LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT

Lane Regional Air Protection Agency
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056 Toll Free: (877) 285-7272
Fax: (541) 726-1205 Web Page: www.lrapa.org

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

ISSUED TO:
Swanson Group Mfg. LLC
Springfield Plywood/Veneer
1651 South F Street
Springfield, Oregon 97477

INFORMATION RELIED UPON:
Agency-initiated Modification

PLANT SITE LOCATION:
1651 South F Street
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:
Issued by: City of Springfield
Dated: December 3, 2001

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director
Date: AUG - 6 2018

NATURE OF BUSINESS:
Veneer And Plywood/Panel Products Manufacturing
Fuel Burning Equipment (Boilers)

SIC:
2436
4961

RESPONSIBLE OFFICIALS:
Title: Vice President of Engineering
Phone: (541) 761-0533

FACILITY CONTACT PERSON:
Name: Jay Yates
Title: Corporate Boiler and Steam Manager
Phone: (541) 832-1412

ADDENDUM NO. 4
(Minor Permit Modification)

In accordance with OAR 340-218-0170(1)(a) and OAR 340-218-0200(1)(a)(D), Title V Operating Permit No. 207510 is hereby amended to update the VOC, methanol, and combined HAP emission factors for the Plywood Presses (EU-2) in Condition 54, Table 9 and Condition 56, Table 10 to reflect the results of the source test conducted on February 27, 2018.
Condition 54, Table 9. PSEL Emission Factors for EU-2 reads as follows with the revisions in **bold**:

<table>
<thead>
<tr>
<th>Emissions Unit(s)</th>
<th>Pollutant</th>
<th>Fuels/Species/ Conditions</th>
<th>Emission Factor</th>
<th>Emission Factor Units</th>
<th>Emission Factor Verification Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Plywood Presses (EU-2)</td>
<td>PM</td>
<td>NA</td>
<td>0.203</td>
<td>lb/MSF-3/8&quot; plywood</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>PM\textsubscript{10}</td>
<td>NA</td>
<td>0.196</td>
<td>lb/MSF-3/8&quot; plywood</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>PM\textsubscript{2.5}</td>
<td>NA</td>
<td>0.098</td>
<td>lb/MSF-3/8&quot; plywood</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>NA</td>
<td><strong>0.252</strong></td>
<td>lb/MSF-3/8&quot; plywood</td>
<td>Yes/No</td>
</tr>
</tbody>
</table>

Condition 56, Table 10. HAP Emission Factors for Determining Synthetic Minor HAP Compliance reads as follows with the revisions in **bold**:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Process/Device</th>
<th>Emission Factor</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Methanol (c)</td>
<td>Boilers</td>
<td>9.92E-04</td>
<td>lb/Mlb steam</td>
</tr>
<tr>
<td></td>
<td>Plywood Presses (a)</td>
<td><strong>1.01E-01</strong></td>
<td>lb/MSF-3/8&quot; plywood</td>
</tr>
<tr>
<td></td>
<td>Veneer Dryers</td>
<td>6.56E-03</td>
<td>lb/MSF-3/8&quot; veneer</td>
</tr>
<tr>
<td>Combined HAP</td>
<td>Boilers</td>
<td>8.96E-03</td>
<td>lb/Mlb steam</td>
</tr>
<tr>
<td></td>
<td>Plywood Presses (b)</td>
<td><strong>1.39E-01</strong></td>
<td>lb/MSF-3/8&quot; plywood</td>
</tr>
<tr>
<td></td>
<td>Veneer Dryers</td>
<td>2.71E-02</td>
<td>lb/MSF-3/8&quot; veneer</td>
</tr>
</tbody>
</table>

KE/CMW
08/03/2018
LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT

Lane Regional Air Protection Agency
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056 Toll Free: (877) 285-7272
Fax: (541) 726-1205 Web Page: www.lrapa.org

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

ISSUED TO:
Swanson Group Mfg. LLC
Springfield Plywood/Veneer
1651 South F Street
Springfield, Oregon 97477

INFORMATION RELIED UPON:
Agency-initiated Modification

PLANT SITE LOCATION:
1651 South F Street
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:
Issued by: City of Springfield
Dated: December 3, 2001

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

[Signature]
Marilyn L. Hough, Director

[Signature]
June 21, 2018
Date

NATURE OF BUSINESS:
Veneer And Plywood/Panel Products Manufacturing
Fuel Burning Equipment (Boilers)

SIC:
2436
4961

RESPONSIBLE OFFICIALS:
Title: Vice President of Engineering
Phone: (541) 761-0533

FACILITY CONTACT PERSON:
Name: Jay Yates
Title: Corporate Boiler and Steam Manager
Phone: (541) 832-1412

ADDENDUM NO. 3
(Significant Permit Modification)

In accordance with OAR 340-218-0180(1)(a) and OAR 340-218-0200(1)(a)(C), Title V Operating Permit No. 207510 is hereby amended to update the PM_{2.5} PSEL in Condition 53, Table 7 to 74 tons/year to reflect the correction of a PM_{2.5} PSEL calculation error that utilized an artificially low PM_{2.5} emission factor for the Veneer Dryers (EU-3).
Condition 53, Table 7 reads as follows with the revisions in **bold**:

**Table 7. Annual Plant Site Emission Limits**

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Netting Basis (ton/year)</th>
<th>Components of the PSEL</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>PSEL (tons/year)</td>
<td>Unassigned Emissions (tons/year)</td>
</tr>
<tr>
<td>PM</td>
<td>152</td>
<td>176</td>
<td>0</td>
</tr>
<tr>
<td>PM(_{10})</td>
<td>110</td>
<td>124</td>
<td>0</td>
</tr>
<tr>
<td>PM(_{2.5})</td>
<td>65</td>
<td>74</td>
<td>0</td>
</tr>
<tr>
<td>CO</td>
<td>62</td>
<td>161</td>
<td>0</td>
</tr>
<tr>
<td>NO(_X)</td>
<td>81</td>
<td>89</td>
<td>0</td>
</tr>
<tr>
<td>SO(_2)</td>
<td>3</td>
<td>39</td>
<td>0</td>
</tr>
<tr>
<td>VOC</td>
<td>104</td>
<td>80</td>
<td>24</td>
</tr>
<tr>
<td>GHG</td>
<td>56,665</td>
<td>74,000</td>
<td>0</td>
</tr>
</tbody>
</table>

In accordance with OAR 340-218-0170(1)(a), Title V Operating Permit No. 207510 is hereby amended to update the PM\(_{10}\) and PM\(_{2.5}\) emission factors for the Boilers (EU-1) in Condition 54, Table 9 to reflect corrected PM/PM\(_{10}\) and PM\(_{10}\)/PM\(_{2.5}\) fractions.

Condition 54, Table 9 [table includes only the rows for the PM, PM\(_{10}\), and PM\(_{2.5}\) emission factors for EU-1] reads as follows with the revisions in **bold**:

**Table 9. PSEL Emission Factors**

<table>
<thead>
<tr>
<th>Emissions Unit(s)</th>
<th>Pollutant</th>
<th>Fuels/Species/Conditions</th>
<th>Emission Factor</th>
<th>Emission Factor Units</th>
<th>Emission Factor Verification Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Yes/No</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td></td>
<td></td>
<td>Test Method</td>
</tr>
<tr>
<td>Boilers (EU-1)</td>
<td>PM</td>
<td>Hogged fuel</td>
<td>0.574 (Boiler 1)</td>
<td>lb/M lb steam</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.465 (Boiler 2)</td>
<td></td>
<td>ODEQ Method 5</td>
</tr>
<tr>
<td></td>
<td>PM(_{10})</td>
<td>Hogged fuel</td>
<td>0.545 (Boiler 1)</td>
<td>lb/M lb steam</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.441 (Boiler 2)</td>
<td></td>
<td>ODEQ Method 5</td>
</tr>
<tr>
<td></td>
<td>PM(_{2.5})</td>
<td>Hogged fuel</td>
<td>0.327 (Boiler 1)</td>
<td>lb/M lb steam</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.265 (Boiler 2)</td>
<td></td>
<td>NA</td>
</tr>
</tbody>
</table>

KE/CMW
05/09/2018
LANE REGIONAL AIR PROTECTION AGENCY  
TITLE V OPERATING PERMIT

Lane Regional Air Protection Agency  
1010 Main Street, Springfield, Oregon  97477  

Telephone: (541) 736-1056  
Fax: (541) 726-1205  
Toll Free: (877) 285-7272  
Web Page: www.lrapa.org

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

ISSUED TO:  
Swanson Group Mfg. LLC  
Springfield Plywood/Veneer  
1651 South F Street  
Springfield, Oregon  97477

INFORMATION RELIED UPON:  
Application Number: 63330  
Received: November 15, 2017

PLANT SITE LOCATION:  
1651 South F Street  
Springfield, Oregon 97477  

LAND USE COMPATIBILITY STATEMENT:  
Issued by: City of Springfield  
Dated: December 3, 2001

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director  
Date: January 4, 2018

NATURE OF BUSINESS:  
Veneer And Plywood/Panel Products Manufacturing  
Fuel Burning Equipment (Boilers)

SIC:  
2436  
4961

RESPONSIBLE OFFICIALS:  
Title: Vice President of Engineering  
Phone: (541) 761-0533

FACILITY CONTACT PERSON:  
Name: Jay Yates  
Title: Corporate Boiler and Steam Manager  
Phone: (541) 832-1412

ADDENDUM NO. 2  
(Minor Permit Modification)

In accordance with OAR 340-218-0170(1)(a), Title V Operating Permit No. 207510 is hereby amended to update the PM, PM$_{10}$, PM$_{2.5}$, VOC, methanol and combined HAP emission factors for the Veneer Dryers (EU-3) in Condition 54 Table 9 and Condition 56 Table 10 to reflect the results of the source test conducted on November 9, 2016.
Condition 54, Table 9. PSEL Emission Factors for EU-3 now reads:

<table>
<thead>
<tr>
<th>Emissions Unit(s)</th>
<th>Pollutant</th>
<th>Fuels/Species/ Conditions</th>
<th>Emission Factor</th>
<th>Emission Factor Units</th>
<th>Emission Factor Verification Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Veneer Dryers with RTO (EU-3)</td>
<td>PM</td>
<td>Douglas Fir</td>
<td>0.015</td>
<td>lb/MSF-3/8” veneer</td>
<td>Yes</td>
</tr>
<tr>
<td></td>
<td>PM10</td>
<td>Douglas Fir</td>
<td>0.015</td>
<td>lb/MSF-3/8” veneer</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>PM2.5</td>
<td>Douglas Fir</td>
<td>0.015</td>
<td>lb/MSF-3/8” veneer</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>PM/PM10</td>
<td>Douglas Fir</td>
<td>7.5E-03</td>
<td>lb/MSF-3/8” veneer</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>Natural Gas (RTO)</td>
<td>0.7486</td>
<td>lb/hr</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>NOx</td>
<td>Natural Gas (RTO)</td>
<td>0.234</td>
<td>lb/hr</td>
<td>No</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>Douglas Fir</td>
<td>0.028 (Dryers)</td>
<td>lb/MSF-3/8” veneer</td>
<td>Yes (Dryers)</td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.0286 (Cooling Sections)</td>
<td></td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td></td>
<td>0.0026 (Fugitives)</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

Table 10. HAP Emission Factors for Determining Synthetic Minor HAP Compliance now reads:

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Process/Device</th>
<th>Emission Factor</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Methanol (c)</td>
<td>Boilers</td>
<td>9.92E-04</td>
<td>lb/Mlb steam</td>
</tr>
<tr>
<td></td>
<td>Plywood Presses (a)</td>
<td>5.40E-02</td>
<td>lb/Msf -3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>Veneer Dryers</td>
<td>6.56E-03</td>
<td>lb/Msf -3/8” veneer</td>
</tr>
<tr>
<td>Combined HAP</td>
<td>Boilers</td>
<td>8.96E-03</td>
<td>lb/Mlb steam</td>
</tr>
<tr>
<td></td>
<td>Plywood Presses (b)</td>
<td>0.087</td>
<td>lb/Msf -3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>Veneer Dryers</td>
<td>2.71E-02</td>
<td>lb/Msf -3/8” veneer</td>
</tr>
</tbody>
</table>

In accordance with OAR 340-218-0050(3)(c)(A), Title V Operating Permit No. 207510 is hereby amended to change the submittal date of the first semi-annual report from July 30 to August 15 to better align with the production tracking system at the facility and to coincide with the semi-annual reporting dates at two other Title V facilities owned and operated by Swanson Group Mfg. LLC.

Condition 60.a. now reads:

60.a. The first semi-annual report shall be received by August 15 and shall include the semi-annual compliance certification. [OAR 340-218-0080]

KE/cmw
1/4/2018
LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT

Lane Regional Air Protection Agency
1010 Main Street, Springfield, Oregon 97477
Telephone: (541) 736-1056 Toll Free: (877) 285-7272
Fax: (541) 726-1205 Web Page: www.trapa.org

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

ISSUED TO:
Swanson Group Mfg. LLC
Springfield Plywood/Veneer
1651 South F Street
Springfield, Oregon 97477

INFORMATION RELIED UPON:
Application Number: 62849
Received: May 11, 2017

PLANT SITE LOCATION:
1651 South F Street
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:
Issued by: City of Springfield
Dated: December 3, 2001

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

NATURE OF BUSINESS:
Veneer And Plywood/Panel Products Manufacturing
Fuel Burning Equipment (Boilers)

SIC:
2436
4961

RESPONSIBLE OFFICIALS:
Title: Vice President of Engineering
Phone: (541) 761-0533

FACILITY CONTACT PERSON:
Name: Jay Yates
Title: Corporate Boiler and Steam Manager
Phone: (541) 832-1412

ADDENDUM NO. 1
(Administrative Amendment)

In accordance with OAR 340-218-0150(1)(b), Title V Operating Permit No. 207510 is hereby amended to change
the “Responsible Officials” on Page 1 to read as follows:

“Titles: Vice President of Engineering”
In accordance with OAR 340-218-0150(1)(f), Title V Operating Permit No. 207510 is hereby amended to change the date of the source test requirement for the Plywood Presses from no later than December 31, 2016, to no later than March 31, 2018, based on the incomplete installation and delayed start-up of the Plywood Presses at the facility.

Condition 56.c. now reads:

56.c. By no later than March 31, 2018, the permittee shall perform source tests at the compliance demonstration points for emission unit Plywood Presses to evaluate the HAP emission factors.

KE/CMW
6/22/2017
LANE REGIONAL AIR PROTECTION AGENCY  
TITLE V OPERATING PERMIT  

Lane Regional Air Protection Agency  
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Toll Free: (877) 285-7272  
Web Page: www.lrapa.org  

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

<table>
<thead>
<tr>
<th>ISSUED TO:</th>
<th>INFORMATION RELIED UPON:</th>
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<tbody>
<tr>
<td>Swanson Group Mfg. LLC</td>
<td></td>
</tr>
<tr>
<td></td>
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<tr>
<td>Springfield Plywood/Veneer</td>
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<tr>
<td>1651 South F Street</td>
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</tr>
<tr>
<td>Springfield, Oregon 97477</td>
<td></td>
</tr>
<tr>
<td>Application Number: 59546, 60677, 60696</td>
<td></td>
</tr>
<tr>
<td>Received: 06/26/15, 08/18/15, 08/27/15</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>PLANT SITE LOCATION:</th>
<th>LAND USE COMPATIBILITY STATEMENT:</th>
</tr>
</thead>
<tbody>
<tr>
<td>1651 South F Street</td>
<td></td>
</tr>
<tr>
<td>Springfield, Oregon 97477</td>
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<tr>
<td>Issued by: City of Springfield</td>
<td></td>
</tr>
<tr>
<td>Dated: December 3, 2001</td>
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</tr>
</tbody>
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<table>
<thead>
<tr>
<th>ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY</th>
</tr>
</thead>
<tbody>
<tr>
<td>Merlyn L. Hough, Director</td>
</tr>
<tr>
<td>Date</td>
</tr>
<tr>
<td>FEB 26 2016</td>
</tr>
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</table>

<table>
<thead>
<tr>
<th>NATURE OF BUSINESS:</th>
<th>SIC:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Veneer And Plywood/Panel Products Manufacturing</td>
<td></td>
</tr>
<tr>
<td>Fuel Burning Equipment (Boilers)</td>
<td></td>
</tr>
<tr>
<td>2436</td>
<td></td>
</tr>
<tr>
<td>4961</td>
<td></td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>RESPONSIBLE OFFICIALS:</th>
<th>FACILITY CONTACT PERSON:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Title: Vice President of Manufacturing</td>
<td></td>
</tr>
<tr>
<td>Phone: (541) 761-0533</td>
<td></td>
</tr>
<tr>
<td>Name: Jay Yates</td>
<td></td>
</tr>
<tr>
<td>Title: Corporate Boiler and Steam Manager</td>
<td></td>
</tr>
<tr>
<td>Phone: (541) 832-1412</td>
<td></td>
</tr>
</tbody>
</table>

Renewal and  
Significant Permit Modification

In accordance with OAR 340-218-0180(1)(b), Title V Operating Permit No. 207510 is renewed and amended to revise the control device for the veneer dryers (EU-3) from wet scrubbers (GPS-1 and GPS-2) to a regenerative thermal oxidizer (RTO). The renewal and modification also includes updated emission factors based upon source testing on the boilers.
TABLE OF CONTENTS

LIST OF ABBREVIATIONS USED IN THIS PERMIT ................................................................. 3
PERMITTED ACTIVITIES ........................................................................................................ 4
EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION .......... 4
EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING
REQUIREMENTS ...................................................................................................................... 5
   Facility-Wide ...................................................................................................................... 5
   Boiler-1 and Boiler-2 ......................................................................................................... 7
   Plywood Presses ............................................................................................................... 14
   Veneer Dryers .................................................................................................................. 15
   Mill Equipment ............................................................................................................... 19
   Mill Equipment ............................................................................................................... 21
   Insignificant Activities ................................................................................................... 21
PLANT SITE EMISSION LIMITS ........................................................................................... 24
ANNUAL PLANT SITE EMISSION LIMITS .......................................................................... 24
GENERAL TESTING REQUIREMENTS ................................................................................. 29
GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS ................................. 29
REPORTING REQUIREMENTS ............................................................................................. 30
GENERAL CONDITIONS ..................................................................................................... 34
LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP  Air Contaminant Discharge Permit
Act   Federal Clean Air Act
ASTM  American Society of Testing and Materials
Btu   British thermal unit
CFR   Code of Federal Regulations
CO    Carbon Monoxide
CPMS  Continuous parameter monitoring system
DEQ   Department of Environmental Quality
dscf  Dry standard cubic feet
EF    Emission factor
EPA   US Environmental Protection Agency
EU    Emissions Unit
FCAA  Federal Clean Air Act
FSA   Fuel sampling and analysis
GHG   Greenhouse gases
gr/dscf Grain per dry standard cubic feet (1 pound = 7000 grains)
HAP   Hazardous Air Pollutant as defined by LRAPA Title 44
HCFC  Halogenated Chloro-Fluoro-Carbons
ID    Identification number
I&M   Inspection and maintenance
LRAPA Lane Regional Air Protection Agency
NA    Not applicable
NOx   Nitrogen oxides
O2    Oxygen
OAR   Oregon Administrative Rules
ODEQ  Oregon Department of Environmental Quality
ORS   Oregon Revised Statutes
O&M   Operation and maintenance
Pb    Lead
PCD   Pollution Control Device
PM    Particulate matter
PM10  Particulate matter less than 10 microns in size
PM2.5 Particulate matter less than 2.5 microns in size
ppm   Parts per million
PSEL  Plant Site Emission Limit
psia  pounds per square inch, actual
RICE  Reciprocating internal combustion engine
SERP  Source emissions reduction plan
SO2   Sulfur dioxide
ST    Source test
VE    Visible emissions
VMT   Vehicle miles traveled
VOC   Volatile organic compounds
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 340-218-0010 and 340-218-0120(2)]

2. All conditions in this permit are federally enforceable and state enforceable except Condition 6, G5 and G9, which are only enforceable by LRAPA. [OAR 340-218-0060]

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

3. The emissions units regulated by this permit are the following: [OAR 340-218-0040(3)]

<table>
<thead>
<tr>
<th>Emission Unit Description</th>
<th>EU ID</th>
<th>Pollution Control Device Description</th>
<th>PCD ID</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boilers</td>
<td>EU-1</td>
<td>Multicone</td>
<td>MC-1</td>
</tr>
<tr>
<td>Boiler-1 (B-1)</td>
<td></td>
<td>Multicone</td>
<td></td>
</tr>
<tr>
<td>Boiler-2 (B-2)</td>
<td></td>
<td></td>
<td>MC-2</td>
</tr>
<tr>
<td>Plywood Presses</td>
<td>EU-2</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Press #1 (P-1)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Press #2 (P-2)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Press #3 (P-3)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Press #4 (P-4)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Press #5 (P-5)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Veneer Dryers</td>
<td>EU-3</td>
<td>Regenerative Thermal Oxidizer</td>
<td>RTO</td>
</tr>
<tr>
<td>Veneer Dryer #1 (VD-1)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Veneer Dryer #2 (VD-2)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mill Equipment</td>
<td>EU-4</td>
<td>Cyclone #7/Baghouse #1</td>
<td>C-7/Bag-1</td>
</tr>
<tr>
<td>Core Saw, Strip Saw, Raute P-2</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Robot Plugger Line, Veneer Scarfer &amp; Edge Gluer, Panel Saw, Dry Hog, Composer Hog</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fines Target Box</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Panel Sanding Line</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Sander Dust Fuel Silo Bin Vent</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ply trim bin vent</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Cyclone #8 (C-8) (Hog Fuel Bin)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fugitive Sources</td>
<td>EU-5</td>
<td>None</td>
<td>None</td>
</tr>
<tr>
<td>Hog Fuel Pile (VOC only)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chippers/Hogs (VOC only)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Block Conditioning Vault (VOC only)</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Emission Unit Description</td>
<td>EU ID</td>
<td>Pollution Control Device Description</td>
<td>PCD ID</td>
</tr>
<tr>
<td>-----------------------------------</td>
<td>-------</td>
<td>--------------------------------------</td>
<td>--------</td>
</tr>
<tr>
<td>Material Handling (PM/PM10/PM2.5)</td>
<td></td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

**EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS**

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

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

<table>
<thead>
<tr>
<th>Applicable Requirement</th>
<th>Condition No.</th>
<th>Pollutant/Parameter</th>
<th>Limit/Standard</th>
<th>Monitoring Method</th>
<th>Monitoring Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>48-015-2</td>
<td>4</td>
<td>Fugitive Dust</td>
<td>Minimize Fugitive Dust Emissions</td>
<td>I&amp;M Recordkeeping</td>
<td>5</td>
</tr>
<tr>
<td>49-010</td>
<td>6.a</td>
<td>Odors &amp; Other Emissions</td>
<td>Nuisance/Odor</td>
<td>Recordkeeping</td>
<td>7</td>
</tr>
<tr>
<td>32-055</td>
<td>6.b</td>
<td>PM Fallout</td>
<td>&gt; 250 microns</td>
<td>I&amp;M Recordkeeping</td>
<td>7</td>
</tr>
<tr>
<td>40 CFR Part 68</td>
<td>8</td>
<td>Risk Management Plan</td>
<td>See Rule</td>
<td>Recordkeeping</td>
<td>NA</td>
</tr>
<tr>
<td>51-015</td>
<td>9</td>
<td>SERP</td>
<td>Reduce Emissions</td>
<td>Recordkeeping</td>
<td>10</td>
</tr>
<tr>
<td>33-030</td>
<td>11</td>
<td>Concealment &amp; Masking</td>
<td>Prohibited</td>
<td>I&amp;M Recordkeeping</td>
<td>12</td>
</tr>
<tr>
<td>33-060-3.B</td>
<td>13</td>
<td>PM</td>
<td>55.0 lb/hour</td>
<td>Once per 8-hour shift recordkeeping</td>
<td>14</td>
</tr>
</tbody>
</table>

4. **Applicable Requirement:** Fugitive Particulate Emissions [LRAPA 48-015-2]
   
   4.a. The permittee shall not allow or permit any materials to be handled, transported, or stored; or a building, its appurtenances, or a road 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.

5. **Monitoring and Recordkeeping Requirements:** Fugitive Particulate Emissions [OAR 340-208-0210]
   
   5.a. At least once each week for a minimum period of 30 minutes, the permittee shall visually survey the entire plant for any sources of fugitive emissions. For purposes of this condition, fugitive emissions are those fugitive emissions that may result in visible emissions leaving the plant site boundary for more than 18 seconds in a six-minute period. The person conducting the observation must follow the procedures of EPA Method 22.

5.b. If sources of fugitive particulate emissions are identified during the required visual survey or at any other time, the permittee shall immediately take corrective action to minimize the fugitive emissions or develop an LRAPA approved fugitive emission control plan upon request by LRAPA to implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
5.c. The permittee shall maintain a record of all fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 22 tests.

6. **Applicable Requirements**: Nuisance Conditions

6.a. The permittee shall not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010] This condition is enforceable only by LRAPA.

6.b. The permittee shall not cause or permit the deposition of any particulate matter that is larger than 250 microns in size at such duration and quantity, as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is enforceable only by LRAPA.

7. **Monitoring Requirement**: Nuisance Conditions

7.a. The permittee shall provide LRAPA with written notification within five days of all nuisance complaints received by the permittee during the operation of the facility, and shall maintain a log of each complaint. Documentation shall include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative shall immediately investigate the condition following the receipt of the nuisance complaint and a plant representative shall provide a response to the complainant within 24 hours, if possible. [OAR 340-218-0050(3)(a)]


8.a. Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10 and comply with the plan and all other applicable Part 68 requirements.

9. **Applicable Requirement**: Air Pollution Episodes

9.a. In the event an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee shall take 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.

10. **Monitoring and Recordkeeping Requirement**: Air Pollution Episodes

10.a. The permittee shall maintain records of all air pollution episodes and emission reduction actions taken. These records shall be maintained in a maintenance log or other appropriate written format.

11. **Applicable Requirement**: Concealment & Masking  [LRAPA 33-030]

11.a. 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 an applicable emission limit or standard.

12. **Monitoring and Recordkeeping Requirement**: Concealment & Masking

12.a. The permittee shall maintain records of all permit related documents and application materials pertaining to emissions of air contaminants.

13.a. The permittee shall not cause or allow the emission of PM from veneer and plywood mill equipment (EU-3 and EU-4) in excess of a total of 55.0 pounds per hour (8-hour average). [LRAPA 33-060-3.B]

14. **Monitoring and Recordkeeping Requirement:** Veneer and Plywood Rule

14.a. To demonstrate compliance with the emission limit specified in Condition 13, the permittee must maintain records once per 8-hour shift showing that the average amount of veneer dried during the 8-hour shift does not exceed 55,000 square feet/hour on 3/8” basis.

**BOILERS (EU-1)**

**Table 2. Boiler-1 and Boiler-2**

<table>
<thead>
<tr>
<th>Applicable Requirement</th>
<th>Condition No.</th>
<th>Pollutant/Parameter</th>
<th>Limit/Standard</th>
<th>Averaging Time</th>
<th>Testing Condition</th>
<th>Monitoring Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>OAR 340-208-0110</td>
<td>15</td>
<td>Visible Emissions</td>
<td>40% opacity through December 31, 2019; 20% opacity after January 1, 2020</td>
<td>6-minute block average</td>
<td>NA</td>
<td>16</td>
</tr>
<tr>
<td>OAR 340-228-0210</td>
<td>17</td>
<td>Grain Loading</td>
<td>0.24 gr/dscf through December 31, 2019; 0.15 gr/dscf after January 1, 2020</td>
<td>Hourly</td>
<td>18</td>
<td>18.g.ii</td>
</tr>
<tr>
<td>32-007-1</td>
<td>20</td>
<td>Operation and Maintenance</td>
<td>NA</td>
<td>Annually</td>
<td>NA</td>
<td>21</td>
</tr>
<tr>
<td>40 CFR Part 63, Subpart 6J (Area Source Boiler NESHAP)</td>
<td>22</td>
<td>HAP</td>
<td>Biennial Tune-up and Energy Assessment</td>
<td>NA</td>
<td>NA</td>
<td>23-25</td>
</tr>
</tbody>
</table>

15. **Applicable Requirement:** Visible Emissions Limit [OAR 340-208-0110]

15.a. Emissions from any wood-fired boiler installed, constructed, or modified before June 1, 1970 must not equal or exceed:

15.a.i. 40% opacity as a six-minute block average through December 31, 2019, with the exception that visible emissions may equal or exceed 40% opacity for up to two independent six-minute blocks in any hour, as long as the average opacity during each of these two six-minute blocks is less than 40%.

15.a.ii. 20% opacity as a six-minute block average on or after January 1, 2020, with one or more of the following exceptions:

15.a.ii.A. Visible emissions may equal or exceed 20% opacity for up to two independent six-minute blocks in any one hour, as long as the average opacity during each of these two six-minute blocks is less than 40%.

15.a.ii.B. Visible emissions may equal or exceed 20% opacity but may not equal or exceed 40% opacity as the average of all six-minute blocks
during grate cleaning operations provided the grate cleaning is performed in accordance with a grate cleaning plan approved by LRAPA. [OAR 340-208-0110(5)]

16. Monitoring and Recordkeeping Requirement(s): Visible Emissions Limit

16.a. The permittee shall monitor visible emissions from each boiler in accordance with the following procedures and frequencies:

16.a.i. The permittee shall conduct EPA Method 9 visible emissions tests monthly on each boiler stack. The visible emissions standards are based on the average of 24 consecutive observations recorded at 15-second intervals which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24.

16.a.ii. If an exceedance of the of the opacity limit specified in Condition 15 for either Boiler-1 or Boiler-2 occurs, the frequency of visible emissions observations for both boilers shall be increased to weekly until 6 consecutive weeks of operation show opacity less than the opacity limit specified in Condition 15, then the visible emissions testing frequency may revert back to a monthly schedule.

16.a.iii. In addition visible emissions observations shall be conducted during operating conditions including breakdown, upset, maintenance, and excursions of parametric monitoring requirements that may result in an emission limit exceedance.

16.a.iv. If the observer is unable to conduct the Method 9 visible emissions observation due to visual interference the observer shall note the conditions on the data observation sheet and repeat attempts to conduct the visible emissions observation at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.

16.b. All visible emissions observations shall be recorded in a log that includes the following information:

16.b.i. Name of observer,
16.b.ii. Date of observation(s),
16.b.iii. Time of observation(s),
16.b.iv. Operating conditions during observations (steam production rates, hog fuel feed rate, and sanderdust injection rate),
16.b.v. Results of observation(s),
16.b.vi. Weather conditions during observations, and
16.b.vii. Corrective actions taken, if applicable.

17. Applicable Requirement: Particulate Emissions (Combustion) [OAR 3340-228-0210]

17.a. The permittee shall not cause or allow the emission of particulate matter, for an hourly average, in excess of:

17.a.i. 0.24 grains per standard cubic foot, corrected to 12% CO2 or 50% excess air, from Boiler-1 or Boiler-2, prior to December 31, 2019; and

17.a.ii. 0.15 grains per standard cubic foot, corrected to 12% CO2 or 50% excess air, from Boiler-1 or Boiler-2, after January 1, 2020.

17.b. The permittee of Boiler-1 or Boiler-2 that is unable to comply with 0.15 grains per dry standard
cubic foot as specified in Condition 17.a.ii, may request a source specific limit of 0.17 grains per dry standard cubic foot after submitting an application for a permit modification to request the alternative limit by no later than October 1, 2019. The request must demonstrate, based on a signed report prepared by a registered professional engineer that specializes in boiler/multiclone operation, that the fuel burning equipment will be unable to comply with 0.15 grains per dry standard cubic foot corrected to 12% CO₂ or 50% excess air after maintenance or upgrades to the existing multiclone system.

18. **Testing Requirement**: Particulate Emissions (Combustion)

18.a. Within one (1) year prior to the expiration date of this permit, the permittee must demonstrate compliance with the emission limits specified in Condition 17 by conducting a source test for particulate matter at the compliance demonstration point of each boiler.

18.b. 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.

18.c. Oregon DEQ Method 5 and EPA Methods 1 through 4 shall be used for measuring particulate matter from the boilers. Each test run shall be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 dry standard cubic feet (dscf). Test results shall be reported as grains per dry standard cubic feet (gr/dscf), gr/dscf corrected to 12% CO₂, pounds per hour, and pounds per 1000 pounds of steam produced.

18.d. Each test shall be conducted while the boilers are operating at 90 to 110% of the maximum operating rate. For the purposes of this permit, the maximum operating rate is defined as the 90th percentile of all hourly operating rates during the 12-month period immediately preceding the source test. Boiler operation shall be determined using pounds of steam per hour (lb-steam/hr). 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 2 valid test runs for a source test to be accepted.

18.e. Only regular operating staff may adjust the process or emission control device parameters during a compliance test and within two (2) hours prior to the test. 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.

18.f. A report, which includes the results of the source test, shall be submitted to LRAPA for review and approval within 60 days of completing the source test, unless otherwise approved by LRAPA.

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

18.g.i. Visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 5 test run, unless weather conditions are such that it is not possible to read opacity;

18.g.ii. Boiler steam production rates (lb/hr);

18.g.iii. Excess boiler oxygen (%);

18.g.iv. Pressure drop across the multiclones during testing; and

18.g.v. Estimated percentage by weight of sanderdust and hogged fuel combusted.

19. **Monitoring Requirements**: Particulate Emissions (Combustion)

19.a. The permittee shall install, calibrate, maintain, operate, and record the output of a continuous monitoring system for measuring the excess oxygen from each boiler.

19.b. Real-time data shall be displayed at least once each minute that each boiler is in operation. Hourly averages of the data shall be recorded at the end of each clock-hour that each boiler is in operation...
and to determine a valid hourly average a minimum of 50 percent of the data points collected during the hour must be valid. Minimum data availability of the hourly averages shall be 90% for each month and year. Monitor availability shall be determined excluding periods of calibration and routine maintenance. **Recordkeeping:** The permittee must maintain records of data availability.

19.c. Anytime the excess oxygen level is less than 3 percent, the permittee shall perform corrective actions to return the boiler(s) to the approved operating level. **Recordkeeping:** The permittee must maintain records of periods of excess oxygen excursions and corrective actions taken.

19.d. In the event that the permittee has not operated a boiler for the six (6) months immediately preceding a source test required by this condition, testing of the idled boiler is not required. However, upon start-up of a boiler that is not tested due to non-operative status, the permittee must conduct testing as specified in Condition 18 within six (6) months of start-up.

20. **Applicable Requirement:** Operation and Maintenance Requirements [LRAPA 32-007-1]

20.a. The permittee shall operate, inspect and monitor the multiclones to ensure emission reduction at the highest reasonable efficiency and effectiveness.

21. **Monitoring and Recordkeeping Requirements:** Operation and Maintenance Requirements [LRAPA 32-007-2] and [40 CFR Part 64]

21.a. The permittee shall inspect multiclones annually, or during each boiler shutdown, whichever is sooner for signs of physical degradation that could affect performance of the control device. Any necessary repair or maintenance shall be performed prior to re-starting boilers.

21.b. Results of all multiclone inspection, maintenance and repair shall be documented in an operating log.

21.c. The permittee shall install, calibrate, maintain, operate, and record the output of a pressure gauge for measuring the pressure drop across each multiclone control device.

21.c.i. The permittee shall record pressure drop across multiclones daily.

21.c.ii. The permittee shall perform corrective action anytime the hourly average pressure drop is less than 1 inch of water column or greater than 6 inches of water column.

21.c.iii. If, within three hours a pressure drop excursion, corrective action cannot be initiated or is deemed ineffective, the permittee shall perform an EPA Method 9 test and notify LRAPA of the excursion and report the results of the EPA Method 9 test. Notification shall be within four hours of the excursion.

21.c.iv. The permittee shall record all pressure drop excursions, the corrective action taken, and the results of any EPA Method 9 tests conducted.

21.c.v. The permittee shall report the number of pressure of pressure drop excursions that occurred during the reporting period in the semi-annual monitoring report required by Condition 60.

21.c.vi. The pressure drop gauge shall be operated in accordance with the manufacturer's written instructions. At a minimum, the gauge shall be calibrated with a water-filled manometer once per year.

21.c.vii. If the pressure is fluctuating by more than 1 inch of water column when taking the daily readings, the permittee shall record the average of three readings during a one-minute period.

21.c.viii. Pressure drop monitoring is not required when the boiler is not operating.

**Area Source Boiler NESHAP (40 CFR 63 Subpart JJJJJJ):**
22. **Applicability, Compliance Dates and Fuel Limitation:** The requirements of 40 CFR Part 63, Subpart JJJJJ are incorporated by reference, as applicable. The NESHAP/MACT Standard for Industrial, Commercial and Institutional Boilers – Boiler Area Source MACT applies to the boilers in EU-1 because the boilers combust biomass and are both rated at greater than 10 MMBtu/hr heat input. The permittee may only burn wood biomass that has not been discarded and meets the legitimacy criteria specified in paragraph 40 CFR 241.3(d)(1). Biomass means any biomass-based solid fuel that is not a solid waste as defined in paragraph 40 CFR 241.3, as applicable. [40 CFR 63.11196(c)]

22.a. The permittee must achieve compliance with the initial tune up requirement in Condition 23 no later than March 21, 2014. In accordance with 40 CFR 63.1125(a)(4) the permittee must submit a signed statement in the Notice of Compliance Status report that indicates the tune-up of the boiler has been conducted. [40 CFR 63.11196(a)(1) and 40 CFR 63.11214(b)]

22.b. The permittee must achieve compliance with the energy assessment requirement in Table 2 of the NESHAP no later than March 21, 2014. In accordance with 40 CFR 63.1125(a)(4) the permittee must submit a signed certification in the Notice of Compliance Status report that an energy assessment of the boiler and its energy use systems was completed according to Table 2 of 40 CFR 63 Subpart JJJJJ. [40 CFR 63.11196(a)(3) and 40 CFR 63.11214(c)]

23. **EU-1 Boiler Tune-Up Requirements:** The permittee must conduct a performance tune-up biennially as follows. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up: [40 CFR 63.11196(a)(1), 63.11201(b), 63.11214(b) and 63.11223(b)]

23.a. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (you may delay the burner inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection). Units that produce electricity for sale may delay the burner inspection until the first outage, not to exceed 36 months from the previous inspection.

23.b. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. Any adjustment must be consistent with the manufacturer’s specifications for the burner, if available.

23.c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown, not to exceed 36 months from the previous inspection).

23.d. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any nitrogen oxide requirement to which the unit is subject.

23.e. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer.

23.f. Maintain on-site and submit, if requested by the Administrator, a report containing the information as follows:

23.f.i. The concentrations of CO in the effluent stream in parts per million, by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler.

23.f.ii. A description of any corrective actions taken as a part of the tune-up of the boiler.
23.f.iii. The type and amount of fuel used over the 12 months prior to the tune-up of the boiler, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel use by each unit.

23.g. If the unit is not operating on the required date for a tune-up, the tune-up must be conducted within 30 days of startup.

24. **Recordkeeping:** The permittee must maintain the following records: [40 CFR 63.11225(c)]

24.a. As required in §63.10(b)(2)(xv), the permittee must keep a copy of each notification and report that you submitted to comply with 40 CFR Subpart JJJJJ and all documentation supporting any Initial Notification or Notification of Compliance Status that is submitted.

24.b. The permittee must keep records to document conformance with the work practices and management practices required by §63.11214 and §63.11223 as follows:

24.b.i. Records must identify each boiler, the date of tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.

24.b.ii. For operating units that combust non-hazardous secondary materials that have been determined not to be solid waste pursuant to 40 CFR §241.3(b)(1), the permittee must keep a record which documents how the secondary material meets each of the legitimacy criteria under §241.3(d)(1). If the permittee combusts a fuel that has been processed from a discarded non-hazardous secondary material pursuant to §241.3(b)(4), the permittee must keep records as to how the operations that produced the fuel satisfies the definition of processing in §241.2 and each of the legitimacy criteria in §241.3(d)(1). If the fuel received a non-waste determination pursuant to the petition process submitted under §241.3(c) of this chapter, the permittee must keep a record that documents how the fuel satisfies the requirements of the petition process. For operating units that combust non-hazardous secondary materials as fuel per §241.4, the permittee must keep records documenting that the material is a listed non-waste under §241.4(a).

24.b.iii. For each boiler required to conduct an energy assessment, the permittee must keep a copy of the energy assessment report.

24.c. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in §63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.

24.d. Records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years.

25. **Ongoing Reporting and General Provision Requirements:** The permittee must comply with the following, as applicable:

25.a. The permittee must prepare a biennial compliance report and include it with the appropriate annual report specified in Condition 60.b.iii. The report must include the following: [40 CFR
63.11225(b)]

25.a.i. Company name and address;

25.a.ii. Statement by a responsible official, with the official’s name, title, phone number, e-mail address, and signature, certifying the truth accuracy and completeness of the notification and a statement of whether the source has complied with all of the relevant standards and other requirements of 40 CFR Part 63, subpart JJJJJJ.

25.a.iii. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of the deviations, the time periods during which the deviations occurred, and the corrective action taken.

25.b. 40 CFR Part 63 General Provisions according to Table 8 of 40 CFR 63 Subpart JJJJJJ, incorporated by reference. [40 CFR 63.11235]

25.c. The general compliance requirements specified in 40 CFR 63.11205 are incorporated by reference, except 40 CFR 63.11205 (b) and (c) are not applicable.
Table 3. Plywood Presses

<table>
<thead>
<tr>
<th>Applicable Requirement</th>
<th>Condition No.</th>
<th>Pollutant/ Parameter</th>
<th>Limit/Standard</th>
<th>Averaging Time</th>
<th>Testing Condition</th>
<th>Monitoring Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>340-208-0110</td>
<td>26</td>
<td>Visible Emissions</td>
<td>20% opacity</td>
<td>6-minute block average</td>
<td>27</td>
<td>28</td>
</tr>
<tr>
<td>340-226-0210</td>
<td>29</td>
<td>Particulate Matter</td>
<td>0.10 gr/dscf</td>
<td>Average of 3 one-hour tests</td>
<td>30</td>
<td>31</td>
</tr>
</tbody>
</table>

26. **Applicable Requirement:** Visible Emissions [OAR 340-208-0110]

26.a. The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from the plywood presses to equal or exceed 20% opacity as a six-minute block average.

27. **Testing Requirement:** Visible Emissions

27.a. Visible emissions shall be determined using EPA Method 9, in accordance with ODEQ's Source Sampling Manual. The visible emissions standards are based on the average of 24 consecutive observations recorded at 15-second intervals which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24.

28. **Monitoring and Recordkeeping:** Visible Emissions

28.a. The permittee shall monitor visible emissions from each press vent in accordance with the following procedures and frequencies:

28.a.i. The permittee shall conduct an EPA Method 9 visible emissions observation at least once per calendar quarter at each plywood press vent.

28.a.ii. All visible emissions observations shall be conducted during operating conditions that have the potential to create visible emissions.

28.a.iii. If the observer is unable to conduct the EPA Method 9 visible emissions observation due to visual interference the observer shall note the conditions on the data observation sheet and repeat attempts to conduct the visible emissions observation at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.

28.b. All visible emissions observations shall be recorded in a log that includes the following information:

28.b.i. Name of observer,
28.b.ii. Date of observation(s),
28.b.iii. Time of observation(s),
28.b.iv. Operating conditions during observations (press cycle time, board thickness, ply number, press temperature),
28.b.v. Results of observation(s), and
28.b.vi. Weather conditions during observations.
29. **Applicable Requirement:** Particulate Matter (0.10 gr/dscf) [OAR 340-226-0210]

   29.a. The permittee shall not cause or allow the emission of particulate matter in excess of 0.10 grains per dry standard cubic foot from any process device identified in emissions unit EU-2.

30. **Testing Requirement:** Particulate Matter (0.10 gr/dscf)

   30.a. There are no testing requirements for this applicable requirement. If source testing is conducted in addition to the monitoring specified in this permit, the permittee shall comply with testing requirements specified in Condition 57 and use the following test methods and averaging times to measure the pollutant emissions:

   30.a.i. Test method: ODEQ Method 5.

   30.a.ii. Averaging Time: average of three (3) one-hour test runs.

31. **Monitoring and Recordkeeping Requirement:** Particulate Matter (0.10 gr/dscf)

   31.a. The permittee shall conduct visible emissions monitoring in accordance with Conditions 27 and 28.

**VENeer DRYERS (EU-3)**

**Table 4. Veneer Dryers**

<table>
<thead>
<tr>
<th>Applicable Requirement</th>
<th>Condition No.</th>
<th>Pollutant/Parameter</th>
<th>Limit/Standard</th>
<th>Averaging Time</th>
<th>Testing Condition</th>
<th>Monitoring Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>33-060-3.A(2)</td>
<td>32</td>
<td>Visible Emissions</td>
<td>10% average opacity; 20% maximum opacity</td>
<td>6 min. average; 10% Average: 3 days within a 12-month period separated by at least 30 days; 20% Maximum: an average of 24 consecutive observations</td>
<td>33</td>
<td>34</td>
</tr>
<tr>
<td>340-226-0210</td>
<td>35</td>
<td>Particulate Matter</td>
<td>0.10 gr/dscf</td>
<td>Average of 3 one-hour tests</td>
<td>36</td>
<td>37</td>
</tr>
<tr>
<td>33-060-3.A(5)</td>
<td>38</td>
<td>Highest and Best Control</td>
<td>At least 90% VOC destruction; Operation and Maintenance</td>
<td>NA</td>
<td>36</td>
<td>39</td>
</tr>
</tbody>
</table>

32. **Applicable Requirement:** Visible Emissions (Dryers) [LRAPA 33-060-3.A(2)]

   32.a. The permittee shall not cause or allow the operation of a veneer dryer such that visible air contaminants emitted from the dryer stack or emission point exceed an average operating opacity of 10% or a maximum opacity of 20%.

   “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 33-060(1)(A)]

“Maximum opacity” means the opacity as determined using EPA Method 9 (average of 24 consecutive observations).

33. **Testing Requirement:** Visible Emissions (Dryers)

33.a. Visible emissions shall be measured in accordance with EPA Method 9.

34. **Monitoring and Recordkeeping Requirements:** Visible Emissions (Dryers).

34.a. Visible emissions testing shall be conducted monthly at the exhaust stack of the RTO and shall be conducted at least hourly during any and every thermal “bake-out” of the RTO. If an exceedance of the opacity limit occurs outside of a thermal bake-out event, the frequency of visible emissions tests shall be increased to weekly until 6 consecutive weeks of operation show opacity less than the 10% limit, then the visible emissions testing frequency may revert back to a monthly schedule.

34.b. In addition visible emissions observations shall be conducted during operating conditions including breakdown, upset, maintenance, and excursions of parametric monitoring requirements that may result in an emission limit exceedance.

34.c. If the observer is unable to conduct the visible emissions test due to visual interference 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 throughout the day. The permittee shall attempt to make the observations daily until a valid observation is completed.

34.d. All visible emissions observations shall be recorded in a log that includes the following information:

34.d.i. Name of observer,
34.d.ii. Date of observation(s),
34.d.iii. Time of observation(s),
34.d.iv. Operating conditions during observations (production rates, species of veneer dried, amount of veneer dried (1000 sqft/hr on a 3/8” basis), amount of redry, dryer conditions including dryer temperatures by zone and drying time, and RTO combustion chamber temperatures),
34.d.v. Results of observation(s), and
34.d.vi. Weather conditions during observations

35. **Applicable Requirement:** Particulate Matter (0.10 gr/dscf) [OAR 340-226-0210]

35.a. The permittee shall not cause or allow the emission of particulate matter in excess of 0.10 grains per dry standard cubic foot from any dryer exhaust stack.

36. **Testing Requirement:** Particulate Matter (0.10 gr/dscf), VOC and HAPs Emission Factor Verification

36.a. At least once prior to December 31, 2016 the permittee must demonstrate compliance with the emission limits specified in Condition 35 by conducting a source test for particulate matter emitted at the compliance demonstration point(s) for emissions unit Veneer Dryers.

36.a.i. Oregon DEQ Method 7 and EPA Methods 1 through 4 shall be used for measuring
particulate matter emissions from the RTO. Each test run shall be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 dsf. Test results shall be reported as grains per dry standard cubic foot (gr/dscf), pounds per hour, and pounds per 1000 square feet of veneer dried, on a 3/8” basis.

36.b. Prior to December 31, 2016 the permittee shall have simultaneous testing conducted for VOC, methanol, and formaldehyde by LRAPA approved test methods for verification of control efficiency referenced in Condition 38 and emission factors referenced in Condition 54.b.

36.b.i. EPA Method 25A shall be used to measure VOC. Test results shall be reported “as propane”. Methanol and formaldehyde are to be measured separately and concurrently to verify their contribution to the total VOC emissions. Mass emissions from EPA Method 25A (as propane), methanol and formaldehyde will be summed to determine total VOC. Test results shall be reported in pounds per hour, and pounds per 1000 square feet of veneer dried, on a 3/8” basis.

37. Monitoring and Recordkeeping Requirement:

37.a. Each test required by Condition 36 shall be conducted while the dryers are operating between 90 and 110% of the demonstrated maximum drying rate. For purposes of this permit, the demonstrated maximum drying is defined as the 90th percentile of all average hourly drying rates (based on daily production) during the 12-month period immediately preceding 30 days before the source test.

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

- Species of veneer dried;
- Amount of veneer dried (1000 sqft/hr on a 3/8” basis);
- Amount of redry (%);
- 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;
- Dryer conditions, including dryer temperatures by zone and drying time; and
- For establishing the RTO operating requirements referenced by Conditions 36 and 39: During the performance test, the permittee must continuously monitor the firebox temperature during each of the required 1-hour test runs. For the RTO, the permittee may measure the temperature in multiple locations (e.g., one location per burner) in the combustion chamber and calculate the average of the temperature measurements prior to reducing the temperature data to 15-minute averages for purposes of establishing the minimum firebox temperature. The minimum firebox temperature must then be established as the average of the three minimum 15-minute firebox temperatures monitored during the three test runs. Multiple three-run performance tests may be conducted to establish a range of parameter values under different operating conditions.

38. Applicable Requirement: Highest and Best Control (O&M) [LRAPA 33-060-3.A(5)]

Each veneer dryer shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emissions of all air contaminants are kept at the lowest practicable levels.

38.a. The permittee shall maintain the RTO such that VOC emissions are reduced by a minimum of
90%.

39. **Monitoring and Recordkeeping Requirements:** Highest and Best Control (O&M) [OAR 340-218-0050(3)]

39.a. Temperature monitoring: The permittee shall monitor RTO combustion chamber temperatures as follows:

39.a.i. Locate the temperature sensor in a position that provides a representative temperature.

39.a.ii. Use a temperature sensor with a minimum accuracy of 4 °F or 0.75 percent of the temperature value, whichever is larger.

39.a.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20 °F.

39.a.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30 °F of the process temperature sensor's reading.

39.a.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.

39.a.vi. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion.

39.b. The permittee must maintain the 3-hour block average firebox temperature in the RTO above the minimum temperature established during the compliance test required by Condition 36.

39.b.i. The permittee shall take corrective action anytime the 3-hour block average firebox temperature in the RTO is less than the minimum combustion temperature established during the compliance test required by Condition 36. An excursion of the action level for the RTO parameter shall not be considered a violation of the particulate concentration limit in this permit.

39.c. Every six (6) months the RTO shall be inspected for physical degradation that could affect the performance of the control device. The permittee shall make all necessary repairs to the RTO to ensure efficient operation. The results of the inspection and any repair activities shall be recorded in a log.

39.d. The permittee shall inspect the 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 twelve months and revised for necessary revision as determined by maintenance personnel.

39.e. Inspection and maintenance activity records and corrective action performed on the dryers and RTO shall be recorded on inspection and maintenance logs.
MILL EQUIPMENT (EU-4)

Table 5. Mill Equipment

<table>
<thead>
<tr>
<th>Applicable Requirement</th>
<th>Condition No.</th>
<th>Pollutant/Parameter</th>
<th>Limit/Standard</th>
<th>Averaging Time</th>
<th>Testing Condition</th>
<th>Monitoring Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>340-208-0110</td>
<td>40</td>
<td>Visible Emissions</td>
<td>20% opacity</td>
<td>6-minute block average</td>
<td>NA</td>
<td>41, 42</td>
</tr>
<tr>
<td>340-226-0210</td>
<td>43</td>
<td>PM</td>
<td>0.10 gr/dscf</td>
<td>Average of 3 test runs</td>
<td>44</td>
<td>45</td>
</tr>
</tbody>
</table>

40. **Applicable Requirement**: Visible Emissions [OAR 340-208-0110]

40.a. The permittee shall not cause or allow the visible emissions of any air contaminant into the atmosphere from any emission point in EU-4 equal to or greater than 20% opacity as a six-minute block average.

41. **Monitoring and Recordkeeping Requirement**: Visible Emissions – Inspection & Maintenance

41.a. At least once per month, visible emissions tests and/or surveys shall be conducted at each emissions point in emissions unit EU-4. If an exceedance of the of the opacity limit occurs, the frequency of visible emissions observations for that emission point shall be increased to weekly until 6 consecutive weeks of operation show opacity less than the 20% limit, then the visible emissions testing frequency may revert back to a monthly schedule.

41.b. EPA Method 9 shall be used to determine opacity in accordance with the ODEQ’s Source Sampling Manual. The visible emissions standards are based on the average of 24 consecutive observations recorded at 15-second intervals which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by EPA Method 9.

41.c. Visible emissions testing using EPA Method 9 may be waived for emission unit EU-4 provided both of the following conditions are met:

41.c.i. The permittee conducts a six (6) minute visible emissions survey of each point in the emissions unit, using EPA Method 22; and

41.c.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.

41.d. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.

41.e. 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 throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.
42. Monitoring and Recordkeeping Requirements: Visible Emissions – Operation & Maintenance

42.a. If at any time visible emissions are present determined by EPA method 22 from any EU-4 device, activity, or associated duct work, the permittee must immediately initiate corrective action to return the device or activity to its normal operating status such that no visible emissions are present. [NOTE: should visible emissions exceed the opacity standard, the permittee must also comply with Condition 63 (Excess Emissions Reporting).]

42.b. The permittee must maintain records of baghouse visible emissions incidents and corrective actions taken.

43. Applicable Requirement: Grain Loading [OAR 340-226-0210]

43.a. The permittee shall not cause or allow the emission of particulate matter, in excess of 0.10 grain per dry standard cubic foot, from any device in emissions unit EU-4.

44. Testing Requirement(s): Grain Loading

44.a. There are no testing requirements for this applicable requirement. If source testing is conducted in addition to the monitoring specified in this permit, the permittee shall comply with the testing requirements specified in Condition 57 and use the following test methods and averaging times to measure the pollutant emissions:
   
   44.a.i. Test method: ODEQ Method 8.
   
   44.a.ii. Averaging Time: average of three (3) one-hour test runs.

45. Monitoring and Recordkeeping Requirement(s): Grain Loading

45.a. Once per quarter, the permittee shall visually inspect the cyclones and baghouses and the associated blow pipe/duct work for structural integrity, corrosion, and air leaks. The permittee shall maintain a record of the inspections and any corrective action taken.
FUGITIVE SOURCES (EU-5)

Table 6. Fugitive Sources

<table>
<thead>
<tr>
<th>Applicable Requirement</th>
<th>Condition No.</th>
<th>Pollutant/Parameter</th>
<th>Limit/Standard</th>
<th>Testing Condition</th>
<th>Monitoring Condition</th>
</tr>
</thead>
<tbody>
<tr>
<td>340-208-0110</td>
<td>46</td>
<td>Fugitive Dust</td>
<td>Minimize Fugitive Dust Emissions</td>
<td>NA</td>
<td>47</td>
</tr>
</tbody>
</table>

46. **Applicable Requirement**: Visible Emissions  [OAR 340-208-0110]

46.a. The permittee shall not cause or allow the visible emissions of any air contaminant into the atmosphere from any emission point in EU-5 which is equal to or greater than 20% opacity as a six-minute block average.

47. **Monitoring and Recordkeeping Requirement**: Visible Emissions

47.a. The permittee shall comply with the requirements specified in Conditions 5 and 7 for monitoring of emissions unit EU-5.

Insignificant Activities Emission Limits and Standards

48. LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions [LRAPA 12-005] exist at facilities required to obtain a Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the applicable requirements that could apply to IEUs are incorporated as follows:

48.a. 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 minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water, from any categorically insignificant or aggregate insignificant source or activity.  [OAR 340-208-0110]

48.b. The permittee shall not cause or allow the emission of PM, in excess of 0.10 grains per dry standard cubic foot, corrected to 12% CO₂ 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.  [OAR 340-228-0210]

48.c. The permittee shall not cause or allow the emission of particulate matter, for any three-hour average period, in excess of 0.10 grains per dry standard cubic foot, from any non-fugitive insignificant air contaminant source.  [OAR 340-226-0210]

48.d. The permittee shall not cause or allow the emission of particulate matter in any one hour from any cyclone included in the aggregate insignificant activities emissions unit in excess of the amount shown in Table 1 in LRAPA 32-045, for the process weight allocated to that process.  [LRAPA 32-045]

49. **Testing, Monitoring, and Recordkeeping Requirements**:  
Unless otherwise specified in this permit or an applicable requirement, LRAPA is not requiring any testing, monitoring, recordkeeping, or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of "opacity" and "particulate matter" in LRAPA 12-005 and perform the testing in accordance with ODEQ’s Source Sampling Manual.
Emergency Reciprocating Internal Combustion Engines (RICE)

50. **Applicable Requirement:** The permittee must operate all emergency stationary reciprocating internal combustion engines (RICE) in accordance with the requirements below: [40 CFR 63.6640(f)]

50.a. There is no time limit on the use of emergency stationary RICE in emergency situations.

50.b. Operation of emergency stationary RICE for the purpose of maintenance checks and readiness testing (M&R testing) must be limited to 50^1 hours per year. [O&M, 32-007]

50.c. Monitoring shall be in accordance with Condition 52.

51. **Applicable Requirement** The permittee must comply with the following RICE management practices: [40 CFR Part 63.6595(a), 63.6603(a) and 40 CFR Part 63 Subpart ZZZZ, Table 2d and Table 6]

51.a. You must install a non-resettable hour meter if one is not already installed. [40 CFR 63.6625(f)];

51.b. Change the oil and filter every 500 hours of operation or annually, whichever comes first, unless an oil analysis program is performed as described in 40 CFR 63.6625(i) and (j);

51.c. For Compression Ignition RICE, inspect the air cleaner every 1,000 hours of operation or annually, whichever comes first; or

51.d. For Spark Ignition RICE inspect the spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary;

51.e. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary;

51.f. Operate and maintain the stationary RICE according to the manufacturer’s emission-related operation and maintenance instructions; [40 CFR 63.6625(e)(3)] or

51.g. Develop and follow your own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions; [40 CFR 63.6625(e)(3)] and

51.h. If it is not possible to shut down the engine in order to perform the management practice requirements on the schedule required in 51.b through 51.g because the emergency engine(s) is operating during an emergency, the management practice can be delayed until the emergency is over. The management practice should be performed as soon as practicable after the emergency has ended.

51.i. Monitoring shall be in accordance with Condition 52.

52. **Monitoring and Recordkeeping** The permittee must keep the following records for emergency RICE:

52.a. For each emergency generator or fire pump RICE, record the following each time it is operated:

52.a.i. Date of operation
52.a.ii. Time of engine start (clock time);
52.a.iii. Time of engine stop (clock time);
52.a.iv. Elapsed time from engine start to engine stop;
52.a.v. Reason for operation.
52.b. For each emergency RICE, record the total annual time of operation for maintenance checks and readiness testing (M&R testing);

52.c. Maintenance records for any emergency RICE as required in Condition 51.

1 On May 1, 2015, the U.S. Court of Appeals for the District of Columbia Circuit issued a decision that reversed the rules that contain the 100-hour exemption for emergency engines under the National Emissions Standards, 40 C.F.R. § 63.6640(f)(2), and the Performance Standards, 40 C.F.R. §§ 60.4211(f)(2), 60.4243(d)(2), and remanded them to EPA for further action. LRAPA therefore established an alternative limit based on LRAPA 32-007-1.
PLANT SITE EMISSION LIMITS (PSELS) [LRAPA Title 42]

53. The annual plant site emissions for the entire facility shall not exceed the following:

Table 7. Annual Plant Site Emission Limits

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Netting Basis (ton/year)</th>
<th>Components of the PSEL</th>
</tr>
</thead>
<tbody>
<tr>
<td>PM</td>
<td>152</td>
<td>176</td>
</tr>
<tr>
<td>PM_{10}</td>
<td>110</td>
<td>124</td>
</tr>
<tr>
<td>PM_{2.5}</td>
<td>45</td>
<td>54</td>
</tr>
<tr>
<td>CO</td>
<td>62</td>
<td>161</td>
</tr>
<tr>
<td>NO\textsubscript{X}</td>
<td>81</td>
<td>89</td>
</tr>
<tr>
<td>SO\textsubscript{2}</td>
<td>3</td>
<td>39</td>
</tr>
<tr>
<td>VOC</td>
<td>104</td>
<td>80</td>
</tr>
<tr>
<td>GHG</td>
<td>56,665</td>
<td>74,000</td>
</tr>
</tbody>
</table>

53.a. The facility’s unassigned emissions are not available for use unless the permit holder has applied for any necessary modification and construction permits and has received LRAPA approval based on applicable requirements at the time of application.

53.b. For the assigned PSEL, the total annual tons per year shall be determined as a rolling 12-month total in accordance with Condition 54.a.

54. Monitoring Requirement: The permittee shall determine compliance with the PSELS using the following monitoring and calculation procedures: [OAR 340-218-0050(3)]

Table 8. PSEL Monitoring

<table>
<thead>
<tr>
<th>Emissions Unit(s)</th>
<th>Process Parameter</th>
<th>Pollutant(s)</th>
<th>Measurement Technique</th>
<th>Measurement Frequency</th>
</tr>
</thead>
<tbody>
<tr>
<td>Boiler</td>
<td>Steam Production: (1000 lb)</td>
<td>PM, PM_{10}, PM_{2.5}, CO, NO\textsubscript{X}, SO\textsubscript{2}, and VOC</td>
<td>Recordkeeping</td>
<td>Monthly, Annual</td>
</tr>
<tr>
<td>Plywood Presses</td>
<td>Plywood Production: (1000 square feet - 3/8” basis)</td>
<td>PM, PM_{10}, PM_{2.5}, and VOC</td>
<td>Recordkeeping</td>
<td>Monthly, Annual</td>
</tr>
<tr>
<td>Emissions Unit(s)</td>
<td>Process Parameter</td>
<td>Pollutant(s)</td>
<td>Measurement Technique</td>
<td>Measurement Frequency</td>
</tr>
<tr>
<td>-------------------</td>
<td>-------------------</td>
<td>--------------</td>
<td>----------------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td>Veneer Dryers</td>
<td>Veneer Dried (1000 square feet – 3/8&quot; basis) and hours of RTO operation (hr)</td>
<td>PM, PM_{10}, PM_{2.5}, VOC, CO, and NO_{x}</td>
<td>Recordkeeping</td>
<td>Monthly, Annual</td>
</tr>
</tbody>
</table>

54.a.  The permittee shall determine compliance with the PSELs except GHGs by calculating the actual emissions for each 12-month period for each pollutant using the following equation.

\[ E = \left( \sum (P_{eu} \times EF_{eu}) \times K + C \right) + 1 \]

Where:
- \( E \) = total pollutant emissions (tons/year)
- \( P_{eu} \) = process parameter identified in Condition 54.
- \( EF_{eu} \) = emission factor identified for each emissions unit and pollutant in Condition 54.b.
- \( K \) = conversion constant 1 ton/2000 lbs
- \( C \) = constant for EU-5 PM, PM_{10}, PM_{2.5} from Table 9
- \( I \) = 1 ton for aggregate insignificant emissions for PM, PM_{10}, PM_{2.5}, and VOC, as applicable.

54.a.i.  The calculations for each 12-month period must be performed by the end of the following month for each period.

54.a.ii.  The permittee must maintain records of the calculations, results, and comparison to the PSEL for each period.

54.b.  The emission factors to be used in Condition 54.a for calculating the annual emissions to demonstrate compliance with the PSEL are displayed in Table 9 below.

Table 9. PSEL Emission Factors

<table>
<thead>
<tr>
<th>Emissions Unit(s)</th>
<th>Pollutant</th>
<th>Fuels/Species/Conditions</th>
<th>Emission Factor</th>
<th>Emission Factor Verification Testing</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td></td>
<td>Emission Factor Units</td>
<td>Yes/No</td>
</tr>
<tr>
<td><strong>Boilers</strong> (EU-1)</td>
<td>PM</td>
<td>Hugged fuel</td>
<td>0.574 (Boiler 1) 0.465 (Boiler 2)</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td></td>
<td>PM\textsubscript{10}</td>
<td>Hugged fuel</td>
<td>0.574 (Boiler 1) 0.465 (Boiler 2)</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td></td>
<td>PM\textsubscript{2.5}</td>
<td>Hugged fuel</td>
<td>0.344 (Boiler 1) 0.279 (Boiler 2)</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td></td>
<td>CO</td>
<td>Hugged fuel</td>
<td>0.376 (Boiler 1) 0.225 (Boiler 2)</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td></td>
<td>NO\textsubscript{x}</td>
<td>Hugged fuel</td>
<td>0.198 (Boiler 1) 0.266 (Boiler 2)</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td>Emissions Unit(s)</td>
<td>Pollutant</td>
<td>Fuels/Species/Conditions</td>
<td>Emission Factor</td>
<td>Emission Factor Units</td>
</tr>
<tr>
<td>------------------</td>
<td>-----------</td>
<td>--------------------------</td>
<td>-----------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td></td>
<td>SO2</td>
<td>Hogged fuel</td>
<td>0.014</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>Hogged fuel</td>
<td>1.5E-03 (Boiler 1) 9.3E-03 (Boiler 2)</td>
<td>lb/M lb steam</td>
</tr>
<tr>
<td>Plywood Presses</td>
<td>PM</td>
<td>NA</td>
<td>0.203</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td>(EU-2)</td>
<td>PM10</td>
<td>NA</td>
<td>0.196</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>PM2.5</td>
<td>NA</td>
<td>0.098</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>NA</td>
<td>0.07</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td>Veneer Dryers</td>
<td>PM</td>
<td>Douglas Fir</td>
<td>1.01</td>
<td>lb/MSF-3/8” veneer</td>
</tr>
<tr>
<td>with RTO (EU-3)</td>
<td>PM10</td>
<td>Douglas Fir</td>
<td>1.01</td>
<td>lb/MSF-3/8” veneer</td>
</tr>
<tr>
<td></td>
<td>PM2.5</td>
<td>Douglas Fir</td>
<td>0.829</td>
<td>lb/MSF-3/8” veneer</td>
</tr>
<tr>
<td></td>
<td>PM/PM10</td>
<td>Douglas Fir</td>
<td>7.5E-03</td>
<td>lb/MSF-3/8” veneer</td>
</tr>
<tr>
<td>(Fugitives)</td>
<td>CO</td>
<td>Natural Gas (RTO)</td>
<td>0.7486</td>
<td>lb/hr</td>
</tr>
<tr>
<td></td>
<td>NOx</td>
<td>Natural Gas (RTO)</td>
<td>0.234</td>
<td>lb/hr</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>Douglas Fir</td>
<td>0.101 (Dryers) 0.08 (Cooling Sections) 0.06 (Fugitives)</td>
<td>lb/MSF-3/8” veneer</td>
</tr>
<tr>
<td>Mill Equipment</td>
<td>PM</td>
<td>NA</td>
<td>0.1</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td>(EU-4)</td>
<td>PM10</td>
<td>NA</td>
<td>0.05</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td>Emissions Unit(s)</td>
<td>Pollutant</td>
<td>Fuels/Species/Conditions</td>
<td>Emission Factor</td>
<td>Emission Factor Units</td>
</tr>
<tr>
<td>------------------</td>
<td>-----------</td>
<td>--------------------------</td>
<td>-----------------</td>
<td>-----------------------</td>
</tr>
<tr>
<td></td>
<td>PM(_{2.5})</td>
<td>NA</td>
<td>0.05</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>VOC</td>
<td>NA</td>
<td>0.27</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td>Mill Fugitives</td>
<td>VOC</td>
<td>NA</td>
<td>0.08</td>
<td>lb/MSF-3/8” plywood</td>
</tr>
<tr>
<td>(EU-5)</td>
<td>PM</td>
<td>NA</td>
<td>3.2</td>
<td>ton/year</td>
</tr>
<tr>
<td></td>
<td>PM(_{10})</td>
<td>NA</td>
<td>1.6</td>
<td>ton/year</td>
</tr>
<tr>
<td></td>
<td>PM(_{2.5})</td>
<td>NA</td>
<td>0.2</td>
<td>ton/year</td>
</tr>
</tbody>
</table>

54.c. The permittee shall conduct emission factor verification tests in accordance with the DEQ's Source Sampling Manual and the testing requirements specified in Condition 57 for the emission units/emission factors identified in Condition 54.b as follows:

54.c.i. The testing required for Emission Unit EU-1 shall be conducted at least once within one (1) year prior to the expiration date of this permit.

54.c.ii. The testing required for Emission Unit EU-2 shall be conducted at least once prior to December 31, 2016.

54.c.iii. The testing required for Emission Unit EU-3 shall be conducted at least once prior to December 31, 2016 as required by Condition 36.

54.c.iv. 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 DEQ's Source Sampling Manual.

54.c.v. The permittee shall submit a summary of all emission factor verification tests to LRAPA within 60 days of any test. The summary shall include the following information: emission unit and monitoring point identification; emission results in pounds per hour and emission factor units; process parameters during the test (e.g., material throughput, steam production, etc.); and control device operating parameters.

54.c.vi. The emissions factors listed in Condition 54.b are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs shall only be determined by the calculations contained in Condition 54.a of this permit using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 54.b.
SYNTHETIC MINOR HAP REQUIREMENTS

55. In no event shall facility-wide emissions of hazardous air pollutants (HAP) exceed nine (9) tons per year of any single HAP and/or 24 tons per year of combined HAPs. [LRAPA 42-0060]

Synthetic Minor HAP Monitoring

56. To demonstrate compliance with the synthetic minor HAP emission limits the permittee must determine the actual HAP emissions emitted during each 12-month period by calculating the individual and total HAP emissions using the following formula by the end of the following month for each period. The permittee must maintain records of the emission calculations, results, and comparison to the HAP limits. [LRAPA 42-0080]

\[ E = \sum (P_{eu} \times EF_{eu}) \times K \]

Where,

- \( P_{eu} \) = process parameter identified in Condition 56.a.
- \( EF_{eu} \) = emission factor identified for each emissions unit and pollutant in Condition 56.a.
- \( K \) = conversion constant, 1 ton/2000 lbs

56.a. The emission factors that are to be used to demonstrate compliance with the synthetic minor HAP emission limits are provided in Table 10 below.

Table 10. HAP Emission Factors for Determining Synthetic Minor HAP Compliance

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Process/Device</th>
<th>Emission Factor</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Methanol (c)</td>
<td>Boilers</td>
<td>9.92E-04</td>
<td>lb/MLb steam</td>
</tr>
<tr>
<td></td>
<td>Plywood Presses (a)</td>
<td>5.40E-02</td>
<td>lb/Msf -3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>Veneer Dryers</td>
<td>1.90E-02</td>
<td>lb/Msf -3/8” veneer</td>
</tr>
<tr>
<td>Combined HAP</td>
<td>Boilers</td>
<td>8.96E-03</td>
<td>lb/MLb steam</td>
</tr>
<tr>
<td></td>
<td>Plywood Presses (b)</td>
<td>0.087</td>
<td>lb/Msf -3/8” plywood</td>
</tr>
<tr>
<td></td>
<td>Veneer Dryers</td>
<td>0.06</td>
<td>lb/Msf -3/8” veneer</td>
</tr>
</tbody>
</table>

Notes:
(a) Includes methanol emissions from wood residual handling and block conditioning.
(b) Includes HAP emissions from wood residual handling, block conditioning, and resin and glue handling.
(c) The only individual HAP near the 9 ton/year limit is Methanol. Other individual HAPs are less than 50% of the limit. Detailed HAP emission calculations are shown in Appendix C to the Review Report.

Synthetic Minor HAP Testing

56.b. By no later than December 31, 2016, the permittee shall perform source tests at the compliance demonstration points for emission unit Veneer Dryers to evaluate the HAP emission factors.

56.b.i. The emissions units Veneer Dryers must be tested for the following hazardous air pollutants: Acetaldehyde, Acrolein, Formaldehyde, Methanol, Phenol, and Propionaldehyde.
56.b.ii. The emission factors verification tests shall be conducted using EPA-approved test methods for the tested HAP.

56.c. By no later than December 31, 2016, the permittee shall perform source tests at the compliance demonstration points for emission unit Plywood Presses to evaluate the HAP emission factors.

56.c.i. The emissions unit Plywood Presses (EU-2) must be tested for the following hazardous air pollutants by testing a single press operating under normal load: Acetaldehyde, Acrolein, Formaldehyde, Methanol, Phenol, and Propionaldehyde.

56.c.ii. The emission factors verification tests shall be conducted using EPA-approved test methods for the tested HAP.

56.d. The use of updated HAP emission factors and any associated verification tests are subject to the requirements in the above permit Conditions 54.c.iv, 54.c.v, and 54.c.vi.

GENERAL TESTING REQUIREMENTS

57. Unless otherwise specified in this permit, the permittee shall conduct all testing in accordance with the DEQ Source Sampling Manual. [LRAPA 35-0110 through 0160]

57.a. 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.

57.b. Unless otherwise specified by permit condition or LRAPA-approved source test plan, all compliance source tests shall be performed at maximum operating rates (90 to 110% of device design capacity).

57.c. 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. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

57.d. Source test reports prepared in accordance with ODEQ's Source Sampling Manual shall be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS [OAR 340-218-0050(3)(a) and (b)]

58. Monitoring Requirements:

58.a. The permittee shall not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]

58.b. Methods used to determine actual emissions for fee purposes shall also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]

58.c. Monitoring requirements shall commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]
59. **Recordkeeping Requirements:**

59.a. The permittee shall maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(b)(A)]

59.a.i. the date, place as defined in the permit, and time of sampling or measurements;
59.a.ii. the date(s) analyses were performed;
59.a.iii. the company or entity that performed the analyses;
59.a.iv. the analytical techniques or methods used;
59.a.v. the results of such analyses;
59.a.vi. the operating conditions as existing at the time of sampling or measurement; and
59.a.vii. the records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).

59.b. Unless otherwise specified by permit condition, the permittee shall make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) shall not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee shall document the reason for the missing record. In addition, any missing record that can be recovered from other available information shall not be considered a missing record. [OAR 340-214-0110, 340-212-0160, and 340-218-0050(3)(b)]

59.c. Recordkeeping requirements shall commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]

59.d. Unless otherwise specified, 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. [OAR 340-218-0050(b)(B)]

**REPORTING REQUIREMENTS**

60. The permittee shall submit three (3) copies of reports of any required monitoring at least every six (6) months, completed on forms approved by LRAPA. Six-month periods are January 1 to June 30, and July 1 to December 31. Two copies of the report shall be submitted to LRAPA and one copy to the EPA. All instances of deviations from permit requirements shall be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]

60.a. The first semi-annual report shall be received by July 30 and shall include the semi-annual compliance certification. [OAR 340-218-0080]

60.b. The annual report shall be received by February 15 and shall consist of the following:

60.b.i. The emission fee report; [OAR 340-220-0100]
60.b.ii. A summary listing of excess emission events and where applicable, current procedures to minimize emissions during startup, shutdown, or maintenance as outlined in 36-010 and 36-015. The permittee shall specify in writing whether these procedures are new, modified, or have already been approved by LRAPA;
61. The semi-annual compliance certification shall include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable):

61.a. The identification of each term or condition of the permit that is the basis of the certification;

61.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means shall include, at a minimum, the methods and means required under OAR 340-218-0050(3). If necessary, the owner or operator also shall identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;

61.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in OAR 340-218-0040(6)(c)(B). The certification shall identify each deviation and take it into account in the compliance certification. The certification shall also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred; and

61.d. Such other facts as LRAPA may require to determine the compliance status of the source;

62. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-00500(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications.

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

63.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 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 Condition 63.g.

63.b. Notification shall be made to LRAPA. The current LRAPA telephone number is (541) 736-1056.
63.c. In the event of any excess emissions, which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the Oregon Accident Response System (OARs). The current number is 1-800-452-0311.

63.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 OAR 340-214-03310 and LRAPA 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.

63.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.

63.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.

63.g. In accordance with LRAPA 36-025, for any excess emissions event the permittee must submit to LRAPA a written report of excess emissions for each calendar day of the event. The report must be submitted within 15 days of the date of the event (unless based on the severity of the event, the Department specifies a shorter time period for submittal for the report) and include the following:

63.g.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operations;
63.g.ii. The date and time the owner or operator notified the LRAPA of the event;
63.g.iii. The equipment involved;
63.g.iv. Whether the event occurred during a period of planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
63.g.v. Steps taken to mitigate emissions and corrective actions taken,
63.g.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or a best estimate (supported by operating data and calculations);
63.g.vii. The final resolution of the cause of the excess emissions; and
63.g.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to an emergency pursuant to LRAPA 36-040.

Permit Deviation Reporting

64. The permittee shall promptly report 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 preventive measures taken. “Prompt” means within 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA 36-001 through 36-030 shall be reported in accordance with LRAPA 36-025. [OAR 340-218-00500(3)(c)(B)]

Source Test Reporting

65. The permittee shall submit any required source test report within 60 days after the source test; unless otherwise approved in the source test plan. [OAR 340-218-00500(3)(c)(C) and LRAPA 34-070]
Certification of Reports

66. All required reports shall be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]

Reporting Commencement Date

67. Reporting requirements shall commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

Greenhouse Gas Registration and Reporting

68. If the calendar year emission rate of greenhouse gases (CO2e) is greater than or equal to 2,756 tons (2,500 metric tons including both biogenic and anthropogenic), the permittee must register and report its greenhouse gas emissions with LRAPA in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5). [OAR 340-215-0040]

Agency Addresses

69. Addresses of regulatory agencies are the following, unless otherwise instructed:

LRAPA
1010 Main Street
Springfield, OR 97477
(541) 736-1056

Part 70 Air Quality Permits
U.S. EPA Region 10, AWT-107
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
(206) 553-1200 or 800-424-4372 in the Region 10 states

MAX/CMW
01/05/16
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:

b. Continuous Monitoring Manual; April 16, 2015 - 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. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(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 re-issuance, 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 re-issuance, 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.

G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [LRAPA 49-040] This condition is enforceable only by LRAPA.
G6. **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 340-214-0120]

G7. **Certification** [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(d), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA 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.

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.


The permittee shall comply with OAR 340-248-0200 through 340-248-0280, 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 340-218-0110]

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 department);
   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 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Lane Regional Air Protection Agency, 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 a 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 LRAPA rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.


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 Protection Agency, 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 340-218-0140(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 LRAPA Title 12.

b. A contemporaneous notification, if required under OAR 340-218-0140(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 340-218-0140(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 340-218-0140(3)(b).

c. The permit shield of Condition G11 shall not extend to Section 502(b)(10) changes.

G16. **Administrative Amendment** [OAR 340-218-0150]

Administrative amendments to this permit shall be requested and granted in accordance with OAR 340-218-0150. 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 340-218-0170]

The permittee shall submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G18. **Significant Permit Modification** [OAR 340-218-0180]

The permittee shall submit an application for a significant permit modification in accordance with OAR 340-218-0180.

G19. **Staying Permit Conditions** [OAR 340-218-0050(6)(e)]

Notwithstanding Conditions G14 and G15, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

G20. **Construction/Operation Modification** [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source of air pollution control equipment in accordance with LRAPA 34-010 and 34-034 through 34-038.

G21. **New Source Review Modification** [LRAPA Title 38]
No permittee shall construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010).

G22. Need to Halt or Reduce Activity Not a Defense  [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will 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 340-218-0050(6)(e) and LRAPA 34-015]

The permittee must 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 must also furnish to LRAPA copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to LRAPA along with a claim of confidentiality.

G24. Reopening for Cause  [OAR 340-218-0050(6)(c) and 340-218-020]

a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.

b. A permit shall be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).

c. 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 340-218-0050(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.


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 must provide no less than six (6) months for the owner or operator to prepare an application.

c. 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 340-218-0150(1)(d)]

The permit is not transferable to any person except as provided in OAR 340-218-0150(1)(d).

G28. Property Rights  [OAR 340-200-0020(9)(c) and 340-218-0050(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 340-218-0110.

G29. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

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

ALL INQUIRIES SHOULD BE DIRECTED TO:

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056
ATTACHMENT A: Air Pollution Emergencies

Table I

AIR POLLUTION EPISODE: ALERT CONDITION

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For Alert Conditions due to excessive levels of carbon monoxide or ozone, persons operating motor vehicles shall be requested to voluntarily curtail or eliminate all unnecessary operations within the designated Alert Area, and public transportation systems shall be requested to provide additional services in accordance with a preplanned strategy.

Part B: Pollution Episode Conditions for Particulate Matter

For Alert Conditions resulting from excessive levels of particulate matter, the following measures shall be taken in the designated area:

1. There shall be no open burning by any person of any material.

2. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12 noon and 4 p.m.

3. Persons responsible for the operation of any source of air contaminants listed below shall take all required actions for the Alert Level, in accordance with the preplanned strategy:

<table>
<thead>
<tr>
<th>Source of Contamination</th>
<th>Control Actions — Alert Level</th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Coal, oil, or wood-fired facilities.</td>
<td>1) Utilization of electric generating fuels having low ash and sulfur content.</td>
</tr>
<tr>
<td></td>
<td>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</td>
</tr>
<tr>
<td></td>
<td>3) Diverting electric power generation to facilities outside of Alert Area.</td>
</tr>
<tr>
<td>B. Coal, oil, or wood-fired process steam generating facilities.</td>
<td>1) Utilization of fuel having low ash and sulfur content.</td>
</tr>
<tr>
<td></td>
<td>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</td>
</tr>
<tr>
<td>Source of Contamination</td>
<td>Control Actions — <em>Alert Level</em></td>
</tr>
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</tr>
<tr>
<td></td>
<td>3) Substantial reduction of steam load demands consistent with continuing plant operations.</td>
</tr>
<tr>
<td>C. Manufacturing industries of the following classifications:</td>
<td>1) Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations.</td>
</tr>
<tr>
<td></td>
<td>2) Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance.</td>
</tr>
<tr>
<td></td>
<td>3) Reduction of heat load demands for processing.</td>
</tr>
<tr>
<td></td>
<td>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</td>
</tr>
</tbody>
</table>
Table II

AIR POLLUTION EPISODE: WARNING CONDITIONS

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For Warning Conditions, resulting from excessive levels or carbon monoxide or ozone, the following measures shall be taken:

1. Operation of motor vehicles carrying fewer than three (3) persons shall be prohibited within designated areas during specified hours. Exceptions from this provision are:
   A. Public transportation and emergency vehicles
   B. Commercial vehicles
   C. Through traffic remaining on Interstate or primary highways.

2. At the discretion of the Agency, operations of all private vehicles within designated areas or entry of vehicles into designated areas may be prohibited for specified periods of time.

3. Public transportation operators shall, in accordance with a pre-planned strategy, provide the maximum possible additional service to minimize the public’s inconvenience as a result of No. 1 or No. 2. above.

4. For ozone episodes the following additional measures shall be taken:
   A. No bulk transfer of gasoline without vapor recovery from 2:00 a.m. to 2:00 p.m.
   B. No service station pumping of gasoline from 2:00 a.m. to 2:00 p.m.
   C. No operation of paper coating plants from 2:00 a.m. to 2:00 p.m.
   D. No architectural painting or auto finishing;
   E. No venting of dry cleaning solvents from 2:00 a.m. to 2:00 p.m. (except perchloroethylene).

5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.

Part B: Pollution Episode Conditions for Particulate Matter

For Warning Conditions resulting from excessive levels of particulate matter, the following measures shall be taken:

1. There shall be no open burning by any person of any material.

2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.

3. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12 noon and 4 p.m.

4. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.
5. Persons responsible for the operation of any source of air contaminants listed below shall take all required actions for the **Warning Level**, in accordance with a preplanned strategy:

<table>
<thead>
<tr>
<th>Source of Contamination</th>
<th>Control Actions — <strong>Warning Level</strong></th>
</tr>
</thead>
</table>
| A. Coal, oil, or wood-fired electric power generating facilities. | 1) Maximum utilization of fuels having lowest ash and sulfur content.  
2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.  
3) Diverting electric power generation to facilities outside of **Warning Area**.  
4) Prepare to use a plan of action if an **Emergency Condition** develops.  
5) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power. |
| B. Coal, oil, or wood-fired process steam generating facilities. | 1) Maximum utilization of fuels having the lowest ash and sulfur content.  
2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.  
3) Prepare to use a plan of action if an **Emergency Condition** develops.  
4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power. |
| C. Manufacturing industries which require considerable lead time for shut-down including the following classifications:  
- Petroleum Refining  
- Chemical Industries  
- Primary Metals Industries  
- Glass Industries  
- Paper and Allied Products | 1) Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.  
2) Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.  
3) Maximum reduction of heat load demands for processing.  
4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence of boiler lancing or soot blowing. |
<table>
<thead>
<tr>
<th>Source of Contamination</th>
<th>Control Actions — <strong>Warning Level</strong></th>
</tr>
</thead>
<tbody>
<tr>
<td>D. Manufacturing industries which require relatively short time for shut-down.</td>
<td>1) Elimination of air contaminants from manufacturing operations by ceasing, allied operations to the extent possible without causing injury to persons or damage to equipment.</td>
</tr>
<tr>
<td></td>
<td>2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.</td>
</tr>
<tr>
<td></td>
<td>3) Reduction of heat load demands for processing.</td>
</tr>
<tr>
<td></td>
<td>4) Utilization of mid-day (12 noon to 4 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</td>
</tr>
</tbody>
</table>
Table III

AIR POLLUTION EPISODE: EMERGENCY CONDITIONS

EMISSION REDUCTION PLAN

1. There shall be no open burning by any person of any material.

2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.

3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture shall immediately cease operation, except the following:

   A. Police, fire, medical and other emergency services;
   B. Utility and communication services;
   C. Governmental functions necessary for civil control and safety;
   D. Operations necessary to prevent injury to persons or serious damage to equipment or property;
   E. Food stores, drug stores and operations necessary for their supply;
   F. Operations necessary for evacuation of persons leaving the area;
   G. Operations conducted in accordance with an approved preplanned emission reduction plan on file with the Agency.

4. All commercial and manufacturing establishments not included in these rules shall institute such actions as will result in maximum reduction of air contaminants from their operations which emit air contaminants, to the extent possible without causing injury or damage to equipment.

5. The use of motor vehicles is prohibited except for the exempted functions in 3, above.

6. Airports shall be closed to all except emergency air traffic.

7. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces.

8. Any person responsible for the operation of a source of atmospheric contamination listed below shall take all required control actions for this *Emergency Level*.

<table>
<thead>
<tr>
<th>Source of Contamination</th>
<th>Control Actions — <em>Emergency Level</em></th>
</tr>
</thead>
<tbody>
<tr>
<td>A. Coal, oil, or wood-fired electric power generating facilities.</td>
<td>1) Maximum utilization of fuels having lowest ash and sulfur content.</td>
</tr>
<tr>
<td></td>
<td>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</td>
</tr>
<tr>
<td>Source of Contamination</td>
<td>Control Actions — <strong>Emergency Level</strong></td>
</tr>
<tr>
<td>------------------------------------------------</td>
<td>-------------------------------------------------------------------------------------------------------</td>
</tr>
<tr>
<td>3) Diverting electric power generation to facilities outside of Emergency area.</td>
<td></td>
</tr>
<tr>
<td>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</td>
<td></td>
</tr>
<tr>
<td><strong>B. Coal, oil, or wood-fired steam generating facilities.</strong></td>
<td>1) Reducing heat and steam process demands to absolute necessities consistent with preventing equipment damage.</td>
</tr>
<tr>
<td>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</td>
<td></td>
</tr>
<tr>
<td>3) Taking the action called for in the emergency plan.</td>
<td></td>
</tr>
<tr>
<td>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</td>
<td></td>
</tr>
<tr>
<td><strong>C. Manufacturing industries of the following classifications:</strong></td>
<td>1) The elimination of air of contaminants from manufacturing operations by ceasing, curtailing, postponing or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment.</td>
</tr>
<tr>
<td>- Primary Metals Industry</td>
<td>2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.</td>
</tr>
<tr>
<td>- Chemical Industries</td>
<td>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</td>
</tr>
<tr>
<td>- Mineral Processing Industries</td>
<td></td>
</tr>
</tbody>
</table>