

Lane Regional Air Protection Agency
Minimal Source Air Contaminant Discharge Permit

REVIEW REPORT

Sundance Lumber Company, Inc.

Permit No. 203504

PERMITTING

Permitting Action

1. This permit is a renewal for an existing Air Contaminant Discharge Permit which was issued on January 1, 2003, and scheduled to expire on December 31, 2007.

Other Permits

2. No other permits have been issued or are required by LRAPA for this facility.

Attainment Status

3. The facility is located in an attainment area for all pollutants except PM₁₀ (particulate matter less than 10 microns in size). The Eugene/Springfield Air Quality Management Area is a non-attainment area for PM₁₀.

SOURCE DESCRIPTION

Overview

4. The permittee operates a green fir (and formerly cedar) dimensional lumber mill at 1001 North 35th Street in Springfield. The facility controls PM (particulate matter)/PM₁₀ emissions by the use of four (4) cyclones and one (1) target box. Total annual production of finished product for the facility in 2006 was approximately 46 million board feet. The facility was issued its first ACDP in 1978. Baseline Emissions were not set in the permit because the facility is well below the Significant Emission Rates as listed in Title 38 of LRAPA's Rules and Regulations. The facility operates 2,450 hours per year (10 hours per day, 5 days per week, 49 weeks per year).

Process and Control Devices

5. Existing air contaminant sources at the facility consist of the following:

a. **Cyclone M (M1)**

This is a cyclone that controls emissions from a lumber planer. The annual throughput of wood waste materials in the form of shavings is 3,900 BDT (Bone Dry Tons).

b. **Cyclone O (O1)**

This is a cyclone that controls emissions from a fence machine. The annual throughput of wood waste materials in the form of sawdust is 50 BDT.

c. **Cyclone I (I1)**

This is a cyclone that controls emissions from a small refuse wood chipper. The annual throughput of wood waste materials in the form of chips is 4,000 BDT.

d. **Target Box J (J1)**

This is a target box controlling emissions from a rechipper. The annual throughput of wood waste in the form of chips is 2,100 BDT.

e. **In-line Spray Box and De-mister (R1)**

The spray box applies a fungicide mist to the dimensional lumber. Approximately 900 gallons of the fungicide is applied yearly. Active ingredient in fungicide is propiconazole which does not appear on the list of Hazardous Air Pollutants (HAPs).

f. **Headsaw Sawdust Cyclone (C1)**

This is a cyclone controlling emissions from a headsaw bandmill. The annual throughput of wood waste in the form of sawdust is 4040 BDT.

EMISSIONS

6. The pollutant(s) of concern associated with this source type are PM. Emissions of PM are estimated to be 1.3 tons per year. Volatile Organic Compound (VOC) and HAP emissions are summarized in the facility's application; however the emission sources are from on-site fuel usage (diesel, gasoline and antifreeze). The other criteria pollutants are emitted at negligible levels. Emission calculation details are as follows:

Device/Process	Pollutant	Annual Throughput	Emission Factor (lb PM/BDT)*	Emissions lbs/yr
Cyclone M1	PM	3,900	0.2	780
Cyclone O1	PM	50	0.2	10
Cyclone I1	PM	4,000	0.2	800
Cyclone C1	PM	4,040	0.2	808
Target Box J1	PM	2,100	0.1	210
TOTAL				2,608 = 1.3 tons/yr

* from DEQ *Permitting and Inspection Manual*

MINIMAL PERMIT DETERMINATION

7. The Agency has determined that the facility qualifies as a minimal source for the following reasons:
- a. Emissions from this facility are estimated to be less than 5 tons per year of particulate matter and less than 10 tons per year for the criteria gaseous pollutants.

- b. The facility was inspected on January 24, 2008, and found to be in compliance with permit conditions.

SPECIAL CONDITIONS

8. There are no special conditions specified in the permit.

NESHAPS/MACT APPLICABILITY

9. There are no sources at this facility for which NESHAPS/MACT standards have been promulgated.

NSPS APPLICABILITY

10. There are no sources at this facility for which NSPS standards have been promulgated.

PUBLIC NOTICE

11. The draft permit was on public notice from March 18, 2008 to April 17, 2008. No written comments were submitted during the 30-day comment period

MKH/RCL
04/18/08