

Lane Regional Air Protection Agency
Minimal Air Contaminant Discharge Permit

REVIEW REPORT

Swanson Brothers Lumber Co., Inc.

Permit No. 207450

1. General Background Information

Swanson Brothers Lumber Co., Inc. operates a planing mill in Noti, Oregon, that processes 100 to 150 thousand board feet per shift. The operating schedule for the facility is 2000 hours per year (8 hours per day, 5 days per week, and 50 weeks per year). The pollutant emitted from the facility is particulate matter (PM), in the form of total suspended particulate (TSP) and particulate matter less than 10 micrometers in diameter (PM₁₀).

2. History of Facility and Baseline Emissions

The facility has existed in its present location since the 1930s. The planing mill and cyclone were installed in the early 1970s and replaced with new equipment in 1990. The facility was first issued an air contaminant discharge permit (ACDP) in 1978. The baseline emissions for the facility are probably close to the current emissions. Therefore, the baseline PM emission rate for the facility will be equal to the PM emissions estimated in this review.

3. Emissions Unit Identification

The emission unit regulated by this permit is a wood planer and cyclone.

4. Reasons for Permit Issuance

The facility's ACDP expired on December 31, 2007. The primary reason for the permit issuance is to renew the expired permit. The facility operates a process listed in category 10(a) (planing mill with 25,000 or more board feet per shift) of Table A, Part II, of LRAPA Rule 34.

5. Enforcement Actions

There have been no enforcement actions taken against the facility.

6. Performance Test Results

There has been no performance testing completed at the facility.

7. Plant Site Emission Limits (PSELs)

The emissions of PM from the facility were estimated using the maximum expected throughput for the cyclone and the Oregon Department of Environmental Quality (OR DEQ) emission factor and PM₁₀ fraction for medium-efficiency cyclones. Based on shipping receipts summed for the previous renewal, the amount of material processed through the cyclone ranges from 40 to 160 bone dry

tons (BDT) per month. In order to allow the facility operational flexibility, a value of 200 tons per month was selected as the maximum expected throughput for the cyclones. This is equivalent to 2,400 tons per year. The calculations are contained in the following table.

Device/Process	Pollutant	Annual Throughput	PM/PM10 Emission Factor (lb PM/BDT)	Emissions lbs/yr
Cyclone	PM	2,400	0.5/0.25	1,200 for PM 600 for PM10

Based on the quantity of its emissions, the facility qualifies for a minimal permit. Therefore, Plant Site Emission Limits (PSELs) are not required to be established in the permit.

8. Other Emission Limitations

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

$$2400 \text{ tons/year} \times 2000 \text{ lbs/ton} \times \text{year}/2000 \text{ hours} = 2400 \text{ lbs/hr}$$

The Title 32, Table I, limit corresponding to this process weight is 4.55 pounds per hour. Based on an operating schedule of 2000 hours per year, this is equivalent to 4.55 tons per year. Since the maximum expected PM emissions from the source are 0.6 tons per year, the facility need not demonstrate compliance with the process weight rule.

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

PM emissions must not exceed 0.1 grain/dscf. [LRAPA 32-015(2)]

9. Hazardous Air Pollutants (HAP)

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

10. Typically Achievable Control Technology (TACT)

LRAPA Title 32 requires an existing facility to meet TACT if the facility is required to have a permit and would have emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutant or five (5) tons per year of particulate. The facility does not satisfy these criteria and, therefore, is not required to meet TACT.

11. 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 facility is not subject to the New Source Review (NSR) requirements.

12. Continuous Compliance

Except for the general requirement that the facility provide the highest and best practicable treatment and control of air contaminant emissions, the permit contains no specific compliance parameters to be monitored to ensure that the PSELs are not exceeded.

13. Production Limits

The permit contains no production limits.

14. Public Notice

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.