

BASIC
AIR CONTAMINANT DISCHARGE PERMIT

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
(541) 736-1056

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

ISSUED TO:

Northwest Hardwoods - Bethel
PO Box 40130
Eugene, Oregon 97404

INFORMATION RELIED UPON:

Application No.: 64276
Date Received: 10/09/18

PLANT SITE LOCATION:

990 Bethel Drive
Eugene, Oregon 97404

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: 08/18/00

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

OCT 10 2018

Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 9	Sawmill less than 25,000 board feet per 8 hours of finished product.	2421
Part A, 2	Boiler less than 10MMBtu/hr heat input – natural gas-fired	4961

1.0 PERMIT ASSIGNMENT

- 1.1 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit.

2.0 EMISSION STANDARDS AND LIMITS

- 2.1 Visible Emissions** Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour. "Opacity" means the degree to which an emission reduces transmission of light and obscures the view of an object in the background.
- 2.2 Production Limitation** The source must limit the kiln drying of lumber and lumber processed to less than 25,000 board feet per 8 hours of finished product.
- 2.3 Fugitive Emissions** The permittee must take reasonable precautions for preventing fugitive dust emissions.
- 2.4 Particulate Matter Fallout** The permittee must not cause or permit the deposition of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person.
- 2.5 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.
- 2.6 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.

3.0 RECORDKEEPING AND REPORTING REQUIREMENTS

- 3.1 Records** The permittee must maintain records of the information identified in Condition 3.2 for at least five (5) years from the date of the record.
- 3.2 Reports** The permittee is required to report to LRAPA by **February 15th** of each year the following information:
- a. Approximate number of board feet of kiln-dried lumber (board feet per year and board fee per maximum 8 hour input);
 - b. Amount of natural gas combusted annually (cubic feet per year); and
 - c. Written log of all air quality or nuisance complaints and how each complaint was handled.
- 3.3 Permit Renewal** The permittee must submit an application to renew the permit 60 days prior to the expiration date.
- 3.4 Construction or Modification Notices** The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to, or emissions are significantly changed or increased.
- 3.5 Where to Send Reports and Notices** The reports and notices, with the permit number prominently displayed, must be sent to the LRAPA office identified on the cover page of the permit.

4.0 FEES

- 4.1 Fees** The Annual Fee specified in LRAPA Section 37-0020, Table 2, Part 2 for a Basic ACDP is due on **December 1st** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

5.0 GENERAL CONDITIONS

- 5.1 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions 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.
- 5.2 Open Burning** The permittee may not conduct any open burning except when approved by LRAPA in advance.

- 5.3 Asbestos** All activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance must be performed by persons certified for asbestos abatement projects. Accumulation of asbestos containing material is prohibited. If you have asbestos questions, contact LRAPA office identified below.
- 5.4 Permit Availability** The permittee must have a copy of the permit available at all times.
- 5.5 LRAPA Inspections** The permittee must allow LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit.
- 5.6 Legal Disclaimers** The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations.
- 5.7 Permit Revocation** This permit is subject to revocation for cause.
- 5.8 LRAPA Contact** Call the LRAPA office in Springfield at (541) 736-1056.

Max
10/9/18

Lane Regional Air Protection Agency

**BASIC
AIR CONTAMINANT DISCHARGE PERMIT
REVIEW REPORT**

Northwest Hardwoods - Bethel
990 Bethel Drive
Eugene, Oregon 97404
503-816-5232
<http://northwesthardwoods.com/>

Reports			NSPS	Size	Public Notice Category
Annual	Semi-annual	Excess Emissions			
2/15	NA	NA	NA	Basic	1

1. The proposed permit is a change in the permit type for an existing facility located on 990 Bethel Drive in Eugene. The facility has been operating on a General Air Contaminant Discharge Permit (ACDP) since 2011 (AQGP-010).
2. The permittee operates a hardwood lumber drying facility. Alder and maple are the two species of wood dried at the facility. The facility has five (5) dry kilns but only two (2) are currently functional. The facility also has two (2) natural gas-fired boilers onsite, but only one is functional: one 8.4 MMBtu/hr Cleaver Brooks (ID 200) and one 12.6 MMBtu/hr Cleaver Brooks (ID 300). The number 300 boiler is not functional, and the facility indicates they have no plans to use it. The number 200 boiler is operated up to two weeks every year to heat up to two kilns.
3. The facility now qualifies for a Basic ACDP since kiln drying of lumber is less than 25,000 board feet per 8 hours of finished product. The kilns are currently operated for about 5-10 days per year.
4. The facility is located in an attainment area for all pollutants. The Eugene Springfield Air Quality Maintenance Area is currently a maintenance area for PM₁₀ and CO.
5. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases the emission will not exceed 5 tons of PM, PM₁₀ or PM_{2.5} or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
6. Pursuant to LRAPA Section 37-0056-4, issuance of a new Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA Section 31-

0030-3.A. Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

Max/rcf – 10/09/18

Emission Details

Northwest Hardwoods Bethel Division						
Permit No. 200023						
2 Boilers (Cleaver Brooks) - Natural Gas						
Pollutant	Max Design capacity (cubic ft/hr)	Emission Factor (lbs/10 ⁶ ft ³)	Conversion Factor (tons/lb)	Annual Emissions (tons)	Hourly Emissions (pounds)	
PM/PM10	8,400	7.6	0.0005	0.3	0.1	
SO2	8,400	0.6	0.0005	0.0	0.0	
NOx	8,400	100	0.0005	3.7	0.8	
CO	8,400	84	0.0005	3.1	0.7	
VOC	8,400	5.5	0.0005	0.2	0.0	

Boiler is capable of operating 8760 hours per year but currently only runs 5-10 days per year.
 Boiler 200 operates at a maximum rate of 8.4 MM Btu/hr.
 Boiler 300 is currently not functional but is rated at 12.6 MM Btu/hr.
 Boilers operate at a combined maximum rate of 21,000 cubic feet per hour (1 cubic foot of natural gas = 1000 BTU).
 Gaseous emission factors are obtained from AP-42 table 1.4-2 (3/98) for small boilers, uncontrolled.
 Annual Emissions (tons) = maximum gas usage x emission factor x 1 ton/2000 pounds x 8760 hours per year x 1/10⁶.
 Hourly Emissions (pounds) = Max gas usage x emission factor x 1/10⁶.

Dry Kilns (5)						
Pollutant	Max throughput (bd feet/year)	Emission Factor (lb/1000 bd feet)	Conversion Factor (ton/lb)	Annual Emissions (tons)	Monthly Emissions (tons)	
VOC	1,000,000	3.8	0.0005	1.9	0.2	

The facility has 5 dry kilns which dry a maximum of 35 MM board feet per year.
 However, only 2 dry kilns are currently functional and a maximum of 1 MMBF/year of lumber is dried
 Emission factor was obtained from AQGP-010 using the most conservative wood species (P.Pine and >200F drying temps).
 Annual emissions (tons) = Max throughput x emission factor x conversion factor.
 Monthly emissions (pounds) = Annual Emissions x 1yr/12 months x 2000 lbs/ton.