Pile (EU-09)	Bone Dry Tons Stored	BDT	Monthly
Putty Patching Operations (EU-10)	Material Usage	Gallons	Monthly

<sup>\*</sup>VMT may be estimated based on previous calendar year VMT ratio to production.

#### **Recordkeeping of Process Parameters**

75.b. **By the 15<sup>th</sup> of each month**, the permittee must determine compliance with the PSELs by calculating 12-month rolling emissions for each emissions units for all pollutants except GHGs by the end of the following month using the following formula and process parameters listed in Condition 77.a, and the emission factors listed in Condition 78:

$$E = \sum_{i=1}^{12} [P_{eu_i} \times EF_{eu} \times K] + AIA$$

where: E = pollutant emissions in tons/yr.

 $\sum_{i=1}^{12}$  = symbol representing "summation of" with limits defined from current calendar month i=1 to preceding twelve months at i=12.

 $P_{eu_i}$  = process parameter identified in Condition 77.a for calendar month i.

EF<sub>eu</sub> = emission factor identified for each emissions unit and pollutant in

Condition 78.

K = conversion constant is 1 ton/2000 lbs for annual emissions

calculations.

AIA = The permittee must add one (1) ton of emissions to the 12-month rolling PSEL calculation for PM, PM<sub>10</sub>, PM<sub>2.5</sub>, NO<sub>X</sub>, CO, SO<sub>2</sub>, and VOC to account for aggregate insignificant emissions in EU-AGG

76. The permittee must use the following emission rates or emission factors in the table below in the equation in Condition 77 for calculating the 12-month rolling emissions to demonstrate compliance with the PSELs, unless alternative emission rates or emission factors are approved by LRAPA. The permittee may request the use of alternative emission rates or emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors). The use of alternative emission rates or emission factors is not allowed until the alternative emission rates or emission factors have been reviewed and approved by LRAPA using procedures in title 34 and/or title 37, as appropriate. [LRAPA 34-016(1) and 42-0080(4)(c)]

# **Emission Factors Used for Calculating Emissions**

Emission Unit ID	Emission Unit Description	Pollutant	Emission Factor or Rate	Emission Factor Units	Process Parameters	Emission Factor Verification Testing Condition
		$PM/PM_{10}$	0.423	Lb/MSF (3/8")	Veneer Dried	No
		$PM_{2.5}$	0.106	Lb/MSF (3/8")	Veneer Dried	No
EU-01	Veneer Drying	CO	1.77	Lb/MSF (3/8")	Veneer Dried	No
and EU-	Operations and	$NO_X$	0.406	Lb/MSF (3/8")	Veneer Dried	No
01A	East Fuel Cell	$SO_2$	0.22	Lb/Ton	Wood Combustion	No
		VOC	0.556	Lb/MSF (3/8")	Veneer Dried	Yes, once per term
		PM/PM <sub>10</sub>	0.011	Lb/MSF (3/8")	Square Feet Pressed	No
EU-02	Plywood Production	PM <sub>2.5</sub>	0.010	Lb/MSF (3/8")	Square Feet Pressed	No
		VOC	0.1027	Lb/MSF (3/8")	Square Feet Pressed	Yes, once per term
EU-03	Finishing Line	VOC	SDS/MB	Tons/year	Annual Emissions	No
EII 04	Wood Residuals	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	0.012	Lb/MSF (3/8")	Square Feet Pressed	No
EU-04	Conveying System A	VOC	0.014	Lb/MSF (3/8")	Square Feet Pressed	No
EU-05	Wood Residuals Conveying System B	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	2.43	Tons/year	Annual Emissions	No
	•	PM	1.46	Tons/year	Annual Emissions	No
EU-07	Unpaved Road Emissions	$PM_{10}$	0.42	Tons/year	Annual Emissions	No
		PM <sub>2.5</sub>	0.04	Tons/year	Annual Emissions	No
		PM/ PM <sub>10</sub>	0.39	Lb/BDT	Wood Combusted	No
		$PM_{2.5}$	0.35	Lb/BDT	Wood Combusted	No
EU-08	West Fuel Cell	CO	17.2	Lb/BDT	Wood Combusted	No
EO-08		$NO_x$	6.1	Lb/BDT	Wood Combusted	No
		$SO_2$	0.45	Lb/BDT	Wood Combusted	No
		VOC	1.2	Lb/BDT	Wood Combusted	No
	Hogged Fuel	PM/ PM <sub>10</sub>	0.24	Lb/BDT	Material Moved	No
EU-09	Hogged Fuel Pile	PM <sub>2.5</sub>	0.036	Lb/BDT	Material Moved	No
		VOC	0.33	Lb/BDT	Material Moved	No
EU-10	Putty Patching Operations	VOC	SDS/MB	Lb/gal	Putty Used	No
		$PM/PM_{10}/PM_{2.5}$	1	Ton/year	Annual Emissions	No
	Aggregate	VOC	1	Ton/year	Annual Emissions	No
EU-AGG	Insignificant Activities	CO	1	Ton/year	Annual Emissions	No
		$NO_x$	1	Ton/year	Annual Emissions	No
		$SO_2$	1	Ton/year	Annual Emissions	No

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# GENERAL TESTING REQUIREMENTS

77. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ's *Source Sampling Manual*. [LRAPA 35-0120, 35-0140, and OAR 340-218-0050(3)(a)]

- 77.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the *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.
- 77.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.
- 77.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
  - 77.c.i. At least 90% of the maximum design capacity for initial performance tests on new or modified equipment; or
  - 77.c.ii. At least 90% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as no less than 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. Average hourly operating rates can be determined by taking daily operating data and dividing by the number of hours of operation.
  - 77.c.iii. For purposes of this permit, the normal maximum operating rate is defined as the 90<sup>th</sup> 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.
- 77.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.
- 77.e. Source test reports prepared in accordance with the DEQ's *Source Sampling Manual* must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

# GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

## 78. Monitoring Requirements:

- 78.a. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
- 78.b. 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)]
- 78.c. Monitoring requirements must commence on the date of permit issuance unless otherwise

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specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

# 79. <u>Recordkeeping Requirements</u>:

79.a. The permittee must maintain the following general records of testing and monitoring required by this permit: [LRAPA 34-016(1) and OAR 340-218-0050(b)(A)]

79.a.i. the date, place as defined in the permit, and time of sampling or measurements;

79.a.ii. the date(s) analyses were performed;

79.a.iii. the company or entity that performed the analyses;

79.a.iv. the analytical techniques or methods used;

79.a.v. the results of such analyses;

79.a.vi. the operating conditions as existing at the time of sampling or measurement; and the records of quality assurance for continuous monitoring systems (including but not

limited to quality control activities, audits, calibration drift checks).

- 79.b. 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, OAR 340-214-0114 and OAR 340-218-0050(3)(b)]
- 79.c. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
- 79.d. 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. All existing records required by the previous Air Contaminant Discharge Permit must also be retained for five (5) years. [LRAPA 34-016 and OAR 340-218-0050(b)(B)]

# REPORTING REQUIREMENTS

- 80. The permittee must submit three (3) copies of reports of any required monitoring at least every six (6) months, completed on forms approved by LRAPA. Six-month periods are January 1 to June 30, and July 1 to December 31. Two copies of the report must be submitted to LRAPA and one copy to EPA Region 10. All instances of deviations from permit requirements must be clearly identified in such reports.

  [OAR 340-218-0050(3)(c)(A) and OAR 340-218-0080(6)(d)]
  - 80.a. The first semi-annual report must be received *by August 15* and must include the semi-annual compliance certification. [OAR 340-218-0080]
  - 80.b. The annual report must be received **by March 15** and must consist of the following:

80.b.i. The emission fee report; [OAR 340-220-0100]

80.b.ii. The excess emissions upset log; [LRAPA 36-025]

80.b.iii. The second semi-annual compliance certification; [OAR 340-218-0080]

80.b.iv. The annual certification that the risk management plan is being properly implemented

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or confirmation that the risk management plan requirements have not been triggered; [OAR 340-218-0080(7)]

80.b.v. The parameters and calculations required by Condition 77; and 80.b.vi. Boiler NESHAP compliance report as required by Condition 51.

- 81. 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)]
  - 81.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 81.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). 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;
  - 81.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 83.b. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12, occurred;
  - 81.d. Such other facts as LRAPA may require to determine the compliance status of the source; and
  - 81.e. Number of CAM excursions and corrective action.
- 82. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-00500(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)].
- 83. <u>Greenhouse Gas Reporting</u>: If the calendar year emission rate of greenhouse gases (CO<sub>2</sub>e) 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 *by March 31* of each year in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(1). [OAR 340-215-0040 and OAR 340-215-0046(1)(a)]
- 84. <u>Excess Emissions Reporting</u>: The permittee must report all excess emissions as follows: [LRAPA 36-010, 36-025(1) and OAR 340-218-0050(3)(c)]
  - 84.a. Immediately (within one (1) hour after the permittee knew or should have known of an excess emission period) the permittee must notify LRAPA by telephone, email, facsimile, or in person of any excess emission; and
  - 84.b. Within 15 days of the excess emissions event, the permittee must submit a written report that contains the following information: [LRAPA 36-025(1)]
    - 84.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;
    - 84.b.ii. The date and time the owner or operator notified LRAPA of the event;
    - 84.b.iii. The equipment involved;

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84.b.iv. Whether the event occurred during startup, shutdown, maintenance, or as a result of a breakdown, malfunction, or emergency;

84.b.v. Steps taken to mitigate emissions and corrective actions taken;

84.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:

84.b.vii. The final resolution of the cause of the excess emissions; and

84.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to an emergency pursuant to LRAPA 36-040.

- 84.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.
- 84.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 in 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.
- 84.e. 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 86.a.
- 84.f. The permittee must continue to maintain a log of all excess emissions in accordance with LRAPA 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)]
- 85. 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 86. [OAR 340-218-0050(3)(c)(B)]
- 86. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
- 87. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
- 88. Reports must be sent to the following regulatory agency addresses, unless otherwise instructed:

Lane Regional Air Protection Agency 1010 Main Street Springfield, OR 97477 Enforcement and Compliance Assurance Division Region 10 (20-C04) U.S. Environmental Protection Agency 1200 Sixth Avenue, Suite 155 Seattle, WA 98101 Murphy Company – Prairie Road Panelboard Plant
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# NON-APPLICABLE REQUIREMENTS

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

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 60, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	These standards do not apply because the boiler (West Fuel Cell) in EU-08 was installed at the facility prior to the rule-specified applicability date of June 9, 1989.
40 CFR Part 63, Subpart DDDD	Emission Standards for Hazardous Air Pollutants: Plywood and Composite Wood Products	The permittee obtained synthetic minor HAP restrictions prior to the compliance date.
40 CFR Part 63, Subpart DDDDD	National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters	The permittee obtained synthetic minor HAP restrictions prior to the compliance date.

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#### 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. <u>Masking Emissions:</u>

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.

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# 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. <u>Certification</u> [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(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. <u>Outdoor Burning</u> [LRAPA Title 47]

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

G9. <u>Asbestos</u> [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).

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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. <u>Inspection and Entry</u> [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.

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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. <u>Minor Permit Modification</u> [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.

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# 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).

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# 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 Murphy Company – Prairie Road Panelboard Plant

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# **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 will be requested to voluntarily curtail or eliminate all unnecessary operations within the designated *Alert Area*, and public transportation systems will 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 will be taken in the designated area:

- 1. There will be no open burning by any person of any material.
- 2. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing will 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 will 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> <li>1)</li> <li>2)</li> <li>3)</li> </ol>	Utilization of electric generating fuels having low ash and sulfur content.  Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.  Diverting electric power generation to facilities outside of <i>Alert Area</i> .
В.	Coal, oil, or wood-fired process steam generating facilities.	1) 2)	Utilization of fuel having low ash and sulfur content.  Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.
		3)	Substantial reduction of steam load demands consistent with continuing plant operations.

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	Source of Contamination		Control Actions — Alert Level
C.	Manufacturing industries of the following classifications:  - Primary Metals Industries	1)	Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations.
	<ul> <li>Petroleum Refining</li> <li>Chemical Industries</li> <li>Mineral Processing Indus.</li> <li>Grain Industries</li> </ul>	2)	Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance.
	- Paper and Allied Products - Wood Processing Industry	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 or carbon monoxide or ozone, the following measures must be taken:

- 1. Operation of motor vehicles carrying fewer than three (3) persons will 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 will, 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 will 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).

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5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists, governmental agencies will 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 will be taken:

- 1. There will be no open burning by any person of any material.
- 2. The use of incinerators for the disposal of solid or liquid wastes will be prohibited.
- 3. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing will perform such operations only between the hours of 12 noon and 4 p.m.
- 4. Where legal authority exists, governmental agencies will 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 will 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.	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 <i>Warning Area</i> .
		4)	Prepare to use a plan of action if an <i>Emergency Condition</i> develops.
		5)	Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
В.	Coal, oil, or wood-fired process steam generating facilities.	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.
		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.

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	Source of Contamination		Control Actions — Warning Level
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	<ol> <li>1)</li> <li>2)</li> <li>3)</li> <li>4)</li> </ol>	Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.  Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.  Maximum reduction of heat load demands for processing.  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 will be no open burning by any person of any material.
- 2. The use of incinerators for the disposal of solid or liquid wastes will be prohibited.
- 3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture will 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;

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- 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 will 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 will be closed to all except emergency air traffic.
- 7. Where legal authority exists, governmental agencies will prohibit all use of wood stoves and fireplaces.
- 8. Any person responsible for the operation of a source of atmospheric contamination listed below will take all required control actions for this *Emergency Level*.

	Source of Contamination		Control Actions — Emergency Level
A.	Coal, oil, or wood-fired electric power generating facilities.	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.
В.	Coal, oil, or wood-fired steam generating facilities.	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.

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	Source of Contamination		Control Actions — <i>Emergency Level</i>
C.	Manufacturing industries of the following classifications:  - Primary Metals Industry - Petroleum Refining Operations - Chemical Industries - Mineral Processing Industries - Paper and Allied Products - Grain Industry	2)	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.  Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.
	- Wood Processing Industry	3)	Maximum reduction of heat load demands for processing.  Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

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