

**LANE REGIONAL AIR POLLUTION AUTHORITY**  
1010 Main Street, Springfield, Oregon 97477  
(541) 736-1056

**SYNTHETIC MINOR AIR CONTAMINANT DISCHARGE PERMIT**  
**(SM-ACDP)**

Issued in accordance with provisions of Title 34, Lane Regional  
Air Pollution Authority Rules and Regulations and based on the  
land use compatibility findings included in the permit record.

Issued to:

**Georgia-Pacific Resins, Inc.**  
2665 Highway 99 North  
Eugene, Oregon 97402

Land Use Compatibility Statement:

From: City of Eugene  
Dated: November 25, 1996

Mailing Address:

2665 Highway 99 North  
Eugene, Oregon 97402

Fee Basis:

Table A, Part II  
28a Synthetic Resin Manufacturing,  
<250,000 tpy of product  
58c Fuel-Burning Equipment,  
>10 and <100 million BTU/hour

Permit Number: 203129

Permit Type: Synthetic Minor

SIC: 2821 Synthetic Resin  
Manufacturing  
4961 Combustion Source

Date Renewed: August 2, 2000

Expiration Date: August 1, 2005

Specific Emission Points:

Emission Points are identified in  
Permit Condition 2.

Issued

By: \_\_\_\_\_  
Brian L. Jennison, Ph.D., Director

Effective

Date: \_\_\_\_\_

Permitted Activities

1. Until this permit expires or is revoked, the permittee is herewith allowed to discharge exhaust gases containing contaminants only in accordance with the permit application and the requirements, limitations, and conditions contained in this permit. This specific listing of requirements, limitations, and conditions does not relieve the permittee from complying with all other rules of Lane Regional Air Pollution Authority (LRAPA).

Emission Unit (EU) and Pollution Control Device (PCD) Identification

2. The emissions units regulated by this permit are provided below.

**Current Plant Configuration**

Emissions Unit*	Pollution Control Device/Practice
Formaldehyde Storage	None
Methanol Storage	Vapor Balance
Phenol Storage	None
Epichlorohydrin Storage	Vapor Balance
UFC (Urea-formaldehyde concentrate) /DETA (Diethylene Triamine) Storage	None
Loading of Formaldehyde and UFC into Trucks	None
Loading of Methanol into Trucks	Vapor Balance
Weigh Tanks	None
Kettles	None
Resin Chill and Resin Product Storage	None
Loading Resin Into Trucks	None
Fugitives from Material Handling	None
Truck Washing	None
Storage and Loading of Rosin Sizing	None
Boiler	None
Stand-By Generator	None
Cooling Towers	None
Resi-Mix Mixing Blending Baghouse	Bagfilter

Emissions Unit*	Pollution Control Device/Practice
Urea Silo and Handling	Bagfilter
Urea Storage Weigh Hopper	Bagfilter

**\* NOTE: All raw material and product storage tanks have secondary containment.**

A list of Non-Emitting Units is provided in the attachment to the Review Report.

Synthetic Minor Limitations

3. In accordance with the requirements of LRAPA 34-120, the permittee shall not exceed the production and material usage limits listed below. The limitations are necessary to comply with the PSEL and avoid Title V applicability. [LRAPA 34-120]
- a. Total resin production at the facility shall not exceed 618 million pounds per year\*\*.
  - b. UF (urea-formaldehyde) Resin production shall not exceed 200 million pounds per year\*\*.
  - c. Methanol Solvated P/F (phenol/formaldehyde) resin production shall not exceed 14 million pounds per year\*\*.
  - d. Other PF resin production shall not exceed 150 million pounds per year\*\*.
  - e. Polyamide resin production shall not exceed 254 million pounds per year\*\*.
  - f. No. 2 Fuel oil usage shall not exceed 1,242,560 gallons of diesel fuel per year\*\*.
  - g. Back-up Generator hours of operation shall not exceed 2000 hours per year\*.
  - h. Tanker truck loading of formaldehyde, UFC, and Methanol shall not exceed 840,000, 420,000, and 2 million gallons per year\*\* respectively.
  - i. Truck or railcar loading of UF, PF, and Polyamide resin shall not exceed 19,454,545, 21,400,000, and 70,887,131 gallons per year\*\* respectively.

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\*\*Year = Each 12-month rolling period

4. The permittee shall monitor compliance with the synthetic minor limits

by keeping the records required by Condition 17 and calculating a new 12-month total for each Hazardous Air Pollutant (HAP) and combination of HAPs as specified in Condition 17 by the 10th working day of each month. The 12-month rolling totals shall be determined by adding monthly production for the previous 12-month period.

Performance Standards and Emission Limits

5. The permittee shall not allow the emissions of particulate matter from the boiler in excess of 0.1 grains per standard cubic foot (gr/scf) of exhaust gas, adjusted to 50 percent excess air or calculated to 12% CO<sub>2</sub> (carbon dioxide). [LRAPA 32-030]
6. Particulate emissions from any single air contaminant emissions source, installed, constructed or modified after June 1, 1970, except for the boiler, shall not exceed 0.1 grains per dry standard cubic foot. [LRAPA 32-015(2)]
7. Visible emissions from any emission point shall not equal or exceed 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour, excluding uncombined water. [LRAPA 32-010(1B)&(3)]
8. The permittee shall not use any distillate oil containing more than 0.5 percent sulfur by weight. [LRAPA 32-065(2)(B)]

Plant Site Emission Limits (PSELs)

9. Total emissions from all sources located on the plant site shall not exceed the hourly, monthly and annual limits listed below. This is calculated on base production rates and process emissions indicated in the review report.

**ANNUAL PSEL**  
 (tons per year)

Source	PM/ PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb
Storage and Weigh Tanks and Resin Chill and Product Storage Tanks	NA	NA	NA	4.1	NA	NA
Loading of Formaldehyde /UFC to Truck	NA	NA	NA	0.13	NA	NA
Loading of Methanol to Trucks	NA	NA	NA	0.06	NA	NA
Kettles	NA	NA	NA	10.5	NA	NA
Loading Resin into Trucks	NA	NA	NA	2.9	NA	NA
Fugitives from Material Handling	NA	NA	NA	2.8	NA	NA
Truck Washing	NA	NA	NA	0.7	NA	NA
Storage and loading of Rosin Sizing	NA	NA	NA	0.13	NA	NA
Boiler	2.6	44.2	38.0	1.1	18.5	8x10 <sup>-3</sup>
Stand-By Generator	0.2	0.2	3.1	0.3	0.1	NA
Cooling Tower	1.7	NA	NA	NA	NA	NA
Urea Silo Baghouse	0.3	NA	NA	NA	NA	NA
Urea Loading Hopper Baghouse	0.3	NA	NA	NA	NA	NA
Resi-Mix Blending Baghouse	NA	NA	NA	NA	NA	NA
<b>Totals</b>	<b>5.1</b>	<b>44.4</b>	<b>41.1</b>	<b>22.7</b>	<b>18.6</b>	<b>8x10<sup>-3</sup></b>

**MONTHLY PSEL**  
 (pounds per month)

Source	PM/ PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb
Storage and Weigh Tanks and Resin Chill and Product Storage Tanks	NA	NA	NA	812.7	NA	NA
Loading of Formaldehyde and UFC to Truck	NA	NA	NA	26.0	NA	NA
Loading of Methanol to Trucks	NA	NA	NA	12.0	NA	NA
Resin Kettles	NA	NA	NA	2101.5	NA	NA
Loading Resin into Trucks	NA	NA	NA	580.0	NA	NA
Fugitives from Material Handling	NA	NA	NA	560.0	NA	NA
Truck Washing	NA	NA	NA	140.0	NA	NA
Storage and loading of Resin Sizing	NA	NA	NA	26.0	NA	NA
<b>Totals</b>	<b>NA</b>	<b>NA</b>	<b>NA</b>	<b>4258.2</b>	<b>NA</b>	<b>NA</b>

**HOURLY PSEL**  
 (pounds per hour)

Source	PM/ PM <sub>10</sub>	SO <sub>2</sub>	NO <sub>x</sub>	VOC	CO	Pb
Boiler	1.3	31.3	17.4	0.4	7.4	5x10 <sup>-4</sup>
Stand-By Generator	0.2	0.2	3.1	0.3	0.7	--
Cooling Tower	0.1	--	--	--	--	--
Urea Silo Baghouse	0.1	--	--	--	--	--
Urea Loading Hopper Baghouse	0.4	--	--	--	--	--
Resi-Mix Blending Baghouse	--	--	--	--	--	--
<b>Totals</b>	<b>2.1</b>	<b>31.5</b>	<b>20.5</b>	<b>0.7</b>	<b>8.1</b>	<b>5x10<sup>-4</sup></b>

Under normal operating conditions and excluding excess emissions from incidents occurring under LRAPA Title 36, emissions of any individual

HAP listed in OAR 340-244-0040 shall not exceed 9.9 tons per each 12-month rolling period; combined emissions of all HAPs listed in OAR 340-244-0040 shall not exceed 24.5 tons per each 12-month rolling period.

In addition to information provided in the review report, PSEs are based on the following maximum operating capacities and limits on annual productions and material uses.

Maximum total resin production is limited to 618 million pounds of resin per each 12-month rolling period to ensure compliance with Synthetic Minor status for HAPs.

Maximum capacity of the boiler on natural gas or diesel oil equals 61.67 MMBTU per hour heat input or 5.4 E+11 BTU per year (based on 8760 hours per year). In addition the backup diesel generator (0.7 MMBTU per hour) is limited to 2000 hours of operation per year. Maximum usage of diesel fuel is limited to 1,242,560 gallons of diesel per 12-month rolling period to avoid exceeding emissions of 100 tons CO per year emission that would trigger Title V applicability and to avoid NSR/PSD applicability (emission increases over baseline >SER, see LRAPA Title 38).

Maximum production of UF resin is limited to 200 million pounds per 12-month rolling period to comply with the Synthetic Minor limits for individual HAPs.

Maximum production of Methanol Solvated P/F resin is limited to 14 million pounds per 12-month rolling period to comply with the Synthetic Minor limits for individual HAPs, specifically for methanol.

Maximum production of Other PF resin (produced without methanol) is limited to 150 million pounds per 12 month rolling period to comply with the Synthetic Minor limits for individual HAPs.

Maximum production of Polyamide is limited to 254 million pounds per 12-month rolling period to comply with the Synthetic Minor limits for individual HAPs.

Maximum tanker truck loading of formaldehyde is limited to 840,000 gallons per 12-month rolling period. Maximum tanker truck loading of UFC is limited to 420,000 gallons per 12-month rolling period. Maximum tanker truck loading of Methanol is limited to 2 million gallons per 12-month rolling period. The tanker truck loading limits are to ensure compliance with the Synthetic Minor limits for individual HAPs.

Maximum truck or railcar loading of UF resin is limited to 19,454,545 gallons per 12-month rolling period. Maximum truck or railcar loading of PF resin is limited to 21,400,000 gallons per 12-month rolling period.

Maximum truck or railcar loading of Polyamide resin is limited to 70,887,131 gallons per 12-month rolling period. The truck or railcar resin-loading limits are to ensure compliance with the Synthetic Minor limits for individual HAPs.

VOC PSEL calculations are based on operation of the vapor return system for the loading of methanol and epichlorohydrin. The vapor return control system is estimated to be 98% efficient in controlling working losses from methanol loading/transfer.

Any changes in operation that may increase emissions must be approved by LRAPA. Failure to do so may result in enforcement actions being taken by LRAPA.

#### Special Conditions

10. If the permittee anticipates that future emission levels of criteria pollutants or HAPs, excluding emissions which occur during excess emission incidents allowed under LRAPA Title 36, will exceed the trigger levels for the Title V Federal Operating Permit Program (Title V), the permittee shall follow the procedures outlined in LRAPA 34-120 (5) or (6) to apply for a Federal Operating Permit.

#### Operating & Maintenance Requirements (O&M)

11. The permittee shall submit and follow an LRAPA-approved Inspection and Maintenance (I&M) plan and schedule. [LRAPA 48-015(2) and LRAPA 32-007]

#### Monitoring & Recordkeeping

12. The permittee shall record the following parameters. A record of all such data shall be maintained for a period of two years at the plant site and shall be available for inspection by authorized representatives of LRAPA. [LRAPA 34-070(5)]
  - a. All operating and production parameters to be reported to LRAPA annually as required in Condition 17.
  - b. Records of excess emission events as defined in LRAPA Title 36 (recorded on occurrence) and required by General Condition G15.

#### NSPS Subpart Kb Requirements

13. For the life of the tank, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the following existing tanks: 301, I-3, I-4, I-5, I-6, RM3, RM4, RM5, RM6, 505, 506, 508, 602,

- 604, 701, 704, 705, 800, 801, 802, and 900. [40 CFR 60.116b(a) and (b)]
14. For the life of the tank, the permittee shall keep readily accessible records showing the dimension of the storage vessel and an analysis showing the capacity of the storage vessel for the following tanks to be installed during the life of the permit: 100, 101, 102, 103, 104, 105, and 706. [40 CFR 60.116b(a) and (b)]
  15. The permittee shall notify LRAPA within 30 days when the liquid service of the tanks listed in Conditions 13 and 14 above changes. [40 CFR 60.116b(c)]
  16. None of the storage tanks at the facility are subject to NSPS Subpart Kb emission standards or testing requirements.

Recordkeeping and Reporting Requirements

17. An annual report to document compliance with the Synthetic Minor limits and PSEs shall be submitted to LRAPA by February 15th each year. The annual reporting period is January 1st thru December 31<sup>st</sup>.

The permittee shall also keep monthly records of the following parameters. [LRAPA 34-120]:

**a. Operating and Production Parameters**

*(all totals shall be 12-month rolling totals)*

- i. Total pounds of resin production.
- ii. Total pounds of Methanol Solvated P/F resin production (including PF resin produced with methanol).
- iii. Total pounds of "Other" PF resin production.
- iv. Total pounds of UF resin production.
- v. Total pounds of Polyamide Resin produced.
- vi. Type and amount of No. 2 oil burned in Boiler.
- vii. Hours of Operation for the Emergency Generator.
- viii. Total gallons/year of Methanol loaded into tanker trucks.
- ix. Total gallons/year of UF, PF, and Polyamide resin loaded into truck or railcar.
- x. Methanol storage tank vapor return system downtimes, cause of such downtimes, and corrective actions taken.

**b. Facility Emissions ( $E_{\text{facility}}$ )**

Pollutant monthly totals for formaldehyde (HCHO), methanol (CH<sub>3</sub>OH), phenol (C<sub>6</sub>H<sub>6</sub>O) and total VOC emissions for normal operations calculated using the following equations (all monthly totals shall be added to the monthly totals from the previous 11 months to obtain a 12-month rolling total):

i. **Kettle Emissions ( $E_{kettle}$ )** from resin manufacturing:

$$E_{kettle} = \sum R_i \times EF_i$$

Where  $R_i$  = total tons of each resin produced as reported per Condition 17.a and  $EF_i$  = emission factor in pounds per ton of resin produced for each HAP<sub>i</sub> (Formaldehyde (HCHO), methanol (CH<sub>3</sub>OH), phenol (C<sub>6</sub>H<sub>6</sub>O), and Epichlorohydrin (C<sub>3</sub>H<sub>5</sub>ClO) and total VOC).

Worst-case emission factors are as follows (all values are in pounds per ton).

Resin Type	Phenol	Methanol	Formaldehyde	Epichlorohydrin	VOC
UF	--	0.04	0.038	--	0.078
Methanol Solvated P/F Resin	0.001	1.05	0.024	--	1.08
Other PF	0.001	0.04	0.01	--	0.05
Polyamide	--	--	--	0.015	0.015

ii. **Tank Emissions ( $E_{tank}$ )** from each HAP and VOC-emitting Storage and Raw Material tank identified in the Attachment to the Review Report:

$$EF_{tank} = \sum \text{EPA's "TANKS" Program emission totals for each tank and each pollutant}$$

iii. **Truck or Railcar Loading of UF and Polyamide Resin Resin ( $E_{UF}$  and Polyamide truck) :**

$$E_{UF \text{ and Polyamide truck}} = \sum R_i \times EF_i$$

Where  $R_i$  = total gallons per 12-month rolling period of UF and Polyamide resin loaded into trucks as reported per Condition 17.a and  $EF_i$  = emission factor in pounds per 1000 gallons of material loaded for each HAP<sub>i</sub> (Epichlorohydrin, Formaldehyde (HCHO), and total VOC).

Worst-case emission factors are as follows (all values are in pounds per thousand gallons).

Material Type	Emission Factor (lbs/1000 gals)
Epichlorohydrin	0.053
Formaldehyde	0.007

Material Type	Emission Factor (lbs/1000 gals)
<b>Total VOC</b>	<b>0.06</b>

iv. **Truck or Railcar Loading of PF Resin ( $E_{PFtruck}$ ) :**

$$E_{PFtruck} = \sum R_i \times EF_i$$

Where  $R_i$  = total gallons per 12-month rolling period of PF resin loaded into trucks as reported per Condition 17.a and  $EF_i$  = emission factor in pounds per 1000 gallons of material loaded for each HAP<sub>i</sub> (Formaldehyde (HCHO), methanol (CH<sub>3</sub>OH), Phenol and total VOC).

Worst-case emission factors are as follows (all values are in pounds per thousand gallons).

Material Type	Emission Factor (lbs/1000 gals)
Methanol	1.11
Formaldehyde	0.013
Phenol	0.002
<b>Total VOC</b>	<b>1.13</b>

v. **Loading of Methanol, Formaldehyde, and UFC into Trucks ( $E_{truck}$ ) :**

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$$E_{truck} = \sum R_i \times EF_i$$

Where  $R_i$  = total gallons per 12-month rolling period of methanol, formaldehyde, and UFC loaded into trucks as reported per Condition 17.a and  $EF_i$  = emission factor in pounds per 1000 gallons of material loaded for each HAP<sub>i</sub> (Formaldehyde (HCHO), methanol (CH<sub>3</sub>OH), Formaldehyde as UFC(HCHO) and total VOC).

Worst-case emission factors are as follows (all values are in lbs per thousand gallons).

Material Type	Emission Factor (lbs/1000 gals)
Methanol	2.92

Material Type	Emission Factor (lbs/1000 gals)
Formaldehyde	0.27
UFC (Formaldehyde)	0.027
<b>Total VOC</b>	<b>3.217</b>

vi. **Facility Emissions** ( $E_{\text{facility}}$ ):

$E_{\text{facility}} = (\sum 17.b.i + 17.b.v) +$  the monthly values for each HAP and total VOCs in the table below. The values in the table below are based on the potential to emit and are not dependent upon throughputs. All monthly values below were calculated by taking the annual estimation for each pollutant and multiplying the total by 2,000 pounds per ton and dividing by 12 months per year. All values are in pounds.

Source	Methanol	Formaldehyde	Phenol	VOCs
Fugitives from Material Handling	153.3	116.6	61.7	466.6
Truck Washing	26.7	0.5	--	0.7
Storage and Truck Loading of Rosin Sizing	--	--	--	21.7
Boiler	--	--	--	188.3
<b>Total VOC</b>	<b>180.0</b>	<b>117.1</b>	<b>61.7</b>	<b>677.3</b>

- c. A log of all planned and unplanned excess emissions in accordance with General Condition G15.
- d. A record of all items required by the LRAPA approved I&M plan.
- e. Unless otherwise specified, all reports, test results, notifications, etc., required by the above terms and conditions shall be reported to the following office:

Lane Regional Air Pollution Authority  
 1010 Main Street  
 Springfield, Oregon 97477

(541) 736-1056

Fee Schedule

18. In accordance with adopted regulations, the permittee will be invoiced annually for the Compliance Determination Fee and for all applicable fees associated with Synthetic Minor status. [LRAPA 34-150]

Open Burning

19. The permittee is prohibited from conducting open burning on the plant site except as may be allowed by LRAPA 47-020. [LRAPA 47-015(5)]

MH/bp  
12/3/01

**GENERAL PERMIT CONDITIONS**

General Conditions and Disclaimers

- G1. A copy of the permit application and this Air Contaminant Discharge Permit (ACDP) must be available on site for inspection upon request.
- G2. The permittee shall allow the Director or his/her authorized representatives access to the plant site and pertinent records at all reasonable times for the purpose of making inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant discharge records and otherwise conducting necessary functions related to this permit in accordance with ORS 468.095. [LRAPA 13-020(1)(h)]
- G3. The issuance of this 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.

Performance Standards and Emission Limits

- G4. The permittee shall not cause or permit the emissions of any particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055]
- G5. The permittee shall not discharge from any source whatsoever such quantities of air contamination which cause injury, detriment, public nuisance or annoyance to any persons or to the public or which cause injury or damage to business or property; such determination to be made by the authority. [LRAPA 32-090(1)]
- G6. The permittee shall not cause or permit emission of water vapor if the water vapor causes or tends to cause detriment to the health, safety or welfare of any person or causes, or tends to cause damage to property or business. [LRAPA 32-090(2)]
- G7. The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emissions of air contaminants which would otherwise violate LRAPA rules. [LRAPA 33-030(1)]
- G8. The permittee shall not cause or permit the installation or use of any device or use of any means designed to mask the emissions of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 33-030(2)]

- G9. The permittee shall not allow any materials to be handled, transported, or stored; or a building, its appurtenances or road(s) to be used, constructed, altered, repaired, or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from being airborne. [LRAPA 48-015(2)]
- G10. The permittee shall not cause or permit the emissions of odorous matter in such a manner as to cause a public nuisance. [LRAPA 49-010(1)]

Excess Emissions: General Policy

- G11. Emissions of air contaminants in excess of applicable standards or permit conditions are considered unauthorized and are subject to enforcement action, pursuant to LRAPA 36-010 and 36-030. These rules apply to any permittee operating a source which emits air contaminants in violation of any applicable air quality rule or permit condition resulting from the breakdown of air pollution control equipment or operating equipment, process upset, startup, shutdown, or scheduled maintenance. [LRAPA 32-001(1)]

Excess Emissions: Notification and Record-keeping

- G12. The permittee must immediately (i.e., as soon as possible, but in no case more than one (1) hour after the beginning of the excess emissions period) notify LRAPA by telephone or in person of all cases of excess emissions due to upset or breakdown. [LRAPA 36-020(1)] Notification shall include:
- a) the source name;
  - b) the nature of the emissions problem;
  - c) the name of the person making the report;
  - d) the name and telephone number of the contact person for further information;
  - e) the date and time of the onset of the upset condition;
  - f) whether or not the incident was planned;
  - g) the equipment involved in the upset or breakdown;
  - h) the estimated type and quantity of excess emissions;
  - i) the estimated time of return to normal operations;
  - j) the efforts made to minimize emissions; and
  - k) a description of remedial actions to be taken.

Notification shall be made to the LRAPA office. The current LRAPA telephone number during regular business hours (8 a.m. - 5 p.m., M-F) is (541) 736-1056. During nonbusiness hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the LRAPA Upset/Complaint Line. The current number is (541) 726-1930.

Follow-up reporting, if required by LRAPA, shall contain all information required by Condition G15.

- G13. At each reporting period specified in this permit, or sooner if required by the Authority, the permittee shall submit a copy of the upset log entries for the reporting period, as required by Condition G15. [LRAPA 36-025(4)]
- G14. Any excess emissions which could endanger public health or safety shall immediately be reported to the Oregon Emergency Response System (OERS) at 1-800-452-0311.
- G15. The permittee shall keep an upset log of all planned and unplanned excess emissions. [LRAPA 36-025(3) and 36-030(1)] The upset log shall include the following:
- a) the date and time each event was reported to the Authority;
  - b) whether the process handling equipment and the air pollution control equipment were at all times maintained and operated in a manner consistent with good practice for minimizing emissions;
  - c) whether repairs or corrections were made in an expeditious manner when the permittee knew or should have known that emission limits were being or were likely to be exceeded;
  - d) whether the event was one in a recurring pattern of incidents which indicate inadequate design, operation, or maintenance; and
  - e) the final resolution of the cause of the excess emissions.

Upset logs shall be kept by the permittee for two (2) calendar years. [LRAPA 36-025(4)]

Excess Emissions: Scheduled Maintenance

- G16. Where it is anticipated that shutdown, by-pass, or operation at reduced efficiency of production equipment or air pollution control equipment for necessary scheduled maintenance may result in excess emissions, the permittee must obtain prior Authority approval of procedures that will be used to minimize excess emissions. Application for approval of procedures associated with the scheduled maintenance shall be submitted and received by the Authority in writing at least seventy-two (72) hours prior to the event. [LRAPA 36-015(1)] The application shall include the following:
- a) the reasons explaining the need for maintenance, including why it would be impractical to shut down the source operation during the period, and why the by-pass or reduced efficiency could not be avoided through better scheduling for maintenance or through better operation and maintenance practices;
  - b) identification of the specific production or emission control equipment or system to be maintained;
  - c) the nature of the air contaminants likely to be emitted during

the maintenance period, and the estimated amount and duration of the excess emissions, including measures such as the use of overtime labor and contract services and equipment that will be taken to minimize the length of the maintenance period; and

- d) identification of specific procedures to be followed which will minimize excess emissions.

G17. No scheduled maintenance which is likely to result in excess emissions shall occur during any period in which an Air Pollution Alert, Air Pollution Warning, or Air Pollution Emergency has been declared, or during an announced "Stage I Red" woodstove advisory period, in areas determined by the Authority as PM<sub>10</sub> Nonattainment Areas. [LRAPA 36-015(4)]

G18. In cases where the Authority has not received notification of scheduled maintenance that is likely to cause excess emissions within the required seventy-two (72) hours prior to the event, or where such approval has not been waived pursuant to LRAPA 36-025(2), the permittee shall immediately notify the Authority by telephone of the situation, and shall be subject to the requirements of Conditions G12 and G13. [LRAPA 36-015(5)]

#### Air Pollution Emergencies

G19. The permittee shall, upon declaration of an air pollution episode, take all actions specified in Tables 1, 2, and 3 of LRAPA's Title 51 (see Attachment A) and shall particularly put into effect the Authority-approved preplanned abatement strategy for such condition, if applicable. [LRAPA 51-015]

#### Notification of Construction/Modification

G20. The permittee shall notify LRAPA in writing and obtain approval in accordance with LRAPA 34-035 before:

- a) constructing or installing any new source of air contaminant emissions, including air pollution control equipment; or
- b) modifying or altering an existing source that may significantly affect the emissions of air contaminants, or
- c) making any physical change which increases emissions; or
- d) changing the method of operation, the process, or the fuel use, or increasing the normal hours of operation to levels above those contained in the permit application and reflected in this permit and which result in increased emissions.

#### Notification of Name Change

G21. The permittee shall notify LRAPA in writing, using an LRAPA Application for Administrative Amendment to ACDP form, within 60 days after legal change of the registered name of the company with the Corporation

Division of the State of Oregon.

Applicable administrative fees must be submitted with an application for the name change.

Permit Renewal

- G22. Application for renewal of this permit must be submitted not less than 60 days prior to the permit expiration date. A Filing Fee, an Application Processing Fee, and an Annual Compliance Determination Fee must be submitted with the application for the permit renewal. [LRAPA 34-035]
- G23. The procedure for issuance of a permit shall apply to renewal of a permit. If a completed application for a renewal of a permit is filed with the Authority in a timely manner, prior to the expiration date of the permit, the permit shall not be deemed to expire until final action has been taken on the renewal application to issue or deny a permit. [LRAPA 34-130(16)]

Termination Conditions

- G24. This permit shall be automatically terminated: [LRAPA 34-140(2)]
- a) within sixty (60) days after sale or exchange of the activity or facility which requires a permit;
  - b) upon change of nature of the activities, operations, emissions, or discharges from those of record in the last application;
  - c) within one (1) year after a plant closure lasting continuously for one (1) or more years;
  - d) upon issuance of a new, renewal, or modified permit for the same operation; or
  - e) upon written request of the permittee.
- G25. In the event that it becomes necessary to suspend or terminate this permit due to non-compliance with the terms of the permit, unapproved changes in operation, false information submitted in the application or any other cause, the Authority shall notify the permittee by registered or certified mail of its intent to suspend or revoke the permit. Such notification shall include the reasons for the suspension or revocation. The suspension or revocation shall become effective twenty (20) days from the date of mailing of such notices unless, within that time, the permittee requests a hearing. Such a request for hearing shall be made in writing and shall state the grounds for such a request. [LRAPA 34-140(3)]
- G26. Termination of this permit resulting from continuous plant closure shall subject the source to review as a new non-permitted source upon application to operate the facility. [LRAPA 34-140(4)]

G27. If the Authority finds that there is a serious danger to the public health or safety or that irreparable damage to a resource will occur, it may suspend or terminate this permit, effective immediately. Notice of such suspension or termination must state the reasons for such action and advise that the permittee may request a hearing. Such a request for a hearing shall be made in writing within ninety (90) days of the date of the suspension and shall state the grounds for the request. [LRAPA 34-140 (5)]

G28. Any hearing requested shall be conducted pursuant to the rules of the Authority. [LRAPA 34-140(6)]

G29. The permittee shall submit, by April 20 of each year, the emission inventory form provided by the Authority.

DW/bp [revised 10/24/01]