

**LANE REGIONAL AIR POLLUTION AUTHORITY
TITLE V OPERATING PERMIT REVIEW REPORT**

Lane Regional Air Pollution Authority
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Springfield, Oregon 97477

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LIST OF ABBREVIATIONS USED

ACDP	Air Contaminant Discharge Permit	MM	1,000,000
Act	Federal Clean Air Act	MB	Material Balance
ASTM	American Society of Testing and Materials	MBF	1,000 Board feet
BDT	Bone dry ton	MSF	1,000 Square feet 3/8" basis
BDU	Bone dry unit	MSDS	Material Safety Data Sheets
BF	Board feet	MAT-S	Material handling –Sawmill
Btu	British thermal unit	MAT-V	Material Handling-Veneer
CFR	Code of Federal Regulations	NA	Not applicable
CO	Carbon Monoxide	NO _x	Nitrogen oxides
CPMS	Continuous parameter monitoring system	O ₂	Oxygen
DEQ	Department of Environmental Quality	OAR	Oregon Administrative Rules
dscf	Dry standard cubic feet	ODEQ	Oregon Department of Environmental Quality
EF	Emission factor	ORS	Oregon Revised Statutes
EPA	US Environmental Protection Agency	O&M	Operation and maintenance
EU	Emissions Unit	Pb	Lead
FCAA	Federal Clean Air Act	PCD	Pollution Control Device
FSA	Fuel sampling and analysis	PM	Particulate matter
gr/dscf	Grain per dry standard cubic foot (1 pound = 7000 grains)	PM ₁₀	Particulate matter less than 10 microns in size
HAP	Hazardous Air Pollutant as defined by OAR 244-0040	ppmv	Parts per million by volume
HCFC	Halogenated Chloro-Fluoro-Carbons	ppm	Parts per million
ID	Identification number	PSEL	Plant Site Emission Limit
I&M	Inspection and maintenance	psia	pounds per square inch, actual
LRAPA	Lane Regional Air Pollution Authority	SERP	Source emissions reduction plan
M	1,000	SO ₂	Sulfur dioxide
		ST	Source test
		VE	Visible emissions
		VMT	Vehicle miles traveled
		VOC	Volatile organic compounds

INTRODUCTION

1. This is an existing facility applying for a new Title V federal operating permit.

In accordance with OAR 340-028-2200(1)(f), this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION

2. Willamette Industries, Inc. owns and operates a veneer manufacturing and saw milling facility located on North Coburg Road in Eugene, Oregon.

FACILITY DESCRIPTION

3. The Coburg Mill includes several independent operations, including log sorting, sawmill, veneer drying, and some lumber surface treating. Logs brought to the facility, some of which are debarked already, are sorted by specie and grade in the log yard. Logs meeting the specifications for the sawmill are sent there. All other logs are shipped off site. The sawmill produces dimensional lumber for commercial sale. After cutting, the lumber is graded and labeled before shipping off site. Some of the lumber is surface treated with a chemical preservative. All steam used on site is supplied by a wood fired boiler firing hogged fuels (such as bark, wood trim, pitch from the veneer dryer pollution control device, and incidental volumes of oily rags, booms, absorbants, and debris. Green veneer is brought to the facility, dried in the veneer dryer, graded, and labled before shipment off site.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

4. The emissions units at this facility are the following:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Hogged fuel Boiler	Boiler	Wet ESP	Wet ESP
Veneer Dryer	Dryer	Wet Scrubber	Wet SC
Veneer Dryer Fugitives	Dryer Fugitives	None	NA
Roads-Paved	Roads-P	None	NA
Roads-Unpaved	Roads-U	None	NA
Sawmill Materials Handling (Mat-S1 Cutoff Saw & Barker; Mat-S2 Other Sawmill Fugitive Sources)	Mat-S1 & S2	None	NA

Veneer Materials Handling (Mat-V1 veneer mill Cyclone(s)& Bagfilter(s); Mat-V2 Veneer Mill Fugitive Sources)	Mat-V1 & V2	None	NA
VOC – Misc.	VOC	None	NA
Plant-1 - Annual PSEL includes: AI, Boiler, Dryer, MAT-S1, MAT-V1, Roads-P, Roads-U, VOC	Plant-1	See individual emission units	See individual emission units
Plant-2 - Daily PSEL includes: Boiler, Dryer	Plant-2	See individual emission units	See individual emission units
Plant-3 - Monthly PSEL includes: MAT-S1, MAT-V1, Roads-P, Roads-U, VOC	Plant-3	See individual emission units	See individual emission units
Plant-4 – Veneer Manufacturing Limit	Plant-4	See individual emission units	See individual emission units
Plant-5 – Process Weight Rule	Plant-5	See individual emission units	See individual emission units
Aggregate Insignificant: Mat-S2, Mat-V2, Storage Piles	AI	None	NA

5. Boiler burns hogged fuel to generate steam. The boiler is a stationary grate spreader stoker and manufactured by Kipper & Sons. The boiler was installed in 1973. No modification or reconstruction has been made to this boiler since the installation. The rated capacity of the boiler is 48 MM Btu/hr. The boiler is equipped with a wet ESP, which was manufactured by Geoenergy International Corp. and installed in 1990. The ranges for exhaust stack temperature and secondary voltage will be determined after the permit is issued.

Control equipment was required per Stipulated Final Order (SFO) number 90-01, and as a result of the SFO, the Wet ESP was installed to control PM emissions from the boiler. In order for the boiler to operate at 48,000 pounds of steam per hour, a grain loading limit of 0.03 gr/dscf for the boiler was agreed upon by LRAPA and Bohemia, Inc (the owner of the facility at that time). The limit went into effect as part of Bohemia's ACDP, issued April 1st, 1989

6. Veneer Dryer (Dryer): Moore veneer dryer 1, longitudinal deck with 6 decks and 2 zone. The dryer is steam heated and was installed in 1987 with maximum design capacity of 21,000 ft²/hr, 3/8" basis. The dryer is equipped with a Burley scrubber, with design inlet gas flow rate of 24,000 acfm.

7. Veneer Dryer Fugitives (Dryer Fugitives): This unit includes all fugitive emissions from the Dryer.

8. Paved road (Roads-P): Includes the vehicular traffic on paved roads around the plant that cause fugitive particulate matter emissions. The vehicles include automobiles, pickups, lift trucks tractors, log trucks, veneer trucks, and lumber trucks.

9. Unpaved road (Roads-U): Includes the vehicular traffic on unpaved roads around the plant that causes fugitive particulate matter emissions. The vehicles include lift trucks, log trucks, and tractors.

10. Sawmill material handling 1 (Mat-S1) includes the barker and cutoff saw.
11. Sawmill material handling 2 (Mat-S2) includes: chippers, shaker screen, hog fuel to boiler, sharp chain system, band saws, edgers, trim saws, baghouses, lumber sorter, and lumber stacker. All are included in the Aggregate Insignificant Emissions inventory.
12. Veneer material handling 1 (MAT-V1): includes chip cyclone and future bagfilters.
13. Veneer material handling 2 (Mat-V2): Veneer mill fugitives including the band saw, Chipper, Shaker Screen, Chip Bin, fines target box, fines bin. All are included in the Aggregate Insignificant Emissions Inventory.
14. VOC-Misc.: includes Enamels, Latex, End seal, wood surface treatment and thinner.
15. Plant-1 includes emissions units Boiler, Dryer, Mat-S1, Mat-V1, VOC-Misc., Piles, Roads-U, Roads-P, and AI for the purpose of the annual plant site emissions limit (PSEL).
16. Plant-2 includes emissions units Boiler and Dryer for the purposes of the daily short term PSEL.
17. Plant-3 includes emissions units Mat-S1, Mat-V1, VOC-Misc., Roads-U, and Roads-P for the purposes of the monthly short term PSEL.
18. Plant-4 veneer manufacturing emission limit.
19. Plant-5 process weight for emissions unit Mat-S1 and S2.
20. Aggregate Insignificant (AI): Aggregate Insignificant emissions include emissions from Mat-S2, Mat-V2, and hogged fuel Storage Piles.

Categorically Insignificant Activities: The facility has the following categorically insignificant activities:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under OAR Chapter 340, Divisions 20 through 32, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Service's Annual Report on Carcinogens when usage of the chemical mixture is less than 100,000 pounds/year
- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Food service activities
- Janitorial activities
- Personal care activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- Instrument calibration
- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
- Temporary construction activities

- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Air purification systems
- Demineralized water tanks
- Process raw water filtration systems
- Electrical charging stations
- Instrument air dryers and distribution
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Vacuum sheet stacker vents
- Log pond/sprinkling detention system
- Storm water settling basins
- Fire suppression and training
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils
- Health, safety, and emergency response activities
- Emergency generators and pumps used only during loss of primary equipment or utility service
- Non-contact steam vents and leaks and safety and relief valves for boiler steam distribution systems
- Non-contact steam condensate flash tanks
- Non-contact steam vents on condensate receivers, deaerators and similar equipment
- Boiler blowdown tanks
- Ash piles maintained in a wetted condition and associated handling systems and activities
- Oil/water separators in effluent treatment systems
- Sewage lagoons

Aggregate Insignificant Activities

21. Aggregate insignificant emissions from activities identified by the permittee are detailed in the following table:

Emissions Source	Pollutants (tons/yr)		
	PM	PM ₁₀	VOC
Sawmill Material Handling Mat-S	0.825	0.403	NA
Veneer Material Handling Mat-V2	0.021	0.009	NA
Hogged Fuel Piles	0.003	0.0015	0.28

Emissions Source	Pollutants (tons/yr)		
	PM	PM ₁₀	VOC
Totals	0.85	0.41	0.28

EMISSION LIMITS AND STANDARDS

22. ACDP CONDITIONS

The following conditions do not appear in the federal operating permit as they existed in the ACDP because of reasons given below:

ACDP 200524 Condition 1 (A)(1): Willamette Industries Inc. has requested that steam production be changed to daily and annual rates. Daily and annual steam production are a more precise indicator of compliance than hourly production and the number of hours per year.

The change has been approved for the reason given.

ACDP 200524 Conditions 1(A)(2): Willamette Industries Inc. has requested that veneer dryer production be changed to daily and annual production rates. These are a more precise indication of compliance than an hourly rate and the number of hours per year. This change has been approved for the reason given.

ACDP 200524 Condition 1(A)(3): Willamette Industries Inc. has requested the wording of this condition be changed to "produce 98,000 MSF/yr (3/8 inch basis) of veneer with no specific limits on the type of wood." Emissions from the dryer are based on the use of Douglas Fir, which has the highest VOC content of any species of wood dried at the facility.

This change has been approved for the reason given.

ACDP 200524 Condition 1(A)(4) and (5): Willamette Industries Inc. has requested that the limit for the Edger Target Box and the Lily Pad Chipper be removed because the equipment is no longer in operation and has been removed from the plant site

This change has been approved for the reason given.

ACDP 200524 Condition 1(A)(6): Willamette Industries Inc. has requested the veneer fines target box throughput be changed to daily and annual rates. These are more precise indications of compliance than an hourly rate and the number of hours per year.

This change has been approved for the reason given.

ACDP 200524 Condition 1(A)(7): Willamette Industries Inc. has requested the veneer chip cyclone throughput be changed to daily and annual rates. These are more precise indications of compliance than an hourly rate and the number of hours per year.

This change has been approved for the reason given.

ACDP 200524 Condition 1(B): Willamette Industries Inc. has requested PSELs be changed to reflect all devices at facility, revised production rates and updated emission factors.

This change has been approved for the reason given.

ACDP 200524 Condition 2: Willamette Industries Inc. has requested visible emission limitations changed to match current LRAPA regulations.

This change has been approved for the reason given.

ACDP 200524 Condition 3: Willamette Industries Inc. has requested visible emission limitations changed to match current LRAPA regulations.

This change has been approved for the reason given.

ACDP 200524 Condition 4: Willamette Industries Inc. has requested visible emission limitations changed to match current LRAPA regulations.

This change has been approved for the reason given.

ACDP 200524 Other Condition 1: Willamette Industries Inc. has requested general "Other Conditions" be removed in anticipation of general conditions to be established by LRAPA and/or DEQ for Title V operating permits.

This change has been approved for the reason given.

ACDP 200524 Other Condition 2: Willamette Industries Inc. has requested general "Other Conditions" be removed in anticipation of general conditions to be established by LRAPA and/or DEQ for Title V operating permits.

This change has been approved for the reason given.

ACDP 200524 Other Condition 4: Willamette Industries Inc. has requested general "Other Conditions" be removed in anticipation of general conditions to be established by LRAPA and/or DEQ for Title V operating permits.

This change has been approved for the reason given.

ACDP 200524 Other Condition 5: Willamette Industries Inc. has requested general "Other Conditions" be removed in anticipation of general conditions to be established by LRAPA and/or DEQ for Title V operating permits.

This change has been approved for the reason given.

ACDP 200524 Other Condition 6: Willamette Industries Inc. has requested general "Other Conditions" be removed in anticipation of general conditions to be established by LRAPA and/or DEQ for Title V operating permits.

This change has been approved for the reason given.

ACDP 200524 Monitoring & Reporting 1: Willamette Industries Inc. has requested general "Monitoring and Reporting" conditions be removed in anticipation of general monitoring requirements established by LRAPA and/or DEQ for Title V operating permits.

This change has been approved for the reason given.

ACDP 200524 Monitoring and Reporting 2(a): Willamette Industries Inc. has requested device compliance monitoring requirements and schedule be revised to meet Title V requirements.

The change has been approved for the reason given.

ACDP 200524 Monitoring and Reporting 2(b): Willamette Industries Inc. has requested device compliance monitoring requirements and schedule be revised to meet Title V requirements.

The change has been approved for the reason given.

ACDP 200524 Monitoring and Reporting 2(c): Willamette Industries Inc. has requested device compliance monitoring requirements and schedule be revised to meet Title V requirements.

The change has been approved for the reason given.

ACDP 200524 Monitoring and Reporting 2(d): Willamette Industries Inc. has requested device compliance monitoring requirements and schedule be revised to meet Title V requirements.

The change has been approved for the reason given.

ACDP 200524 Emission Reduction Plan: Willamette Industries Inc. has requested the emission reduction plan removed in anticipation of new emission reduction plan language established by LRAPA for Title V operating permits.

The change has been approved for the reason given.

ACDP 200524 Other 1: Willamette Industries Inc. has requested compliance determination fees be replaced by title V permit fees.

The change has been approved for the reason given.

ACDP 200524 Other 2: Willamette Industries Inc. has requested the ACDP be replaced by the Title V permit.

The change has been approved for the reason given.

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION

BASELINE EMISSION RATE INFORMATION

23. Baseline Operating Schedule for 1978

Facility: 24 hours/day x 5 days/week x 50 week/year =6,000 hrs/yr

The baseline production rates were as follows:

Production Or Process Parameter	Rate	Units
Lumber Production	68,465,760	BF/yr

24. Baseline emissions rates (tons/yr):

Emission Device/ Process	PM	PM ₁₀	CO	NO _x	SO ₂	VOC	Pb
Boiler	18.75	9.37	66.93	7.46	0.36	1.09	0.0016
Edger Target Box	0.44	0.22	NA	NA	NA	NA	NA
Lily Pad Chipper Target Box	0.11	0.06	NA	NA	NA	NA	NA
Paved Roads	211.69	41.3	NA	NA	NA	NA	NA
Unpaved Roads	7.70	2.77	NA	NA	NA	NA	NA
Piles	0.006	0.003	NA	NA	NA	0.12	NA
Material Handling	3.11	1.56	NA	NA	NA	NA	NA
Bark Extraction plant	5.59	5.23	NA	NA	NA	175.34	NA
Paints	NA	NA	NA	NA	NA	4.24	NA
Totals	247.4	60.51	66.93	7.46	0.36	180.79	0.0016

CURRENT PLANT SITE EMISSION LIMITS

25. The plant can be operated as much as 24 hours per day, 7 days per week, and 52 weeks per year.

26. The production rates used for determining the current PSELs are more than the baseline production and are as follows:

Production Or Process Parameter	Period	Rate	Units
Veneer Dried	Annual	98	MM SF/year (3/8" basis)
	Maximum Daily	500	MSF/day (3/8" basis)
Saw Mill	Annual	250	MMBF /year
	Maximum Daily	1,300	MBF /day

PLANT SITE EMISSION LIMITS

27. Components of the PSEL

Pollutant	Netting Baseline (ton/yr)	Components of the PSEL		
		Assigned	Unassigned	Credits
		(tons/yr)	(tons/yr)	(tons/yr)
PM	247.4	159.6	87.8	0
PM ₁₀	60.51	63.6	0	0
CO	66.9	160.4	0	0
NO _x	7.5	17.5	0	0
SO ₂	0.4	0.9	0	0
VOC	180.8	44.2	136.6	0
Pb	0.0016	0.00019	0.00141	0

For the assigned PSEL, the total annual tons per year are required to be determined as a rolling 12-month total.

28. The short-term PSEL for Plant 2 (daily) and Plant 3 (monthly) are shown below:

Emissions Unit ID Number	Pollutant	Short-Term PSEL	Units

Emissions Unit ID Number	Pollutant	Short-Term PSEL	Units
Plant-2: daily* PSEL includes Boiler, and Dryer	PM	338.4	lb/day
	PM ₁₀	338.4	lb/day
	CO	2534.4	lb/day
	NO _x	276.5	lb/day
	SO ₂	13.8	lb/day
	Pb	0.003	lb/day
	VOC	419.8	lb/day
Plant-3: monthly* PSEL includes; Roads-U, Roads-P, Mat-S1, Mat-V1, and VOC-Misc.	PM	27,860	lb/month
	PM ₁₀	6,961	lb/month
	VOC	1195.7	lb/month

*daily means a repeating 24-hour operating period, and monthly means calendar month.

The permit also contains requirements for the veneer manufacturing (Plant 4) and the process weight rule (Plant 5). The veneer manufacturing rule limits the facility to 1 lb of PM per 1000 square feet of veneer processed on a 3/8 inch basis. The emission unit Mat-S is required to meet the process weight rule (Plant 5) specifications as required by Table 1 in LRAPA 32-045.

SIGNIFICANT EMISSION RATE

29. The Plant Site Emission Limit increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 38 rules for all of the pollutants as shown below.

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Increase from baseline (tons/year)	SER (tons/year)
PM	247.4	247.4	0	25
PM ₁₀	60.51	63.6	+3.1	15
CO	66.9	160.4	+93.5	100
NO _x	7.5	17.5	+10.0	40
VOC	180.8	180.8	0	40

SO _x	0.4	0.9	+0.5	40
Pb	0.0016	0.00019	0.00141	0.6

HAZARDOUS AIR POLLUTANTS

30. The projected HAP emissions from the source are shown in the table below. These emissions are calculated on the basis of proposed operation parameters and must be recalculated by the permittee if production increases.

Hazardous Air Pollutants	Potential Emissions (tons/yr)
Acetaldehyde	1.55
Acrolein	0.002
Arsenic	0.001
Benzene	0.15
Biphenyl	0.00008
Cadmium	0.0003
Chromium	0.002
Ethanediol-1,2	0.04
Ethyl Benzene	0.005
Formaldehyde	1.60
Lead	0.0002
Manganese	0.18
Mercury	0.0001
Methanol	2.62
Methylene chloride	1.12
Naphthalene	0.05
Nickel	0.008
Phenol	0.26
Polycyclic Organic Matter	0.008
Propionaldehyde	0.22
Selenium	0.0007
TCDB-p-dioxin	5.10E-10
Toluene	0.12
Xylene	0.34
Total (Tons Per Year)p	8.26

The table above shows that the source emits less than 10 tons per year of any single HAP and less than 25 tons per year for any combination of HAPs, and is therefore not a major source for HAPs. Currently, there is no MACT standard that applies to this facility. If the source becomes subject to a MACT, a permit modification would be required.

STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

31. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended, Sections 601-618, do not apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances

must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

VENEER MANUFACTURING LIMIT (VML)

32. The permit includes requirements for complying with the board product rule in LRAPA 33-060(3)(B). The rule states that the facility must not emit more than one (1.0) pound of PM per 1000 SF of veneer produced on a 3/8-inch basis from the sources in Mat-V1 and Mat-V2. The maximum 8-hour production capacity of the plant computed on an hourly basis is 21 M SF per hour (3/8 inch basis).

To illustrate that the facility is assured compliance with the VML if in compliance with the PSEL, several equations are presented below (all SF values are on 3/8" basis).

The proposed monthly PSEL for PM, which includes the emission units Roads-P, Roads-U, Mat V1, and Mat-S is 27860 pounds per month or:

$$27,860 \text{ lbs PM/month} \times 1 \text{ month}/744 \text{ hrs of operation} \\ = 37.4 \text{ pounds PM/hour}$$

The attached calculation detail sheets show that the emissions from Mat V1 contribute 0.1 pounds per hour to this PSEL or:

$$0.1 \text{ lbs PM/hr} \times 1 \text{ hour}/21 \text{MSF} \\ = 0.005 \text{ lbs PM}/1,000 \text{ SF}$$

As shown in the attached detail sheets, Mat-V2 emissions in the AI emission unit are estimated to be 42 pounds PM per year or:

$$42 \text{ pounds PM/year} \times 1 \text{ year}/8,760 \text{ hours} \\ = 0.005 \text{ lbs PM}/\text{hour}$$

Convert to a 1000 SF basis:

$$0.005 \text{ lbs PM}/\text{hour} \times 1 \text{ hour}/21 \text{ MSF} \\ = 0.0002 \text{ lb PM per } 1000 \text{ SF}$$

Hence the total PM emissions from Mat-V1 and Mat-V2 are:

$$0.005 \text{ lbs PM}/1000 \text{ SF (Mat V-1)} + 0.0002 \text{ lbs PM}/1000 \text{ SF (Mat V-2)} \\ = 0.0052 \text{ lbs PM}/1000 \text{ SF on a } 3/8" \text{ basis}$$

The PSELs are based on throughputs and emission factors that are specified in the permit. Emission factor verification testing is required to be performed at the specified maximum production capacity. A permit modification would be required for the facility to increase the production levels and emission factors used to estimate the emissions for the PSELs. Therefore, since the PSEL is significantly more stringent than the board product limit, compliance with the PSELs ensures compliance with the board product rule. A table below summarizes the Veneer Manufacturing Limit and the PSEL.

	Pounds PM/ 1000 SF
Total from EUs subject to the VML (MAT-V1, MAT-V2)	0.0052

Veneer Manufacturing Limit	1.0
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MONITORING REQUIREMENTS

33. Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, where the applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. In addition, the permit includes monitoring of operating parameters for the boilers and pollution control devices. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit.

GENERAL TESTING REQUIREMENTS

34. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntarily conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.
35. Periodic source testing of the boiler and veneer dryers is also required to demonstrate compliance and verify that compliance is achieved while operating within certain specified parameter operating ranges.

RECORDKEEPING REQUIREMENTS

36. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating short and long-term plant site emissions.

REPORTING REQUIREMENTS

37. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a log book attached to the annual report. Emissions fees reports are required annually.

GENERAL BACKGROUND INFORMATION

38. The proposed permit is a replacement of an existing Air Contaminant Discharge Permit (ACDP 200524) which was issued on 04/01/89. The ACDP was originally scheduled to expire on 03/31/99.
39. Permits issued or required by the Department of Environmental Quality for this source include a NPDES permit for stormwater.
40. This source is located in an area that is in attainment for all criteria pollutants.
41. The source is located within 100 kilometers of two Class I air quality protection areas: Diamond Peak Wilderness area and Three sisters Wilderness area.

COMPLIANCE HISTORY

42. The facility was inspected on 05/20/92, 08/18/93, 06/21/94, 10/17/96, and 3/24/00 and was found to be in compliance. During that time, no complaints were received and no enforcement actions have been taken against this source.

ADDITIONAL REQUIREMENTS

43. This source is not currently subject to federal regulations for New Source Performance Standards (NSPS).
44. This source is not currently subject to federal regulations for New Source Review/Prevention of Significant Deterioration (PSD).

PUBLIC NOTICE

45. This permit was on public notice from October 6, 2000, to November 8, 2000. At Willamette Industries, Inc.'s request, a public hearing was held on November 7, 2000, in the LRAPA Conference Room at 1010 Main Street, Springfield, Oregon. No members of the public attended the hearing and no written comments were received during the comment period.

The proposed permit was sent to EPA on November 14, 2000, for a 45-day review period. LRAPA requested and EPA agreed to an expedited review because there were no substantive or adverse comments during the comment period. The public will have 105 days (45-day EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.