

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

**Lane Regional Air Pollution Authority  
1010 Main Street  
Springfield, Oregon 97477  
Telephone: (541) 736-1056**

Issued in accordance with the provisions of  
ORS 468A.040 and based on the land use compatibility findings included in the permit record.

**ISSUED TO:**

Trus Joist MacMillan  
195 North Bertelsen Road  
Eugene, Oregon 97402

**INFORMATION RELIED UPON:**

Permit Number: 208256  
Modification Applications Received:  
8/19/98 and 11/24/98

**PLANT SITE LOCATION:**

195 North Bertelsen Road  
Eugene, Oregon 97402

**LAND USE COMPATIBILITY STATEMENT:**

From: Lane County  
Dated: 9/05/96

**ISSUED BY LANE REGIONAL AIR POLLUTION AUTHORITY**

\_\_\_\_\_  
Barbara J. Cole, Director

\_\_\_\_\_  
Date

Nature of Business: Laminated Veneer Lumber Manufacturing

Primary SIC: 2439 Laminated Veneer Lumber Manufacturing

**RESPONSIBLE OFFICIALS:**

Name: Patrick Smith  
Title: Senior Vice President,  
Manufacturing Operation

**FACILITY CONTACT PERSON:**

Name: Dale F. Wonn  
Title: EHS Coordinator  
Phone: (541) 607-8317

Alternate 1: Joe Fyie, Plant Manager

Alternate 2: Bob McFarland, General Manager, Western Operations

**Modification Number 1**

In accordance with OAR 340-028-2260, LRAPA Title V Operating Permit No. 208256 has been revised and now reads as follows. This modification also serves as a permit renewal.

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**LIST OF ABBREVIATIONS USED IN THIS PERMIT**

AQMA	Air Quality Management Area
ASTM	American Society of Testing and Materials
BDT	bone dry ton
BF	board feet
CFR	Code of Federal Regulations
CO	carbon monoxide
dscf	dry standard cubic foot of gas volume at 29.92" Hg and 68°F
EF	emission factor
EPA	US Environmental Protection Agency
EU	emissions unit
FCAA	Federal Clean Air Act
gr/dscf	grain per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by OAR 340-32-130
ID	identification number
I&M	inspection and maintenance
LRAPA	Lane Regional Air Pollution Authority
LVL	laminated veneer lumber
MB	material balance
MBF 1000	board feet
Mlb	1000 pounds
MMscf	million standard cubic foot of natural gas
MSDS	material safety data sheet
MSF 1000	square feet
NA	not applicable
NO <sub>x</sub>	oxides of nitrogen
O <sub>2</sub>	oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	operation and maintenance
PCD	pollution control device
PM	particulate matter
PM <sub>10</sub>	particulate matter less than 10 microns in size
PSEL	Plant Site Emission Limit
RMP	Risk management plans
SO <sub>2</sub>	sulfur dioxide
ST	source test
VE	visible emissions
VMT	vehicle mile traveled
VOC	volatile organic compound

**PERMITTED ACTIVITIES**

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-28-2100, 340-28-2200(2) and LRAPA 34-180]
2. All conditions in this permit are federally enforceable and LRAPA enforceable except Conditions 5, 6, and G21 which are enforceable by LRAPA only.

**EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION**

3. The emissions units regulated by this permit are the following: [OAR 340-28-2120(3)]

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Wood Residual Handling System Baghouses 1, 2, & 3	WRH	None	NA
Veneer Drying Process Veneer Dryer 1 Veneer Dryer 2 Veneer Dryer 3	Dryers	Regenerative Thermal Oxidizer	RTO-1
Laminated Veneer Lumber (LVL) Presses Presses 1 through 9	Presses	None	NA
I-Line Process, VOC only	I-Line	None	NA
I-Line Oven	I-Oven	None	NA
Truck Loading Fugitives	TL Fugitives	None	NA
Aggregate Insignificant Activities Block Panel Cutting (PM/PM <sub>10</sub> ) Carpentry Shop (PM/PM <sub>10</sub> ) Unpaved Roads (PM/PM <sub>10</sub> ) Product Sealant (VOC) Ink (VOC)	AI	None	NA

**EMISSION LIMITS AND STANDARDS**

The following tables contain summaries of applicable requirements other than the Plant Site Emission Limits (PSEL), along with the monitoring methods for the emissions units to which those requirements apply.

**Table 1. Facility-Wide Emission Limits and Standards:**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015-2 and 32-060*	4	Fugitive dust	Minimize fugitive dust emissions	I&M Recordkeeping	29 and 30
50-020	5	Odors	Nuisance/odor	Recordkeeping	31
32-055	6	PM fallout	Less/or equal to 250 $\mu$	I&M Recordkeeping	31
33-030	7	Concealment & masking	Prohibited	I&M Recordkeeping	31
51-015	8	SERP	Reduce emissions	Recordkeeping	32
40 CFR Part 68	9	RMP	See the rule	Recordkeeping	9

\* As contained in the Oregon SIP, but removed from LRAPA's rules on 12-16-86 and replaced with 48-015 2.

4. 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 becoming airborne. The permittee shall minimize fugitive dust by performing the following activities: [LRAPA 48-015(2), LRAPA 32-060]
  - a. At least once per week, excluding periods of rain and freezing weather, the permittee shall inspect all production operations for material spillage and clean as necessary.
  - b. At least once per quarter, the permittee shall inspect and repair, if necessary, all outside material transfer points, truck bin, and drop points.
5. The permittee shall not cause or allow the emission of odorous matter so as to create nuisance conditions off the permittee's property. [LRAPA 50-020] This condition is only enforceable by LRAPA.
6. The permittee shall not emit 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] This condition is only enforceable by LRAPA.
7. 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 emission of air contaminants which would otherwise violate these rules. [LRAPA 33-030]
8. In the event an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene area by LRAPA, the permittee shall take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee shall take action when the permittee first becomes aware of such declaration whether through news media, direct contact with LRAPA, or from other sources.

9. The permittee shall comply with the applicable requirements of 40 CFR Part 68, including all monitoring, recordkeeping, and reporting requirements.

**Table 2. Emissions Unit Specific Emission Limits and Standards:**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
WRH	32-010-1.B 32-010-3	10	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	35
	32-015-2	11	PM	0.1 gr/dscf	I&M Monitoring	36
	32-045	12	PM/PM <sub>10</sub>	Process weight limit	Parameter Monitoring	36
Dryers	32-015-2	13	PM	0.1 gr/dscf	Parameter Monitoring	37
	33-060-3.A (2)(a) 33-060-3.A (2)(b)	14	Visible Emissions	10% average (see below); 20% maximum as a 6 min. avg.	VE Periodic Monitoring	35
	33-060-3.A.(5)	16	Highest and Best	Operate control device RTO-1 whenever green veneer is dried	Parameter Monitoring	33 and 34
	33-060-3.A.(5) 32-007(2)	17	Highest and Best	Operate temperature monitor on control device RTO-1	Recordkeeping	38
	33-060-3.A.(5)	15	Highest and Best	Minimize emissions	O&M Recordkeeping	37
	33-060-3.A.(6)	18	Concealing Emissions	Not allowed	O&M Recordkeeping	37
	32-045	12	PM/PM <sub>10</sub>	Process weight limit	Parameter Monitoring	37
TL Fugitives, I-oven and Presses	32-010-1.B	19	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	29 and 35

10. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit WRH for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010-1.B and 32-010-3] Visible emissions shall be measured in accordance with Condition 35.

11. The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot, from emissions unit WRH. [LRAPA 32-015-2] Particulate matter emissions shall be measured in accordance with condition 27.
12. The permittee shall not cause or allow the emission of particulate matter in any one (1) hour from any baghouses included in emissions units WRH and dryers in excess of the amount shown in Table 1, LRAPA 32-045, for the process weight allocated to the process. [LRAPA 32-045] Particulate matter emissions for dryers shall be measured in accordance with Condition 26. Particulate matter emissions for WRH shall be measured in accordance with Condition 27.
13. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grain per standard cubic foot from emissions unit dryers. [LRAPA 32-015-2] Particulate matter emissions shall be measured in accordance with Condition 26.
14. The permittee shall not cause or allow the operation of emission unit dryers such that visible air contaminants emitted from each dryer stack, emission point, or control device RTO-1 exceed:
  - a. An average operating opacity of 10% [LRAPA 33-060-3.A(2)(a)]; or
  - b. A maximum opacity of 20% [LRAPA 33-060-3.A(2)(b)].

"Average operating opacity" means the opacity of emissions determined using EPA Method 9 on any three (3) days within a 12-month period which are separated from each other by at least 30 days; a violation of the average operating opacity limitation is judged to have occurred if the opacity of emissions on each of the three (3) days is greater than the specified average operating opacity limitation. [LRAPA 33-60-1.A]

"Maximum opacity" means the opacity as determined by EPA Method 9 (average of 24 consecutive observations). [LRAPA 33-060-1.G] Visible emissions shall be measured in accordance with Condition 35.

15. Each veneer dryer shall be maintained and operated at all times such that air contaminant generating processes shall be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. [LRAPA 33-060-3.A(5)] The permittee shall inspect all veneer dryers for fugitive emissions in accordance with an inspection and maintenance plan. The inspection and maintenance plan shall be prepared within six (6) months of the issuance date of this permit and reviewed at least once every 12 months and revised for any necessary revision as determined by maintenance personnel.
16. The permittee shall provide a control device for emission unit dryers in accordance with the following schedule:
  1. No later than May 15, 1999, the permittee shall complete construction, other than final hookup of the gas line and duct work, of control device RTO-1 and certify in writing to LRAPA that this phase of construction has been completed. The final phase of construction shall be completed within 30 days after issuance of this permit.
  - b. Within 30 days after issuance of this permit, the permittee shall demonstrate that emission unit dryers are capable of operating at 90% to 100% of normal maximum operating rate, in compliance with Condition 14, by

completing a modified EPA Method 9 source test in accordance with ODEQ's Source Sampling Manual and submitting the test results to LRAPA.

3. After the date of the compliance test performed in accordance with Condition 16b, control device RTO-1 shall be operated at all times when green veneer is being dried. Compliance with this requirement shall be monitored in accordance with Conditions 33 and 34. [LRAPA 33-060-3.A(5)]
  
17. The combustion temperature of control device RTO-1 shall be continuously monitored and recorded during operation using a device having an accuracy of plus/minus 1% of the measured temperature in degrees Fahrenheit. Corrective action shall be taken if, prior to source testing the unit, the combustion temperature falls below 1,450° F. After source testing the unit, corrective action shall be taken if the combustion temperature falls more than 50 degrees below the average temperature measured during the source test. A deviation from this action level is not necessarily a violation of an emission standard. [LRAPA 33-060-3.A(5) and 32-007-2]
  
18. The permittee shall not willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission which would otherwise violate Conditions 13 and 14. [LRAPA 33-060-3.A(6)]
  
19. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions units TL fugitives, presses, or I-oven for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010-1.B]

**Table 3. General Emission Limits and Standards that apply to Insignificant Activities:**

Applicable Requirements	Condition Number	Pollutant/Parameter	Limit/Standard
32-010-1.B and 32-010-3	20	Visible Emissions	20% opacity
32-030	21	PM/PM <sub>10</sub>	0.1gr/dscf
32-015-2	22	PM/PM <sub>10</sub>	0.1 gr/dscf

20. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water, from any categorically insignificant or aggregate insignificant source or activity. [LRAPA 32-010-1.B and 32-010-3] Visible emissions shall be measured in accordance with Condition 28.
21. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, from any fuel-burning equipment and refuse-burning equipment that are categorically insignificant activities, or any activity included in the aggregate insignificant emissions. [LRAPA 32-030] Particulate matter emissions shall be measured in accordance with Condition 28.
22. The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grains per dry standard cubic foot from any non-fugitive insignificant air contaminant source. [LRAPA 32-015-2] Particulate matter shall be measured in accordance with Condition 28.

**PLANT SITE EMISSION LIMITS (PSELS)**

23. The short-term plant site emissions shall not exceed the following: [LRAPA 34-060-4 and 34-060-5]

Emissions Unit ID Number	Pollutant	Short-Term PSEL	Units	Monitoring Requirements	
				Method	Permit Condition
WRH, Dryers	PM	925	lbs/day	EF Recordkeeping	39
	PM <sub>10</sub>	925	lbs/day	EF Recordkeeping	39
	CO	24.3	lbs/day	EF Recordkeeping	39
	NO <sub>x</sub>	327	lbs/day	EF Recordkeeping	39
	SO <sub>2</sub>	1	lb/day	EF Record-keeping	39
	VOC	267.5	lbs/day	EF Recordkeeping	39
I-Line Oven, Presses, I-Line Process, and Truck Loading	PM	688	lbs/month	EF Recordkeeping	39
	PM <sub>10</sub>	688	lbs/month	EF Recordkeeping	39
	CO	651	lbs/month	EF Recordkeeping	39
	SO <sub>2</sub>	10	lbs/month	EF Recordkeeping	39
	NO <sub>x</sub>	1628	lbs/month	EF Recordkeeping	39
	VOC	11,264	lbs/month	EF Recordkeeping	39

24. The annual plant site emissions (tons per year) for the entire facility shall not exceed the following: [LRAPA 34-060-4 and 34-060-5]

Pollutant	PSEL	Monitoring Requirements	
		Method	Permit Condition
PM	61.4	EF and I&M Recordkeeping	39 and 40
PM <sub>10</sub>	61.4	EF and I&M Recordkeeping	39 and 40
CO	14.0	EF Recordkeeping	39 and 40
NO <sub>x</sub>	32.3	EF Recordkeeping	39 and 40
SO <sub>2</sub>	Negl.	EF Recordkeeping	39 and 40
VOC	62.6	EF and MB Recordkeeping	39 and 40

**TESTING REQUIREMENTS** [LRAPA 34-070 and 340-028-2130(3)(a)]

25. Unless otherwise specified in this permit, the permittee shall conduct all testing required by this permit in accordance with the ODEQ's Source Sampling Manual.

1. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
2. Unless otherwise specified by a permit condition, all compliance source tests shall be performed at 90 to 110% of the normal maximum operating rate. For the purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the operating rates during a 12-month period immediately preceding the source test.
3. Each source test shall consist of at least three (3) test runs and the emissions results shall be reported as the arithmetic average of all valid test runs. There must be at least two (2) valid test runs for a source test to be accepted.

26. Oregon DEQ Method 7 and EPA Methods 1 through 4 shall be used for measuring particulate matter emissions from the control

device for emissions unit dryers. Each test run shall be a minimum of 60 minutes long with a minimum sample volume of at least 31.6 dscf. Test results shall be reported as grains per dry standard cubic feet (gr/dscf), pounds per hour, and pounds per ft<sup>3</sup> of veneer dried.

- a. At least one (1) initial source test shall be performed on the control device for the dryers (RTO-1). Each test shall be performed while drying Douglas Fir/Larch green veneer at maximum average zone temperature and to final moisture content below 10%.
4. During each test run, the permittee shall record the following information:
    1. species of veneer dried;
    2. amount of veneer dried (ft<sup>3</sup>);
    3. amount of redry (%);
    4. visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 7 test run, unless weather conditions are such that it is not possible to read opacity;
    5. dryer conditions including dryer temperatures by zone and drying time; and
    6. combustion temperature of control device RTO-1.
27. Oregon DEQ Method 8 shall be used for measuring particulate matter emissions from the baghouses. Each test run shall be a minimum of 15 minutes long with a minimum sample of 225 dscf. Test results shall be reported as grain per dry standards cubic feet (gr/dscf) and pounds per hour.
1. A representative baghouse (BH1) shall be tested once during the permit term.
  2. During each test run, the permittee shall record the following information:
    1. flow rate; and
    2. visible emissions measured by EPA Method 9 for a minimum of six (6) minutes during or within 30 minutes just before or after each Oregon Method 8 test run.
28. Although source testing is not required by this permit for the conditions listed below, if source testing is conducted in addition to the monitoring specified in this permit, the permittee shall use the following test methods and averaging

times to measure the pollutant emissions:

Permit Condition	Test Method	Averaging Time	Special Conditions
19 and 20	Modified EPA Method 9 in accordance with ODEQ's <u>Source Sampling Manual</u>	Aggregate of three (3) minutes in any 60- minute period	Each Method 9 observation shall represent a period of 15 seconds for the purpose of determination the aggregate of time in a 60-minute period that the visible emissions are greater than the opacity limit. The test duration may be less than 60 minutes if a violation of the standard is documented before the full 60-minute observation period is completed.
21 and 22	ODEQ Methods 5, 7, or 8	Average of three (3) one-hour test runs	ODEQ Method 8 is for sources with exhaust gases at essentially ambient conditions (e.g., material handling cyclones); ODEQ Method 7 is for direct contact combustion sources (e.g., particle and veneer dryers); ODEQ Method 5 is for indirect contact fuel burning equipment (e.g., boilers) and any other source.

**MONITORING REQUIREMENTS [OAR 340-28-2130(3)(a)]**

**Facility-wide Monitoring:**

29. At least once a week, the permittee shall visually survey the facility for any sources of excessive fugitive dust emissions. For the purpose of this survey, excessive emissions are considered to be any visible fugitive dust emissions that leave the plant site boundaries. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If sources of excess fugitive emissions are identified during the survey, the permittee shall either:

1. Immediately take corrective action to minimize the fugitive dust emissions; or
2. Conduct EPA Method 9 within 24 hours.

30. The permittee shall record in a log the date, time, and action taken for all I&M activities listed in Condition 4.
31. The permittee shall maintain a log for monitoring pertaining to Conditions 5, 6, and 7, recording all written complaints or complaints received via telephone or facsimile by the responsible official or a designated appointee. Said log shall also record permittee's actions to investigate, make a determination as to the validity of the complaint, and address within two (2) working days of receiving the complaint or within such longer time (not to exceed five (5) working days) as is reasonably necessary. If more than five (5) days are needed to resolve the problem, the permittee shall notify LRAPA immediately upon making that determination.
32. The permittee shall maintain written records of air pollution episodes and emission reduction actions taken pertaining to Condition 8.

**Emissions Units Monitoring:**

33. To assure that control device RTO-1 is operated whenever green veneer is being dried, the permittee shall install and maintain an interlock between the veneer dryers and RTO bypass damper sufficient to ensure that, except during periods of manual override, each veneer dryer's bypass damper(s) is/are closed whenever that dryer's temperature exceeds 300° F. The permittee shall log the start time and the end time of any period when the interlock is manually overridden, the reason for the override, and the type of veneer (redry or green) in the dryer(s) during the time that the dryer's bypass damper(s) is/are manually overridden.
34. The permittee shall record the amount of green veneer dried, redried veneer, and total veneer throughput to the dryers on a daily basis.
35. The permittee shall monitor visible emissions into the atmosphere from emissions units presses, WRH, and dryers in accordance with the following procedures, test methods, and frequencies:
  1. EPA Method 9 shall be used to determine opacity, in accordance with ODEQ's Source Sampling Manual. Prior notification and a pre-test plan are not required to be

submitted to the LRAPA for each test or survey conducted. Each observation period shall be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period shall be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.

2. Visible emissions testing, using EPA Reference Method 9, may be waived for emission units presses, WRH, and dryers provided both of the following conditions are met:
  1. The permittee shall conduct a 6-minute visible emissions survey of each emissions unit, using EPA Reference Method 22; and
  2. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
3. The permittee shall use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:
  1. The initial monitoring frequency for performing visible emission tests and/or surveys is as follows:

Emission Unit	Frequency
Dryers and Presses	Weekly
WRH	Monthly

2. If the surveys and/or observations conducted during six (6) consecutive weeks of operation show opacity within the applicable limits specified in Conditions 14 and 19, the surveys and/or observations need only be done once per month.
3. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 10, the surveys and/or observations need only be done once per quarter.
4. If an exceedance occurs, the surveys and/or observations for the exceeding monitoring point will start over with either weekly or monthly surveys and/or observations, according to the monitoring

frequency table above.

4. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.
  5. If the observer is unable to conduct the survey and/or Method 9 tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.
36. The permittee shall maintain records of inspection and maintenance procedures for the baghouses for emissions unit WRH:
1. Monthly inspection records of the WRH system (piping, cyclones, and baghouses) recorded on inspection forms.
  2. Maintenance activity records of replacement of baghouse bags on occurrence (when broken and routinely) recorded in a maintenance log.
37. The permittee shall maintain weekly records of inspection and maintenance procedures for the veneer dryers.
38. The permittee shall install, calibrate, maintain, and operate a continuous temperature monitoring system for control device RTO-1 for monitoring pertaining to Condition 17.
- a. Real time data for RTO-1 operating temperature shall be collected at least once every minute that one (1) or more of the veneer dryers is drying green veneer. The data shall be displayed upon request.
  - b. Minimum data availability shall be 75% of the operating hours per day and 90% of the operating hours per calendar quarter. An operating hour is an hour during which green veneer is dried in at least one (1) of the dryers; an operating day is a day in which green veneer is dried in at least one (1) of the dryers. Monitor availability shall be determined excluding periods of calibrations and

routine maintenance.

- c. The permittee shall record in a log any deviations from the temperature action levels and shall record the corrective actions taken in response to action level deviations.
- d. The permittee shall maintain and operate the continuous temperature monitoring system for control device RTO-1 in accordance with written inspection and maintenance procedures. The inspection and maintenance procedures shall be submitted to and approved by LRAPA.

**Plant Site Emission Limits (PSELs) Monitoring:**

39. The permittee shall determine compliance with the PSELs using the following monitoring and calculation procedures:

- 1. The permittee shall monitor and maintain records of the following process parameters:

Emissions Unit(s)	Process Parameter	Pollutant(s)	Measurement Technique	Measurement Frequency
Dryers	Actual veneer dried and redried by species and/or type (cu ft/day, cu ft/yr)	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Production Records	Daily
Oven and Press Heaters	Natural gas used (MMcf/month, MMcf/yr)	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
WRH	Hours of operation	PM and PM <sub>10</sub>	Operation Records	Daily
Presses and I-Line	Amount and type of adhesive used	VOC	Purchase Records	Monthly
Truck Loading Fugitives	Amount of wood residuals trucked off site	PM and PM <sub>10</sub>	Production Records	Monthly

2. The permittee shall determine compliance with the PSEs by calculating daily, monthly and annual emissions for each emissions units using the following formula and process parameters listed above, and the emission factors listed in Condition 40:

$$E = P_{eu} \times Ef_{eu} \times K$$

where: E = pollutant emissions in lbs/hr,  
lbs/day, lbs/month, or tons/yr

$P_{eu}$  = process parameter identified in  
Condition 39

$Ef_{eu}$  = emission factor identified for each  
emissions unit and pollutant in  
Condition 40

K = conversion constant is 1 for daily  
emissions calculation and  
1 ton/2000 lbs for annual emissions

calculations.

40. Table of emission factors to be used for calculating short- and long-term emissions:

Emission s Unit(s)	Polluta nt	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
				Yes/No	Test Method
WRH	PM	0.005	grain/scf	yes	ODEQ Method 8
	PM <sub>10</sub>	0.005	grain/scf	no	NA
Dryers (non- redry)*	PM	0.0084	lb/cu ft	yes	ODEQ Method 7
	PM <sub>10</sub>	0.0084	lb/cu ft	no	NA
	CO	0.000128	lb/cu ft	no	NA
	NO <sub>x</sub>	0.0086	lb/cu ft	yes	EPA Method 7E
	SO <sub>2</sub>	0.00002	lb/cu ft	no	NA
	VOC	0.000704	lb/cu ft	yes	PA Method 25A
Dryers (redry)	PM	0.01664	lb/cu ft	no	NA
	PM <sub>10</sub>	0.01664	lb/cu ft	no	NA
	CO	0.00064	lb/cu ft	no	NA
	NO <sub>x</sub>	0.00384	lb/cu ft	no	NA
	SO <sub>2</sub>	0.00002	lb/cu ft	no	NA
	VOC	0.00704	lb/cu ft	no	NA
I-Oven and Press Heaters	PM	12.0	lbs/MMSCF	no	NA
	PM <sub>10</sub>	12.0	lbs/MMSCF	no	
	CO	40.0	lbs/MMSCF	no	
	NO <sub>x</sub>	100.0	lbs/MMSCF	no	
	SO <sub>2</sub>	0.6	lb/MMSCF	no	
	VOC	11.0	lbs/MMSCF	no	
I-Line	VOC	0.004	lb/lb adhesive	no	NA
Presses	VOC	0.0027	lb/lb adhesive	no	NA
TL Fugitive	PM	0.1	lb/BDT	no	NA
	PM <sub>10</sub>	0.1	lb/BDT	no	NA

*\*Note: The emission factors for redry apply to all veneer dried until after the compliance source test results are submitted to LRAPA in accordance with Condition 16.b.*

41. The permittee shall conduct emission factor verification tests on a representative emissions unit in accordance with the ODEQ's Source Sampling Manual for the emission units/emission factors identified in Condition 40 at least once during the permit term. **The emission factor verification tests shall be conducted within 180 days after issuance of this permit.**

1. The testing required in Conditions 26 and 27 may be used to satisfy this requirement in full or in part.
2. The permittee shall notify LRAPA at least 15 days prior to conducting any emission factor verification tests by submitting a source test plan in accordance with the ODEQ's Source Sampling Manual.
3. The permittee shall submit a summary of all emission factor verification tests required pursuant to this permit to LRAPA within 45 days of any test. The summary shall include the following information:
  1. emissions unit and monitoring point identification;
  2. emission results in pounds per hour;
  3. process parameters during the test (e.g., material throughput, steam production, etc.);
  4. control device operating parameters.
4. The emissions factors listed in Condition 40 are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs shall only be determined by the calculations contained in Condition 39.b of this permit using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 40, or others approved by LRAPA.

#### **RECORDKEEPING REQUIREMENTS [OAR 340-28-2130(3)(b)]**

42. The permittee shall maintain the following general records of required monitoring information that include the following:

1. the date, place as defined in the permit, and time of sampling or measurements;
2. the date(s) analyses were performed;
3. the company or entity that performed the analyses;
4. the analytical techniques or methods used;

5. the results of such analyses;
  6. the operating conditions as existing at the time of sampling or measurement; and
  7. the records of quality assurance for continuous monitoring systems (including, but not limited to, quality control activities, audits, and calibrations drift checks).
43. The permittee shall maintain specific records of required monitoring information that include the following:
1. weekly, monthly facility fugitive emissions inspection, maintenance, and corrective action log;
  2. visible emissions tests and surveys;
  3. pollution control device(s) inspection, maintenance, and repair log;
  4. daily and annual veneer dried in the dryers (cu ft);
  5. monthly and annual I-Line adhesive used;
  6. monthly and annual LVL adhesive used;
  7. monthly and annual natural gas used in I-Oven and press heaters;
  8. daily and annual hours of operation for emission unit WRH;
  9. monthly and annual truck-loading materials;
  10. excess emissions log;
  11. short- and long-term pollutant emissions for the entire facility;
  12. control device operating parameter logs; and
  13. Records of interlock overrides for RTO bypass damper, temperature log for and corrective action log for RTO, maintenance log for RTO;

Failure to record specific information required by this permit due to occasional and unintentional loss or omission of records shall not constitute a reportable permit deviation, as required by Condition G7, provided the permittee upon discovery of the missing records is able to reconstruct the required information from other available information, or the missing record is otherwise allowed by this permit.

44. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit shall also be retained for five (5) years from the date of issuance of the permit.

**REPORTING REQUIREMENTS [OAR 340-28-2130(3)(c)]**

45. The permittee shall submit four (4) copies of the semi-annual monitoring report, (using LRAPA-approved forms) covering the period January 1 to June 30, by August 30 of each year, unless otherwise approved in writing by LRAPA. Two (2) copies of the report shall be submitted to LRAPA, one (1) to ODEQ Air Quality Division, and one (1) copy to the EPA. The semi-annual monitoring report shall include the semi-annual compliance certification.
46. The permittee shall submit four (4) copies of the annual monitoring report, (using LRAPA-approved forms) covering the period January 1 to December 31 by March 15 of the following year. Two (2) copies of the report shall be submitted to LRAPA, one (1) to ODEQ Air Quality Division, and one (1) copy to the EPA.
47. The annual monitoring report shall consist of:
1. annual records of production and process information;
  2. emission fee report;
  3. excess emissions upset log; [OAR 340-28-1440] and
  4. second semi-annual compliance certification. [OAR 340-28-2160]
48. Other reporting requirements include the following:
1. source test plans; and
  2. emission factor verification testing summaries.
49. The regulatory agencies' addresses are as follows:
- |                       |                             |                                    |
|-----------------------|-----------------------------|------------------------------------|
| LRAPA                 | ODEQ - Air Quality Division | Air Operating Permits              |
| 1010 Main Street      | 811 SW Sixth Avenue         | US Environmental Protection Agency |
| Springfield, OR 97477 | Portland, OR 97204          | Mail Stop OAQ-107                  |
| (541) 736-1056        | (503) 229-5359              | 1200 Sixth Avenue                  |
|                       |                             | Seattle, WA 98101                  |
|                       |                             | (206) 553-4273                     |

**NON-APPLICABLE REQUIREMENTS**

50. LRAPA, state and federal air quality rules currently determined not applicable to the permittee are listed below:

1. The following rules are not applicable because this pollutant is not emitted by the facility:

LRAPA Title 32: rules 060 and 080.

2. The following rules are not applicable because the source is not in the source category cited in the rules:

OAR 340 Division 28: rules 2170 and 2180;  
OAR 340 Division 32: rules 0300 through 0380, 5000, 5530 (LRAPA 43-035), 5540 (LRAPA 43-020 & 025), 5550 (LRAPA 43-030), 5560, 5570, and 5580;  
LRAPA Title 33: rules 060(4), 060(5), 065, 070, and 075;  
LRAPA Title 34: rule 090;  
LRAPA Title 35: rules 001 through 070;  
LRAPA Title 46: rules 560 through 580, 590 through 620, 640 through 805; and  
LRAPA Title 50: all but 50-020.

3. The following rules are not applicable because the source is outside the special control area, non-attainment area or county cited in the rules:

OAR 340 Division 30; and  
LRAPA Title 39: rules 010 through 060.

4. The following rules are not applicable because the source does not have specific emissions units cited in the rules:

OAR 340 Division 24: rules 0025 and 0040;  
LRAPA Title 30: rules 015 through 060;  
LRAPA Title 32: rules 065(2), 070;  
LRAPA Title 33: rules 020, 045; and  
LRAPA Title 46: rules 550 through 556, 585, 586, 587, 625 through 630.

5. The following OARs are not applicable because the source does not burn the fuel type cited in the rules:

LRAPA Title 32: rules 065(1), 065(3).

6. The following OARs are not applicable because the method/procedure is not used by the facility:

OAR 340 Division 32: rules 250;  
LRAPA Title 33: rules 080(1), 080; and  
LRAPA Title 34: rules 060(8), 060(6); and  
LRAPA Title 47: rules 005, 015, 020, 030.

51. Federal applicable requirements currently determined not applicable to the permittee are listed below:

40 CFR Parts: 55, 57, 60 (except subpart A and appendices), 61 (except subpart A and M and appendices), 63 (except subpart A), 72, 73, 75, 76, 77, 78, 82 (except subpart F), and 85 through 89;  
Section 129 of the FCAA (Solid Waste);  
Section 183(e) of the FCAA (Consumer and commercial products); and  
Section 183(f) of the FCAA (Tank Vessels).

## **GENERAL CONDITIONS**

### G1. General Provision

Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

### G2. Reference Materials

Where referenced in this permit, the version of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. ODEQ Source Sampling Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A4;
- b. ODEQ Continuous Monitoring Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

### G3. Compliance [OAR 340-28-2120(3)(n)(C), 340-28-2130(6), and 340-28-2160(4)]

- a. The permittee shall comply with all conditions of the federal operating permit. Any permit condition

noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or for denial of a permit renewal application.

- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G4. Compliance Monitoring and Enforcement [LRAPA 34-015, 34-070(1), 34-070(3-5), 340-28-2130(3), 340-28-2160, 340-32-270]

- a. For the purpose of submitting semi-annual compliance certification reports, the permittee shall use, at a minimum, the information obtained from the monitoring requirements of this permit. The permittee shall not knowingly falsify or render inaccurate any monitoring device or method required to be maintained or followed by the permit.
- b. The information obtained from the monitoring required by this permit can be used directly for enforcement except as otherwise provided by this permit.

G5. Certification [LRAPA 34-015, 340-28-2120(5), 340-28-2130(3)(d), and 340-28-2160(2)]

Any document submitted to LRAPA pursuant to this permit shall contain certification by a responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and complete. The permittee shall promptly, upon discovery, report to LRAPA a material

error or omission in these records, reports, plans, or other documents.

G6. Excess Emissions Reporting [LRAPA 36-001 through 36-030]

a. The permittee shall report all excess emissions in accordance with LRAPA 36-001 through 36-030. In summary, the permittee shall immediately (i.e., as soon as possible but in no case more than one (1) hour after the beginning of the excess emission period) notify LRAPA by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance.

Notification shall, to the extent reasonably ascertainable at the time of notification, include the source name, nature of the emissions problem, name of the person making the report, name and telephone number of the contact person for further information, date and time of the onset of the upset condition, whether or not the incident was planned, the cause of the excess emission (e.g., startup, shutdown, maintenance, breakdown, or other), equipment involved in the upset, estimated type and quantity of excess emissions, estimated time of return to normal operations, efforts made to minimize emissions, and a description of remedial actions to be taken. Follow-up reporting shall be made in accordance with LRAPA direction and LRAPA 36-020 and LRAPA 36-025.

b. Notification shall be made to the appropriate office. The current LRAPA telephone numbers are:

LRAPA, 1010 Main Street, Springfield, Oregon  
Monday through Friday, 8 a.m. to 5 p.m., call:

(541) 736-1056

c. In the event of any excess emissions which occur 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.

d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee shall submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required in 36-010 and 36-015. New or modified procedures shall be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee shall abide by the

approved procedures and have a copy available at all times.

e. The permittee shall notify LRAPA of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if the source is located in a nonattainment area for a pollutant which may be emitted in excess of applicable standards.

f. The permittee shall maintain and submit to LRAPA a log of planned and unplanned excess emissions, on LRAPA approved forms, in accordance with LRAPA 36-025.

G7. Permit Deviation Reporting [OAR 340-28-2130(3)(c)(B)]

The permittee shall promptly report to LRAPA by telephone or in person, any deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventative measures taken. Deviations are instances when any permit condition is violated. "Prompt" is defined as within seven (7) days of the deviation.

G8. Open Burning [LRAPA Title 47]

The permittee is prohibited from conducting open burning, except as may be allowed by LRAPA 47-001 through 47-030.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-32-5600 through 340-32-5650 and OAR Chapter 340, Division 33, and LRAPA 43-015 (state/LRAPA-only enforceable)]

The permittee shall comply with OAR 340-32-5600 through 340-32-5650, OAR Chapter 340 Division 33, and LRAPA 43-015 and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, Recycling and Emissions Reduction.

G11. Permit Shield [OAR 340-28-2190]

- a. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
  - i. such applicable requirements are included and are specifically identified in the permit, or
  - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
  
- b. Nothing in this rule or in any federal operating permit shall alter or affect the following:
  - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of LRAPA);
  - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. the applicable requirements of the national acid rain program, consistent with section 408(a) of the FCAA; or
  - iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
  
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-28-2230(1)(h), or significant permit modification.

G12. Inspection and Entry [OAR 340-28-2160(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow LRAPA, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. enter upon the permittee's premises where LRAPA Title V operating permit program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;

- b. have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. as authorized by the FCAA or state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-28-2560, and 340-28-2580 through 340-28-2740]

The permittee shall pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under section 112(r) of the Federal Clean Air Act. The permittee shall submit payment to Lane Regional Air Pollution Authority, 1010 Main Street, Springfield, Oregon 97477, within 30 days of the date LRAPA mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes shall be submitted in writing to LRAPA. Payment shall be made regardless of the dispute. User-based fees shall be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-28-2220(2)]

- a. The permittee shall monitor for, and record, any off-permit change to the source that:
  - i. is not addressed or prohibited by the permit;
  - ii. is not a Title I modification;
  - iii. is not subject to any requirements under Title IV of the FCAA;
  - iv. meets all applicable requirements;
  - v. does not violate any existing permit term or condition; and
  - vi. may result in emissions of regulated air

pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-28-110.

- b. A contemporaneous notification, if required under OAR 340-28-2220(2)(b), shall be submitted to LRAPA and the EPA.
- c. The permittee shall keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 shall not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-28-2220(3)]

- a. The permittee shall monitor for, and record, any section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
  - i. violate an applicable requirement;
  - ii. contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
  - iii. be a Title I modification.
- b. A minimum 7-day advance notification shall be submitted to LRAPA and the EPA in accordance with OAR 340-28-2220(3)(b).
- c. The permit shield of Condition G11 shall not extend to section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-28-2230]

Administrative amendments to this permit shall be requested and granted in accordance with OAR 340-28-2230. The permittee shall promptly submit an application for the following types of administrative amendments upon becoming

aware of the need for one, but no later than 60 days of such event:

- a. legal change of the registered name of the company with the Corporations Division of the State of Oregon, or
- b. sale or exchange of the activity or facility.

G17. Minor Permit Modification [OAR 340-28-2250]

The permittee shall submit an application for a minor permit modification in accordance with OAR 340-28-2250.

G18. Significant Permit Modification [OAR 340-28-2260]

The permittee shall submit an application for a significant permit modification in accordance with OAR 340-28-2260

G19. Construction/Operation Modification [OAR 340-28-2270]

No permittee shall construct or make modifications required to be reviewed under OAR 340-28-2270, the construction/operation modification rule, without receiving a Notice of Approval in accordance with OAR 340-28-2270. The permittee should allow 60 days for LRAPA review of applications for a construction/operation modification if public notice is not required, or 180 days if public notice is required.

G20. New Source Review Modification [OAR 340-28-1900]

No permittee shall construct or make modifications required to be reviewed under New Source Review (OAR 340-28-1900(1)) without receiving an Air Contaminant Discharge Permit (ACDP) (OAR 340-28-1700). The permittee should allow 180 days for LRAPA review of an ACDP application for New Source Review.

G21. Hazardous Air Pollutant Modification for Non-major HAP Sources [OAR 340-32-230 and LRAPA (state/LRAPA-only enforceable)]

No permittee shall make a physical change in or change in the method of operation of a non-major HAP source that results in an increase in the potential to emit so that the major source threshold (i.e., 10 tons of an individual HAP or 25 tons of aggregate HAPs) is exceeded, without first obtaining a Notice of Approval in accordance with OAR 340-28-2270. The permittee should allow 180 days for LRAPA review of applications for construction/operation

modifications and issuance of a Notice of Approval.

G22. Need to Halt or Reduce Activity Not a Defense [OAR 340-28-2130(6)(b)]

It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

G23. Duty to Provide Information [OAR 340-28-2130(6)(e) and OAR 340-28-300]

The permittee shall furnish to LRAPA, within a reasonable time, any information that LRAPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to LRAPA copies of records required to be retained by the permit.

G24. Reopening for Cause [OAR 340-28-2130(6)(c) and 340-28-2280]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
- b. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- c. A permit shall be reopened and revised under any of the circumstances listed in OAR 340-28-2280(1)(a).
- d. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

G25. Severability Clause [OAR 340-28-2130(5)]

Upon any administrative or judicial challenge, all the emission limits, specific and general conditions, monitoring, recordkeeping, and reporting requirements of this permit, except those being challenged, remain valid and must be complied with.

G26. Permit Renewal and Expiration [OAR 340-28-2120(1)(a)(D) and 340-28-2210]

- a. This permit shall expire at the end of its term. Permit expiration terminates the permittee's right to operate unless a timely and complete renewal application is submitted as described below.
- b. Applications for renewal shall be submitted at least 12 months before the expiration of this permit, unless LRAPA requests an earlier submittal. If more than 12 months is required to process a permit renewal application, LRAPA shall provide no less than six (6) months for the owner or operator to prepare an application. Provided the permittee submits a timely and complete renewal application, this permit shall remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. Permit Transference [OAR 340-28-2230(1)(d)]

The permit is not transferrable to any person except as provided in OAR 340-28-2230(1)(d).

G28. Property Rights [OAR 340-28-110(9)(c) and 340-28-2130(6)(d)]

The 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, except as provided in OAR 340-28-2190.

G29. Permit Availability [OAR 340-28-110(9)(c) and 340-28-2200(2)]

The permittee shall have available at the facility at all times a copy of the LRAPA Title V Operating Permit and shall provide a copy of the permit to LRAPA or an authorized representative upon request.

G30. Credible Evidence

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-028-0310]

**ALL INQUIRIES SHOULD BE DIRECTED TO:**

Lane Regional Air Pollution Authority  
1010 Main Street  
Springfield, Oregon 97477  
Telephone: (541) 736-1056

srm/bp  
6/10/99