

LANE REGIONAL AIR POLLUTION AUTHORITY

1010 Main Street
Springfield, Oregon 97477
(503) 736-1056

SYNTHETIC MINOR
AIR CONTAMINANT DISCHARGE PERMIT (SM-ACDP)

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

Issued To:

University of Oregon
Department of Physical Plant
1295 Franklin Boulevard
Eugene, Oregon 97403

Land Use Compatibility Statement:

From: City of Eugene
Dated: May 20, 1997

Mailing Address:

1230 University of Oregon
Eugene, Oregon 97403-5224

Fee Basis:

Fuel-burning Equipment, Table A,
Part II, 58b
Electric Power Generation or
Cogeneration, Table A,
Part II, 55c

Permit Number: 208557

Permit Type: Synthetic Minor

SIC: 4961 Fuel-burning Equipment
4911 Electric Power Generation

Date Issued: April 7, 2000

Expiration Date: April 6, 2005

Modified:

- Changed to allow regular power generation, June 29, 2001

Permitted Sources:

Boiler #1: 79 MMBtu/hr, Gas-fired
(NSPS Subpart Dc Boiler)

Boiler #4: 140 MMBtu/hr, Gas-fired
Two 750 KW Oil-fired Generators
Casanova Boiler
Agate Hall Boilers
Practice Facility Heaters
Aggregate Insignificant Activities

Issued

By: _____
Brian L. Jennison, Ph.D., Director

Date: _____

Permitted Activities

1. Until this permit expires or is revoked, the permittee may discharge air contaminants from its operation in accordance with the requirements,

limitations, and conditions of 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).

Synthetic Minor Limits

2. This source will continue to be classified as a synthetic minor while the potential to emit is limited to less than:

100 tons per year of any criteria pollutant.

Any violation of any term that limits the potential to emit will be a violation of LRAPA 34-170 (OAR 340-28-2110), and the source will need to apply for a Federal Operating Permit.

3. By the tenth day of each month, the permittee shall record the total monthly fuel usage and the rolling 12-month total fuel usage for Boilers 1 and 4, and for Generators A and B. Whenever the rolling 12-month total of fuel usage exceeds:

- ◆ 109,000 gallons of #2 oil for the generators (Generators A and B combined), or
- ◆ 680 MMCF for the boilers (Boilers 1 and 4 combined), or
- ◆ 391,000 gallons of #2 oil for the boilers (Boilers 1 and 4 combined),

the permittee shall also calculate and record emissions to demonstrate compliance with the PSELs for sulfur dioxide (SO₂), nitrogen oxides (NO_x), and carbon monoxide (CO).

Performance Standards and Emission Limits

4. Plant Site Emission Limits

**Annual Plant Site Emission Limits (PSEL)
(Tons per year)**

PM	PM10	SO2	CO	VOC	NOx
79.8	24.6	72.7	36.2	4.42	72.0

Any changes in operation that may increase the emissions or the PSEL must be approved by LRAPA.

5. Visible emissions shall not equal or exceed 20% opacity for a period or periods aggregating more than 3 minutes in any 1 hour. [LRAPA 32-010]
6. Emissions of particulate matter shall not exceed 0.1 grains per cubic foot of exhaust gas, adjusted to 50 percent excess air or calculated to 12 percent carbon dioxide. [LRAPA 32-030]

7. The sulfur content of any fuel oil burned shall not exceed 0.5% by weight. [LRAPA 32-065]
8. The permittee shall operate all air contaminant generating processes so that fugitive-type dust associated with the operation will be adequately controlled at all times.
9. Emissions of any particulate matter which is greater than 250 micrometers in diameter shall not be permitted if such particulate matter does or will deposit upon the real property of another person.

New Source Performance Standards

10. The operation of Boiler #1 shall comply with the New Source Performance Standards for Small Industrial-Commercial-Industrial Steam Generating Units (40 CFR Part 60 Subpart Dc). This requires, but is not limited to, complying with sulfur content limits for fuel oil, record keeping of fuel usage, and annual reporting. [LRAPA 46-554]

Performance Testing

11. Within 3 years of the issuance of this permit, the permittee shall perform source testing to verify emission factors used to demonstrate compliance and with NOx and SO2 emissions from Boilers #1 and #4. The boilers shall be tested for NOx while operating on natural gas. The boilers shall be tested for NOx and SO2 while operating on oil.

The permittee shall conduct all testing in accordance with the most recent version of the Oregon Department of Environmental Quality's Source Sampling Manual.

Each test shall consist of a minimum of three (3) individual test runs and the emission results shall be reported as the arithmetic average of all valid test runs. At least two (2) valid test runs are required for a source test to be accepted.

Source tests shall be performed at 90% to 110% of the normal maximum operating rate of the emission source. The normal maximum operating rate is defined as the 90th percentile of the average hourly steam operating rates during the 12-month period immediately preceding the source test. If 12 months of average hourly steam production rate is not readily available, Boiler Nos. 1 and 4 shall be tested between 90 and 100% of 60,000 Klb/hr steam and 100,000 Klb/hr steam, respectively.

During each test run, the permittee shall record the following information:

- a) Type of fuel being burned;
- b) Amount of fuel burned;
- c) Amount of steam produced; and
- d) For fuel oil test, percent weight sulfur.

The permittee shall notify LRAPA at least 15 days prior to conducting testing. The permittee shall submit a source test protocol to be approved by LRAPA. The protocol shall be in accordance with the ODEQ Source Sampling Manual, and shall be approved by LRAPA prior to testing. The test protocol shall be submitted to:

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

A report summarizing the results of the performance testing shall be submitted no later than thirty (30) days after the testing is completed.

Monitoring and Reporting

12. The permittee shall keep an upset log of all planned and unplanned excess emissions. The upset log shall include: [LRAPA 36-025]
 - a. The time and date of each event;
 - b. Information demonstrating that the period of excess emissions was unavoidable, and;
 - c. The final resolution of the cause of the excess emissions.
13. Upset conditions or breakdown of equipment or air pollution control equipment which may result in exceeding the emission limitations specified in this permit must be reported to LRAPA in accordance with Section 36-020 of LRAPA's rules.
14. The following information for Boilers 1 and 4, and Generators A and B, shall be recorded within the frequency prescribed. Records shall be maintained for a period of at least 2 years and made available for LRAPA inspection upon request. In addition, the permittee shall submit a copy of the records required in 14.d. and 14.g. to LRAPA by February 15th of each year.

<u>Parameter</u>	<u>Recording Frequency</u>
a. Record of maintenance activities	Per occurrence
b. Natural gas usage (cubic feet)	Daily
c. Fuel oil usage (gallons)	Daily (Monthly for Generators)
d. 12-month total fuel usage	Monthly
e. Certification of sulfur content of fuel (percent)	Per delivery

- | | |
|----------------------------|------------|
| f. Steam production (Klbs) | Continuous |
| g. Emissions calculations* | Monthly |

* As specified in Condition 3.

15. In accordance with 40 CFR 60.48(c), the permittee shall submit quarterly reports of the use of No.2 oil for quarters when No.2 oil is used. The quarterly reports shall be postmarked by the 30th day following the end of the reporting period, and include the following information:
- a. The name of the oil supplier; and
 - b. A statement from the oil supplier that the oil complies with the specification for fuel oil numbers 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78, "Standard Specification for Fuel Oils."
 - c. In addition to records of fuel supplier certifications, the quarterly reports shall include a certified statement signed by the permittee of the affected facility that the records of fuel supplier certifications submitted represent all of the fuel combusted during the quarter.

DJ
6/28/01

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 50-020]

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) 726-2514. 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 PM₁₀ 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 "Annual Information Update 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)]

DW/bp [revised 9/10/99]