

Lane Regional Air Pollution Authority  
Air Contaminant Discharge Permit

**REVIEW REPORT**

Real Wood Products Co.

Permit No. 207069

1. General Background Information

Real Wood Products manufactures lattice, decking, and ornamental wood products at two properties in Eugene: 90 Foch Street and 2210 Cross Street. The facilities also remanufacture undried cedar wood and white wood products. The operating schedule for each of the two (2) sources is 2000 hours per year (8 hours per day, 5 days per week, and 50 weeks per year). The pollutants emitted from the source are particulate matter (PM) in the form of total suspended particulate (TSP), particulate matter less than 10 micrometers in diameter (PM<sub>10</sub>), and volatile organic compounds (VOCs).

2. History of Source and Baseline Emissions

The source has existed in its present location since 1979. Prior to that time, it was located in Springfield, Oregon. The source was first issued an air contaminant discharge permit (ACDP) in 1983. Because the source was operated at a different location during the baseline period, the baseline emissions for the current facility are zero (0) for all pollutants.

3. Emissions Unit Identification

The emission units regulated by this permit are three cyclones that are used to collect airborne wood waste from the manufacture of lattice, decking, and ornamental wood products.

4. Reasons for Permit Issuance

The company's ACDP expired on July 31, 1997. The primary reason for the permit issuance is to renew the expired permit. The new permit includes a change in permit type from Regular to Minimal. Additionally, the record keeping of coatings usage has been removed since the coatings used (white latex paint and cedar latex stain) contain less than 1.5 percent by weight of VOC. The source operates a process listed in Table A, Part II, of LRAPA Rule 34 (Category 13 - Mill work (including kitchen cabinets and structural wood members) 25,000 or more board feet per shift). A Minimal permit is appropriate for this source on the basis of emissions; a Regular permit could be required if it is later determined that the source requires additional compliance oversight.

5. Enforcement Actions

A Notice of Violation (NOV) was issued to the company on May 15, 1979. The NOV was issued because the company constructed a strip paneling plant and associated air transport system without obtaining prior LRAPA approval. LRAPA has not taken any enforcement actions against the facility during since the issuance of the last permit.

6. Emission Calculations



Cyclone	Throughput (BDT/yr*)	TSP Emission Factor (lb/BDT)	TSP Emissions (ton/year)	PM <sub>10</sub> Fraction	PM <sub>10</sub> Emissions (ton/year)
#1	6.0	0.5	3.0	0.5	1.5
#2	6.0	0.5	3.0	0.5	1.5
#3	6.0	0.5	3.0	0.5	1.5
Total	18		9.0		4.5

\* BDT: Bone Dry Tons

\*\* SER: Significant Emission Rate in LRAPA Title 38.

7. Emission Limits

LRAPA's process weight rule specifies limits on the emissions or particulate matter for specific processes as a function of the amount of material processed. [LRAPA 32-045(A)] The cumulative maximum hourly design process rate for the three cyclones is:

$$3 \times 1500 \text{ tons/year} \times 2000 \text{ lbs/ton} \times \text{year}/2000 \text{ hours} = 4500 \text{ lbs/hr}$$

The Title 32, Table I, limit corresponding to this process weight is 6.3 pounds per hour. This is equivalent to 50 pounds per day. This PM emissions allowable is higher than the expected actual emissions of 4.5 pounds per day calculated above.

Visible emissions, except for uncombined water, from the cyclones must not exceed 20% opacity. [LRAPA 32-010]

8. Hazardous Air Pollutants

The HAP emissions from the source are expected to be minimal.

9. Typically Achievable Control Technology (TACT)

LRAPA Title 32 requires an existing source to meet TACT if the source is required to have a permit and would have emissions of criteria pollutants greater than 10 tons per year of any gaseous pollutant or five tons per year of particulate. The source does not satisfy these criteria and, therefore, is not required to meet TACT.

10. New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

Because the emissions for all regulated pollutants are below the Significant Emission Rates (SERs) in LRAPA Title 38, the source is not subject to the NSR requirements.

11. Monitoring Compliance

In addition to the general requirement that the source provide the highest and best practicable treatment and control of air contaminant emissions, the permit contains a requirement to monitor product throughput.

12. Production Limits

In order to ensure that the source stays within the limits stated in the application for permit renewal, the source's production will be limited to 1500 tons/year for each cyclone, and 4500 tons per year for the entire facility. The permit requires the source to record the following information:

- a) monthly throughput for each cyclone;
- b) total monthly throughput for the plant;
- c) annual throughput for each cyclone; and
- d) total annual throughput for the plant.

All information shall be recorded in bone dry tons. The annual average throughput values must be calculated by the end of February by adding the monthly throughput from January to December. This approach is justified since the source receives monthly invoices of the amount of material removed from each cyclone.

13. Public Notice

The draft permit was placed on public notice from September 3, 2000, to October 4, 2000. No written comments were received during this comment period.