

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

Rosboro Lumber Company
2509 Main Street
Springfield, Oregon 97477

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PERMITTEE IDENTIFICATION

1. Rosboro Lumber Company owns and operates a sawmill/planing mill, gluelam beam plant, veneer mill and plywood plant located at 2509 Main Street in Springfield, Oregon.

FACILITY DESCRIPTION

2. The Main Street Plant manufactures wood products by processing softwood logs into finished dimensional lumber and green veneer, processing softwood lumber into glue laminated beams, and processing green softwood veneer into dry veneer or plywood. These processes also result in the following by-products: Chips, sawdust, sanderdust, shavings, and hog fuel. The manufacturing processes are supported by various maintenance and trucking activities and operating hog fuel fired boilers.

OPERATING SCENARIO

3. The facility has one operating scenario to cover all proposed operations.

EMISSION UNIT AND CONTROL DEVICE IDENTIFICATION

4. Boilers 1, 2 and 3 (EU-01):

Three hog fuel fired boilers with rotoclones for particulate control and a steam gage to monitor steam flow rate. Permit requires the installation of a residual oxygen monitor as an action level monitoring device to ensure good combustion.

5. Plantwide fugitives (EU-02):

Fugitive emissions from material handling equipment throughout the facility.

6. Cyclones (EU-03A and EU-03B):

Nine material handling cyclones for transporting wood waste and hog fuel throughout the facility.

7. Baghouse (EU-04A and EU-04B):

Four baghouses controlling emissions from material handling processes.

8. Plantwide VOC (EU-05):

Emissions from glues, resins, paints and inks which are not addressed under any other emissions unit.

9. Veneer Dryers (EU-6):

Veneer dryers which are vented to the hog fuel fired boilers. Compliance demonstration for veneer dryer visibility is only required when emissions are not being controlled through combustion in the boilers.

10. Log Vats (EU-7):

Log vats used to prepare logs to be peeled into veneer.

11. Dry kilns (EU-8)

Steam heated kilns for drying lumber.

12. Aggregate Insignificant Activities:

CATEGORICALLY INSIGNIFICANT ACTIVITIES

13. Rosboro Lumber Company has the following categorically insignificant activities on site:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical or compound regulated under 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 per 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
- Janitorial activities
- Personal care activities
- Instrument Calibration
- Grounds-keeping activities including, but not limited to, building painting and road and parking lot maintenance
- 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 or ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum processing devices but excluding research and development facilities
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air vents from air compressors
- Demineralized water tanks
- Electrical charging stations
- Fire brigade training
- Instrument air dryers and distribution
- Office activities
- Process raw water filtration systems
- Blueprint making
- 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
- Vacuum sheet stacker vents
- Emissions from waste water discharges to publicly owned treatment works (POTW) provided the source is authorized to discharge to the POTW, not including on-site waste water treatment and/or holding

- facilities
- Log ponds
 - Storm water settling basins
 - Fire suppression and training
 - Paved roads and paved parking lots within an urban growth boundary
 - 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, Doryopteris and similar equipment
 - Boiler lowdown tanks
 - Ash piles maintained in a wetted condition and associated handling systems and activities
 - Oil/water separators in effluent treatment systems
 - On-site storage tanks not subject to any NSPS, including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
 - Combustion source flame safety purging on startup

AGGREGATE INSIGNIFICANT EMISSIONS

14. The PM and PM₁₀ emissions from unpaved roads are estimated to be 0.4 tons/yr and 0.2 tons/yr respectively.

EMISSION LIMITS AND STANDARDS

15. The following conditions do not appear in the Title V operating permit as they existed in ACDP No. 207050 because of reasons given below:

Monitoring Recordkeeping and Reporting Conditions: These conditions have been replaced with the standard Title V language and requirements.

Plant Site Emission Limit: PSEL has been recalculated to include all activities and equipment at the facility.

General Conditions: These conditions have been replaced with the standard Title V General Conditions.

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION

16. The following emissions summaries have been calculated based on individual emissions units. The calculation is not intended to represent emissions limits for individual emissions units.

Original PSEL

17. Baseline Operating Schedule:

- a. Boilers: 24 hours/day x 7 days/wk x 52- week/year = 8,700 hours/year
b. Veneer Dryers: 24 hours/day x 7 days/week x 52- week/year = 8700 hours/year

18. The *Baseline Production Rates* were as follows:

Production or Process	Period	Rate	Units
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Parameter			
Boilers	Annual Production	694,260	Mlbs steam
Veneer Dried	Annual Veneer Dried	83,000	MSF - 3/8" basis

19. *Baseline Emissions Rates (tons/yr):*

Emissions Unit ID	PM	PM ₁₀	CO	NO _x	SO ₂	VOC
Boilers	139	139	1041	108	4.9	45
Plantwide fugitives	41	41				
Cyclones	20	20				
Baghouses	0.1	0.1				
Plantwide VOC (not listed elsewhere)	--	--				88
Veneer Dryers	42	42				13
Log vats	--	--				3.1
Dry kilns	--	--				15
Press vents						3.5
Aggregate Insignificant	1.0	1.0	1.0	1.0	1.0	1.0
Total	244	244	1042	109	5.9	169

Negl. = Less than 0.1 tons/yr
 AI = Aggregate Insignificant
 NA = Not Applicable

CURRENT PLANT SITE EMISSIONS LIMITS

20. The plant can be operated as much as 24 hours per day, 7 days per week, and 52 weeks per year.
21. 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
Boilers	Annual Production	760,933	Mlbs steam
Veneer Dried	Annual Veneer Dried	172,800	MSF - 3/8" basis

22. The current annual PSELS (tons per year) are shown below:

Emissions Unit ID	PM	PM ₁₀	CO	NO _x	SO ₂	VOC
Boilers	152	152	1141	118	5.3	49
Plantwide fugitives	41	41				
Cyclones	16	16				
Baghouses	0.2	0.2				
Plantwide VOC (not listed elsewhere)						16
Veneer Dryers						2.6
Log vats						8.3
Press vents						9.2
Dry kilns						93
Aggregate Insignificant (AI)	1.0	1.0	0	1.0	1.0	1.0
Total	213	213	1141	119	6.3	180

AI = Aggregate Insignificant
 NA = Not applicable
 Negl. = Less than 0.1 ton per year

SIGNIFICANT EMISSION RATE

23. The PSEL 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 and is shown below. No further air quality analysis is required for these pollutants.

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Increase from baseline (tons/year)	SER (tons/year)
Particulate, PM	244	213	-31	25
Particulate, PM ₁₀	244	213	-31	15
CO	1042	1141	99	100
NO _x	109	119	10	40
VOC	169	180	11	40
SO _x	5.9	6.3	0.4	40
Pb	NA	NA	NA	0.6

HAZARDOUS AIR POLLUTANTS

24. The facility is not expected to have the potential to be a major HAP source. The plywood MACT standard is scheduled to be promulgated by November 15, 2000.

TOXIC AND FLAMMABLE SUBSTANCE USAGE

25. The following toxic and flammable substances are used at the facility in the approximate quantities listed below:

CAS Number	Chemical Name	Insignificant	1,001-10,000 lbs/yr	10,001-20,000 lbs/yr	20,001-50,000 lbs/yr	>50,000 lbs/yr
108952	Phenol					X
50-00-0	Formaldehyde			X		
14742-28-8	Methyl Alcohol	X				
110543	Hexane	X				
1330207	Xylene	X				
71556	Methyl Chloroform	X				
108883	Toluene	X				
100425	Styrene	X				
111422	Diethanolamine	X				
100414	Ethyl Benzene	X				

STRATOSPHERIC OZONE-DEPLETING SUBSTANCES

26. 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, does 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.

MONITORING REQUIREMENTS

27. 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.

728. 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.

TEST METHODS AND PROCEDURES

29. 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.

RECORDKEEPING REQUIREMENTS

30. 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

31. 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 recorded in a log book attached to the annual report. Emissions fees reports are required annually.

GENERAL BACKGROUND INFORMATION

32. The proposed permit is a replacement for an existing Air Contaminant Discharge Permit (ACDP 207050) which was issued on January 1, 1995. The ACDP was originally scheduled to expire on December 31, 1998
33. Permits issued or required by the ODEQ for this source include a NPDES permit for washwater discharges and a septic system permit.
34. This source is located in an area that is nonattainment for PM₁₀ pollutant.
35. The source is located within 100 kilometers of two (2) Class I air quality protection areas: Diamond Peak Wilderness and Three Sisters Wilderness area.

COMPLIANCE HISTORY

36. The facility was inspected on October 22, 1993, January 26, 1995, August 29, 1996, May 22, 98, January 13, 99 and December 28, 99 and found to be in compliance with permit conditions.

ADDITIONAL REQUIREMENTS

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

PUBLIC NOTICE

39. The draft permit was placed on public notice from October 9, 2000, to November 8, 2000. One written comment was received during the comment period. Rosboro corrected the baghouse numbers (from Baghouse 26 to Baghouse 5) for the pollution control device for EU-03A in Table 1 in the permit. One additional administrative change was made: the item numbering was corrected in the review report.

This proposed permit was sent to EPA on November 15, 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.

dpk
12/15/00

APPENDIX: Emissions Detail Sheets
Baseline Emission Rate: Particulate/PM₁₀

Emissions Detail Sheets
Baseline Emission Rate: NO_x

Emissions Detail Sheets
Baseline Emission Rate: CO

Emissions Detail Sheets
Baseline Emission Rate: SO₂

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Expiration Date: December 17, 2005

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Emissions Detail Sheets
Baseline Emission Rate: VOC

Emissions Detail Sheets
Proposed PSEL: Particulate/PM₁₀