

Lane Regional Air Pollution Authority
Air Contaminant Discharge Permit

REVIEW REPORT

Armstrong Wood Products Inc.

Permit No. 200030

1. Lane Regional Air Pollution Authority (LRAPA) has reviewed the Air Contaminant Discharge Permit (ACDP) application submitted by Armstrong Wood Products Inc. (Armstrong). The contents of the application and subsequent correspondence with the source were the basis for the calculations contained within this review report.

2. Source Background and Description

Armstrong Wood is a secondary wood products re-manufacturing operation which began as a "garage shop" operation in late 1978. It grew and relocated to its current location at 48513 Highway 58 in Oakridge, Oregon, (the old Pope and Talbot mill) in 1992. It consists of saws, edgers and molder/planers, making 2x4s, stakes, lath, etc. from "peeler cores" and other green stock. All material processed by Armstrong is green. The operation currently runs two (2) shifts, four (4) days per week, 50 weeks per year. The processes generate sawdust and planer shavings that are pneumatically transferred to two (2) cyclones that remove the sawdust and shavings from the airstream, dropping them into bins and subsequently into trucks for transport. The operation currently generates about 7000 bone dry tons (BDT) per year with particulate emissions of less than two (2) tons per year (TPY). The Baseline Emission Rate (BER) is zero (0) TPY. Armstrong operates a sawmill and planing operation (SIC Code 2421).

3. The source consists of the following operations and control devices:

- Saws
- Planers
- Molders
- Other machinery associated with wood products manufacturing.

Dust from this machinery is collected by a central dust collection system that is routed through the cyclones before being emitted to the atmosphere.

4. This source is located in an area which is a non-attainment area for PM and PM₁₀ and an attainment area for all other criteria pollutants.
5. This source is located within 100 kilometers of four (4) Class I air quality protection areas.
6. The Land Use Compatibility Statement was issued on August 25, 1999, by the City of Oakridge.
7. This source is not subject to New Source Review (NSR) for PM₁₀.
8. This source is not subject to Prevention of Significant Deterioration (PSD) for the affected criteria pollutants.

Emissions Information

10. The Plant Site Emissions Limit (PSEL) for PM and PM₁₀ is based on throughput and control efficiency of the baghouse and cyclone.

Using an emission factor of .05 pound per BDT of throughput and using 7,000 BDT of throughput, the annual emissions are estimated at 1.75 TPY and the hourly emissions are estimated at 1 pound per hour. The hourly emissions estimate is an average based on 3500 hours production per year.

History of Changes to Plant Site Emissions Limit (PSEL)

11. No PSELS were established for this facility.

Baseline Emission Rate (BER)

12. The BER has been set at 0 tons per year. According to the DEQ/AQ Permitting and Inspection Manual: "The Baseline Emissions Rate for sources constructed after 1978 is zero because they were not contributing to ambient concentrations during baseline year."

Baseline Year 1978:

PM	=	0 TPY
PM ₁₀	=	0 TPY

DJ/bp
11/22/99