



**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)  
TITLE V OPERATING PERMIT**

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

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

ISSUED TO:

**Kingsford Manufacturing Company**  
3315 Marcola Road  
Springfield, Oregon 97478

INFORMATION RELIED UPON:

Application Number: 66298  
Received: July 15, 2020

PLANT SITE LOCATION:

3315 Marcola Road  
Springfield, Oregon 97478

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield  
Dated: July 1, 1999

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

September 14, 2020  
Date

| <u>Nature of Business</u> | <u>SIC</u> | <u>NAICS</u> |
|---------------------------|------------|--------------|
| Charcoal Manufacturing    | 2861       | 325191       |

RESPONSIBLE OFFICIAL

Title: Plant Manager

FACILITY CONTACT PERSON

Name: Karen Chavez  
Title: Plant Engineer  
Phone: (541) 744-4558

**ADDENDUM NO. 1  
(Minor Permit Modification)**

In accordance with OAR 340-218-0170(1)(a), Title V Operating Permit No. 204402 is hereby amended to reduce the unassigned emissions associated with PM<sub>10</sub> and NO<sub>x</sub>, add a limitation related to the Regional Haze program, and update the permit to reflect the use of propane as a backup fuel for natural gas.

Condition 3 is modified as follows to remove fuel specific references in emission unit names:

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

| EU ID | Emission Unit Description                | Pollution Control Device Description  | PCD ID |
|-------|--|---|--------|
| EU01  | Wood Fuel Receipt and Storage            | Tilt-Dump Controls <ul style="list-style-type: none"> <li>• Partial Enclosure with Negative Air</li> <li>• Baghouse</li> <li>• Water Spray</li> </ul> | NA     |
| EU02  | Hogfuel Sizing and Infeed System         | NA  | NA     |
| EU03  | Charring and Drying System:              |   |        |
|       | Wood Fuel Drying System                  | After Combustion Chamber  | 03-01C |
|       | Charcoal Manufacturing                   | After Combustion Chamber  | 03-01C |
|       | Briquet Dryers                           | NA  | NA     |
|       | <b>ACC Burners for Startup</b>           | NA  | NA     |
| EU04  | Briquet Cooling                          | NA  | NA     |
| EU08  | Briquet Handling System:                 |   |        |
|       | Briquetting                              | Wet Scrubber  | 08-26C |
|       | Briquet Conveying                        | Small Vokes Dust Collector  | 08-27C |
|       |  | West Dust Collector   | 08-29C |
|       |  | East Dust Collector   | 08-30C |
|       | Briquet Packaging                        | North Package Bin Vent Dust Collector   | 08-41C |
|       |  | South Package Bin Vent Dust Collector   | 08-42C |
| EU10  | <b>3.345 MMBtu/hr Boiler</b>             | NA  | NA     |
| EU11  | Solvent Treated Briquet (STB) Operation  | ACC   | 03-01C |
|       |  | West Dust Collector   | 08-29C |
| EUAIA | Aggregate Insignificant Activities (AIA) | See Emission Detail Sheets  | NA     |

Condition 4 is modified as follows to indicate that certain natural gas-fired equipment may also use propane:

4. The permittee may also operate under the following two (2) alternative operating scenarios: [LRAPA 34-180 and OAR 340-218-0140(1)]

- 4.a. EU03-1 ACC Shutdown Briquet Dryer Emissions – When the retort furnace and wood dryer systems in EU03 are shut down and no char is being produced, the source may operate an auxiliary natural gas- **or propane-fired** burner to provide heat to the briquet dryers. [LRAPA 34-180 and OAR 340-218-0050(8)]
- 4.b. EU03-2 ACC Burner Startup, Planned Shutdown, Scheduled Maintenance, or Malfunction Emissions – During retort furnace and wood dryer startups, when no char is being produced, the source may operate natural gas- **or propane-fired** burners in the ACC to maintain minimum ACC combustion temperatures. [LRAPA 34-180 and OAR 218-0050(8)]
- 4.c. The permittee must contemporaneously record changes from one alternative operating scenario to another. The record must be made available or submitted upon request by the LRAPA. [LRAPA 34-180 and OAR 340-218-0140(1)(c), 340-218-0050(8)(a)]

Condition 26.a. is modified as follows to indicate that certain natural gas-fired equipment may also use propane:

26.a. The permittee must maintain an operating temperature of at least a 1400°F in the ACC on the retort furnace, except during startup, shutdown or maintenance. The ACC operating temperature must be continuously monitored in the outlet of the ACC combustion chamber, and recorded automatically on a strip chart or data acquisition system. Corrective action must be taken within 10 minutes if the ACC operating temperature falls below 1500°F, except during startup, shutdown or maintenance. Corrective actions include, but are not limited to, turning on auxiliary natural gas- **or propane-fired** burners to provide additional heat.

The name of the categorically insignificant emission unit listed prior to Condition 60 is modified from “274 kW Natural Gas-Fired Emergency RICE” to “274 kW Gas-Fired Emergency RICE” so that the emission unit name is not fuel specific.

The table related to Condition 71 is modified as follows with the revisions in **bold**:

| Pollutant               | Plant Site Emission Limit (TPY) | Unassigned Emissions (TPY) | Emission Reduction Credit (TPY) |
|-------------------------|---------------------------------|----------------------------|---------------------------------|
| PM                      | 164                             | 134                        | 0                               |
| PM <sub>10</sub>        | 103                             | <b>46</b>                  | 0                               |
| PM <sub>2.5</sub>       | 96                              | 51                         | 0                               |
| SO <sub>2</sub>         | 39                              | 0                          | 0                               |
| NO <sub>x</sub>         | 103                             | <b>39</b>                  | 0                               |
| CO                      | 99                              | 0                          | 0                               |
| VOC                     | 96                              | 0                          | 0                               |
| GHG (CO <sub>2</sub> e) | 214,233                         | 0                          | 0                               |

Condition 71.a. is added as follows to limit emissions of Regional Haze pollutants PM<sub>10</sub>, NO<sub>x</sub> and SO<sub>2</sub> to no more than 304 TPY combined:

71.a. The combined emissions of Regional Haze precursor emissions as determined in the formula below must not exceed the following limit for any 12 consecutive calendar month period: [40 CFR 51.308(d)(3)(v)(C)&(F)]

$$PM_{10} PSEL + PM_{10} UE + NO_x PSEL + NO_x UE + SO_2 PSEL + SO_2 UE - (SO_2 PSEL - SO_2 PTE) \leq 304 TPY$$

Where:

- PM<sub>10</sub> PSEL is the PM<sub>10</sub> Plant Site Emission Limit as calculated in Conditions 72 and 73, in tons per year;
- PM<sub>10</sub> UE are the PM<sub>10</sub> unassigned emissions as listed in Condition 71, in tons per year;
- NO<sub>x</sub> PSEL is the NO<sub>x</sub> Plant Site Emission Limit as calculated in Conditions 72 and 73, in tons per year;
- NO<sub>x</sub> UE are the NO<sub>x</sub> unassigned emissions as listed in Condition 71, in tons per year;
- SO<sub>2</sub> PSEL is the SO<sub>2</sub> Plant Site Emission Limit as listed in Condition 71, in tons per year;
- SO<sub>2</sub> UE are the SO<sub>2</sub> unassigned emissions as listed in Condition 71, in tons per year; and
- SO<sub>2</sub> PTE is the facility potential to emit for SO<sub>2</sub> as listed in the most recent final review report, in tons per year.

The table related to Condition 72 is modified as follows with the revisions in **bold**:

| Emissions Unit ID | Emission Unit  | Pollutant   | Process Parameter Monitored  | Emission Factor (EF)   | EF Verification Testing Condition   | Monitoring and Record Keeping Condition |    |
|-------------------|--|---|--|--|---|---|----|
| EU01              | Wood Receipt and Storage                             | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Wood Throughput (dry tons)   | PM = 0.10 lb/dry ton<br>PM <sub>10</sub> = 0.05 lb/dry ton<br>PM <sub>2.5</sub> = 0.01 lb/dry ton  | Not Required  | 72                                      |    |
| EU02              | Hogfuel Sizing & Infeed System                       | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Actual Hours of Operation for Screener In, Screener Out, Secondary Screen In, Secondary Screen Out, and Reject Diverter (hr-opr) | Screener In:   | PM = 0.096 lb/hr-opr<br>PM <sub>10</sub> = 0.048 lb/hr-opr<br>PM <sub>2.5</sub> = 0.003 lb/hr-opr   | Not Required                            | 72 |
|                   |  |   |  | Screener Out:  | PM = 0.0192 lb/hr-opr<br>PM <sub>10</sub> = 0.01 lb/hr-opr<br>PM <sub>2.5</sub> = 0.001 lb/hr-opr   |   |    |
|                   |  |   |  | Secondary Screen In:   | PM = 0.0192 lb/hr-opr<br>PM <sub>10</sub> = 0.01 lb/hr-opr<br>PM <sub>2.5</sub> = 0.001 lb/hr-opr   |   |    |
|                   |  |   |  | Secondary Screen Out:  | PM = 0.0048 lb/hr-opr<br>PM <sub>10</sub> = 0.002 lb/hr-opr<br>PM <sub>2.5</sub> = 0.0002 lb/hr-opr |   |    |
|                   |  |   |  | Reject Diverter:   | PM = 0.0192 lb/hr-opr<br>PM <sub>10</sub> = 0.01 lb/hr-opr<br>PM <sub>2.5</sub> = 0.001 lb/hr-opr   |   |    |
| EU03              | Charring and Drying System                           | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Char Production (tons)   | PM = 5.12 lb/ton<br>PM <sub>10</sub> = 3.43 lb/ton<br>PM <sub>2.5</sub> = 3.43 lb/ton  | 76  | 72                                      |    |
|                   |  | VOC, NOx, SO <sub>2</sub> , CO  | Char Production (tons)   | VOC = 0.3 lb/ton<br>NOx = 3.9 lb/ton<br>SO <sub>2</sub> = 0.5 lb/ton<br>CO = 0.85 lb/ton   | 77  | 72                                      |    |
| EU03-1            | Alternative Operating Scenario (briquet drying)      | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Briquet Production (tons)  | PM = 0.5 lb/ton<br>PM <sub>10</sub> = 0.3 lb/ton<br>PM <sub>2.5</sub> = 0.21 lb/ton  | Not Required  | 72                                      |    |
|                   |  | VOC, NOx, SO <sub>2</sub> , CO  | <b>Actual Hours of Operation Under AOS Combusting Natural Gas (hr-opr)</b>   | VOC = 0.214 lb/hr-opr<br>NOx = 3.9 lb/hr-opr<br>SO <sub>2</sub> = 0.023 lb/hr-opr<br>CO = 3.28 lb/hr-opr   | Not Required  | 72                                      |    |
|                   |  | VOC, NOx, SO <sub>2</sub> , CO  | <b>Actual Hours of Operation Under AOS Combusting Propane (hr-opr)</b>   | <b>VOC = 0.35 lb/hr-opr<br/>NOx = 5.68 lb/hr-opr<br/>SO<sub>2</sub> = 0.66 lb/hr-opr<br/>CO = 3.28 lb/hr-opr</b>   | <b>Not Required</b>   | <b>72</b>                               |    |
| EU03-2            | Alternative Operating Scenario (ACC startup burners) | PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NOx, SO <sub>2</sub> , CO | <b>Actual Hours of Operation Under AOS Combusting Natural Gas (hr-opr)</b>   | PM/PM <sub>10</sub> /PM <sub>2.5</sub> = 0.522 lb/hr-opr<br>VOC = 0.377 lb/hr-opr<br>NOx = 6.34 lb/hr-opr<br>SO <sub>2</sub> = 0.041 lb/hr-opr<br>CO = 4.83 lb/hr-opr      | Not Required  | 72                                      |    |
|                   |  | PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NOx, SO <sub>2</sub> , CO | <b>Actual Hours of Operation Under AOS Combusting Propane (hr-opr)</b>   | <b>PM/PM<sub>10</sub>/PM<sub>2.5</sub> = 0.536 lb/hr-opr<br/>VOC = 0.61 lb/hr-opr<br/>NOx = 9.95 lb/hr-opr<br/>SO<sub>2</sub> = 1.15 lb/hr-opr<br/>CO = 5.74 lb/hr-opr</b> | <b>Not Required</b>   | <b>72</b>                               |    |
| EU04              | Briquet Cooling                                      | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Briquet Production (tons)  | PM = 0.29 lb/ton<br>PM <sub>10</sub> = 0.10 lb/ton<br>PM <sub>2.5</sub> = 0.050 lb/ton   | 78  | 72                                      |    |
| EU08              | Briquet Handling System                              | PM/PM <sub>10</sub> /PM <sub>2.5</sub>                                    | Actual Hours of Operation (hr-opr)   | 1.46 lb/hr-opr   | 78  | 72                                      |    |
| EU10              | <b>3.345 MMBtu/hr Boiler</b>                         | NOx, CO, VOC  | Natural Gas Combustion and Actual Hours of Operation (MMSCF and hr-opr)  | NOx = 0.328 lb/hr-opr<br>CO = 0.275 lb/hr-opr<br>VOC = 0.0180 lb/hr-opr  | Not Required  | 72                                      |    |

| Emissions Unit ID | Emission Unit                            | Pollutant    | Process Parameter Monitored  | Emission Factor (EF)  | EF Verification Testing Condition | Monitoring and Record Keeping Condition |
|-------------------|--|--------------|--|---|-----------------------------------|---|
|                   |  | NOx, CO, VOC | Propane Combustion and Actual Hours of Operation (MMSCF and hr-opr)    | NOx = 0.475 lb/hr-opr<br>CO = 0.274 lb/hr-opr<br>VOC = 0.0293 lb/hr-opr   | Not Required                      | 72                                      |
| EU11              | Solvent Treated Briquet (STB) Operations | VOC          | Amount of STB Produced (When ACC is Working and Not Working) (ton STB) | <u>Solvent Application:</u><br>2.82 lb/ton STB (when ACC <i>not</i> working)<br>0.14 lb/ton STB (when ACC working)<br><u>Solvent Handling:</u><br>1.31 tons/year (“fixed” storage tank and equipment losses)<br><u>Fines System:</u><br>2.02 lb/ton STB | Not Required                      | 72                                      |

JJW/cmw  
09/14/2020

**LANE REGIONAL AIR PROTECTION AGENCY (LRAPA)  
TITLE V OPERATING PERMIT**

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

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

ISSUED TO:

**Kingsford Manufacturing Company**  
3315 Marcola Road  
Springfield, Oregon 97478

INFORMATION RELIED UPON:

Application Number: 62995, 63946  
Received: July 17, 2017, April 5, 2018

PLANT SITE LOCATION:

3315 Marcola Road  
Springfield, Oregon 97478

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Springfield  
Dated: July 1, 1999

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

AUG 26 2019

Date

| <u>Nature of Business</u> | <u>SIC</u> | <u>NAICS</u> |
|---------------------------|------------|--------------|
| Charcoal Manufacturing    | 2861       | 325191       |

RESPONSIBLE OFFICIAL

Title: Plant Manager

FACILITY CONTACT PERSON

Name: Karen Chavez  
Title: Plant Engineer  
Phone: (541) 744-4558

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

|                  |   |                   |  |
|------------------|---|-------------------|--|
| ACDP             | Air Contaminant Discharge Permit                          | NO <sub>x</sub>   | Nitrogen oxides  |
| AQMA             | Air Quality Management Area                               | NSPS              | New Source Performance Standards                         |
| Act              | Federal Clean Air Act                                     | NSR               | New Source Review  |
| ASTM             | American Society of Testing and Materials                 | O <sub>2</sub>    | Oxygen   |
| Btu              | British thermal unit                                      | OAR               | Oregon Administrative Rules                              |
| CAM              | Compliance Assurance Monitoring                           | ODEQ              | Oregon Department of Environmental Quality               |
| CEMS             | Continuous Emissions Monitoring System                    | OPR               | Operation  |
| CFR              | Code of Federal Regulations                               | ORS               | Oregon Revised Statutes                                  |
| CI               | Compression Ignition                                      | O&M               | Operation and maintenance                                |
| CMS              | Continuous Monitoring System                              | Pb                | Lead   |
| CO               | Carbon Monoxide   | PCD               | Pollution Control Device                                 |
| CO <sub>2</sub>  | Carbon dioxide  | PM                | Particulate matter                                       |
| CO <sub>2e</sub> | Carbon dioxide equivalent                                 | PM <sub>2.5</sub> | Particulate matter less than 2.5 microns in size         |
| COMS             | Continuous Opacity Monitoring System                      | PM <sub>10</sub>  | Particulate matter less than 10 microns in size          |
| CPDS             | Certified Product Data Sheet                              | ppm               | Parts per million  |
| CPMS             | Continuous parameter monitoring system                    | PSEL              | Plant Site Emission Limit                                |
| DEQ              | Department of Environmental Quality                       | psia              | pounds per square inch, actual                           |
| dscf             | Dry standard cubic feet                                   | PTE               | Potential to Emit  |
| EF               | Emission factor   | RICE              | Reciprocating Internal Combustion Engine                 |
| EPA              | US Environmental Protection Agency                        | SACC              | Semi-Annual Compliance Certification                     |
| EU               | Emissions Unit  | SCEMP             | Surrogate Compliance Emissions Monitoring Parameter      |
| FCAA             | Federal Clean Air Act                                     | Scf               | Standard cubic foot                                      |
| ft <sup>2</sup>  | Square foot   | SER               | Significant emission rate                                |
| FSA              | Fuel sampling and analysis                                | SERP              | Source emissions reduction plan                          |
| GHG              | Greenhouse Gas  | SI                | Spark Ignition   |
| gr/dscf          | Grain per dry standard cubic feet (1 pound = 7000 grains) | SIC               | Standard Industrial Code                                 |
| HAP              | Hazardous Air Pollutant as defined by LRAPA Title 12      | SIP               | State Implementation Plan                                |
| HCFC             | Halogenated Chloro-Fluoro-Carbons                         | SO <sub>2</sub>   | Sulfur dioxide   |
| Hr               | Hour  | ST                | Source test  |
| ID               | Identification number or label                            | TACT              | Typically Achievable Control Technology                  |
| I&M              | Inspection and maintenance                                | TPY               | Tons per year  |
| Lb               | Pound   | VE                | Visible emissions  |
| LRAPA            | Lane Regional Air Protection Agency                       | VMT               | Vehicle miles traveled                                   |
| MACT             | Maximum Achievable Control Technology                     | VOC               | Volatile organic compounds                               |
| MM               | Million   | VHAP              | Volatile hazardous air pollutant                         |
| MMBtu            | Million British thermal units                             | Year              | A period consisting of any 12-consecutive calendar month |
| NA               | Not applicable  |                   |  |
| NESHAP           | National Emission Standards for Hazardous Air Pollutants  |                   |  |



**DEFINITIONS**

Modified EPA Method 9: As used in this permit “Modified EPA Method 9” is defined as follows: Opacity must be measured in accordance with EPA Method 9 using the data reduction procedures in EPA Method 203B. For all standards, the minimum observation period must be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. See also the definition of “Opacity” in LRAPA Title 12.

**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, 340-218-0120(2) and LRAPA 34-180]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA, and citizens under the Clean Air Act, except as specified below:
  - 2.a. Conditions 8, 9, 90.b.iv, G5, and G9 (LRAPA Title 43) are only enforceable by the state and/or 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)]:

| EU ID | Emission Unit Description                 | Pollution Control Device Description  | PCD ID |
|-------|---|---|--------|
| EU01  | Wood Fuel Receipt and Storage             | Tilt-Dump Controls <ul style="list-style-type: none"> <li>• Partial Enclosure with Negative Air</li> <li>• Baghouse</li> <li>• Water Spray</li> </ul> | NA     |
| EU02  | Hogfuel Sizing and Infeed System          | NA  | NA     |
| EU03  | Charring and Drying System:               |   |        |
|       | Wood Fuel Drying System                   | After Combustion Chamber  | 03-01C |
|       | Charcoal Manufacturing                    | After Combustion Chamber  | 03-01C |
|       | Briquet Dryers                            | NA  | NA     |
|       | ACC Natural Gas-Fired Burners for Startup | NA  | NA     |
| EU04  | Briquet Cooling                           | NA  | NA     |
| EU08  | Briquet Handling System:                  |   |        |
|       | Briquetting                               | Wet Scrubber  | 08-26C |
|       | Briquet Conveying                         | Small Vokes Dust Collector  | 08-27C |
|       |   | West Dust Collector   | 08-29C |
|       |   | East Dust Collector   | 08-30C |

| EU ID | Emission Unit Description                | Pollution Control Device Description   | PCD ID           |
|-------|--|--|------------------|
|       | Briquet Packaging                        | North Package Bin Vent Dust Collector<br>South Package Bin Vent Dust Collector | 08-41C<br>08-42C |
| EU10  | 3.345 MMBtu Natural Gas-Fired Boiler     | NA   | NA               |
| EU11  | Solvent Treated Briquet (STB) Operation  | ACC<br>West Dust Collector   | 03-01C<br>08-29C |
| EUAIA | Aggregate Insignificant Activities (AIA) | See Emission Detail Sheets   | NA               |

**ALTERNATIVE OPERATING SCENARIOS**

4. The permittee may also operate under the following two (2) alternative operating scenarios: [LRAPA 34-180 and OAR 340-218-0140(1)]
  - 4.a. EU03-1 ACC Shutdown Briquet Dryer Emissions – When the retort furnace and wood dryer systems in EU03 are shut down and no char is being produced, the source may operate an auxiliary natural gas burner to provide heat to the briquet dryers. [LRAPA 34-180 and OAR 340-218-0050(8)]
  - 4.b. EU03-2 ACC Burner Startup, Planned Shutdown, Scheduled Maintenance, or Malfunction Emissions – During retort furnace and wood dryer startups, when no char is being produced, the source may operate natural gas burners in the ACC to maintain minimum ACC combustion temperatures. [LRAPA 34-180 and OAR 218-0050(8)]
  - 4.c. The permittee must contemporaneously record changes from one alternative operating scenario to another. The record must be made available or submitted upon request by the LRAPA. [LRAPA 34-180 and OAR 340-218-0140(1)(c), 340-218-0050(8)(a)]

**GENERAL 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.

**Facility-Wide Requirements**

| Applicable Requirement | Condition Number | Pollutant/Parameter | Limit/Standard                 | Monitoring Method | Monitoring Condition |
|------------------------|------------------|---------------------|--------------------------------|-------------------|----------------------|
| 48-015                 | 5                | Fugitive emissions  | Minimize                       | Recordkeeping     | 6                    |
| 49-010(1) & 32-090(1)  | 8, 10            | Nuisance            | No nuisance                    | Recordkeeping     | 11                   |
| 32-055                 | 9                | PM >250 microns     | No fallout                     | Recordkeeping     | 11                   |
| 32-007                 | 13               | All                 | Prepare and implement I&M Plan | Recordkeeping     | 13                   |
| 40 CFR Part 68         | 14               | Risk management     | Risk management plan           | Recordkeeping     | 14                   |

**Fugitive Emissions**

5. Applicable Requirement: The permittee must 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. Such reasonable precautions must include, but not be limited to the following: [LRAPA 48-015(1)]

- 5.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - 5.b. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - 5.c. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - 5.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
  - 5.e. Adequate containment during sandblasting or other similar operations; and
  - 5.f. The covering of moving, open bodied trucks transporting materials likely to become airborne.
  - 5.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
6. **Monitoring Requirement:** At least quarterly for a minimum period of 30 minutes, the permittee must visually survey the plant using EPA Method 22 for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the general location on the plant site boundaries for more than 18 seconds in a six-minute period. The person conducting the observation must follow EPA Method 22. If sources of visible emissions are identified, the permittee must: [LRAPA 34-180, LRAPA 48-015(2)&(3) and OAR 340-218-0050(3)(a)]
- 6.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 5; or
  - 6.b. Develop an LRAPA-approved Fugitive Emission Control Plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period;
7. **Recordkeeping:** The permittee must maintain records of the fugitive emissions surveys and corrective actions, as applicable. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]

### **Nuisance Conditions**

8. **Applicable Requirement:** The permittee must not cause or allow air contaminants from any source to cause a nuisance. [LRAPA 49-010(1)] This condition is enforceable only by LRAPA.
9. **Applicable Requirement:** The permittee must not cause or permit the emission of 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. [LRAPA 32-055] This condition is enforceable only by LRAPA.
10. **Applicable Requirement:** The permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination to be made by LRAPA. [LRAPA 32-090(1)]
11. **Monitoring Requirement:** The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility.
12. **Recordkeeping Requirement:** Documentation required by Condition 11 must 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 must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible but no later than 5 business days. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]

**Inspection and Maintenance Plan**

13. Applicable Requirement: The permittee must review and update, as needed, the facility-wide Inspection and Maintenance Plan (I&M Plan). The permittee must submit the I&M Plan to LRAPA for review upon request. If LRAPA determines the plan is deficient, LRAPA may require the permittee to amend the plan. At a minimum, the I&M Plan must include inspection schedules for each control device. The I&M Plan must identify procedures for recording the date of each inspection, identification of each piece of equipment inspected, the results of each inspection, and the actions taken if repairs or maintenance are necessary. [LRAPA 32-007]

**Accidental Release Prevention**

14. Applicable Requirement: Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must 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. [40 CFR Part 68]

**INDIVIDUAL EMISSION-UNIT-SPECIFIC EMISSION LIMITS AND STANDARDS**

**Emissions Unit EU01 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant / Parameter | Limit/ Standard                               | Monitoring Requirement                | Monitoring Condition |
|------------------------|------------------|-----------------------|---|---------------------------------------|----------------------|
| 48-015(1)              | 5                | Fugitive emissions    | Minimize                                      | Periodic VE Observations              | 6                    |
| 32-010(1)-(3)          | 15               | Visible Emissions     | 20% opacity, 3-minute aggregate in 60 minutes | Periodic VE Observations              | 18                   |
| 32-015(2)(b)(B)        | 16               | PM                    | 0.14 gr/dscf                                  | Periodic VE Observations, Inspections | 18, 20               |
| 32-045(1)              | 17               | PM                    | Process Weight Limit                          | Periodic VE Observations, Inspections | 18, 20               |

15. Applicable Requirement: The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour from EU01. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and LRAPA 32-010(3)]
16. Applicable Requirement: The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU01 in excess of the following limits: 0.14 grains per dry standard cubic foot, for sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
17. Applicable Requirement: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from EU01 in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
18. Monitoring Requirement: At least monthly, the permittee must monitor the visible emissions from the non-fugitive emissions sources from EU01 by conducting a Modified EPA Method 9 test(s). Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 15 is documented, whichever period is shorter. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]

- 18.a. The Modified EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.
  - 18.b. If any test result exceeds the applicable standard in Condition 15, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable
  - 18.c. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.
19. Recordkeeping Requirement: The permittee must maintain records of all visible emissions monitoring, including: date, time, type of observation (EPA Method 22 or Modified EPA Method 9), observer, results, and any corrective actions taken. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
20. Monitoring Requirement: At least semiannually, the permittee must perform internal inspections of the tilt dump baghouse to ensure the control equipment is operating properly. [LRAPA 32-180 and OAR 340-218-0050(3)(a)]
21. Recordkeeping Requirement: The permittee must keep records for each inspection of the tilt dump baghouse, including: date, inspector’s name, a list of the items inspected, and the results of the inspection, including any maintenance or repairs performed as a result of the inspection. [LRAPA 32-180 and OAR 340-218-0050(3)(b)]

**Emissions Unit EU02 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant / Parameter | Limit/ Standard | Monitoring Requirement | Monitoring Condition |
|------------------------|------------------|-----------------------|-----------------|------------------------|----------------------|
| 48-015(1)              | 5                | Fugitive emissions    | Minimize        | Recordkeeping          | 6                    |

**Emissions Unit EU03 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant / Parameter | Limit/ Standard                               | Monitoring Requirement        | Monitoring Condition |
|------------------------|------------------|-----------------------|---|-------------------------------|----------------------|
| 32-010(1)-(3)          | 22               | Visible Emissions     | 20% opacity, 3-minute aggregate in 60 minutes | Periodic VE Observations      | 23, 26               |
| 33-065                 | 25               | PM                    | 10.0 lbs/ton                                  | Compliance Testing, CAM       | 25.a., 26            |
| 40 CFR 241.3           | 27               | Hog fuel              | Biomass                                       | Recordkeeping                 | 28                   |
| 32-015(2)*             | 29               | PM                    | 0.10 gr/dscf                                  | Periodic VE Observations, CAM | 23, 26               |
| 32-045(1)              | 30               | PM                    | Process Weight Limit: 32-8010                 | Periodic VE Observations, CAM | 23, 26               |

\*Note: This requirement applies during the alternative operating scenario EU03-1.

22. Applicable Requirement: The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour from EU03. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and LRAPA 32-010(3)]

23. **Monitoring Requirement:** At least daily, the permittee must monitor the visible emissions from the ACC and Dryer 1 Wet Exhaust from EU03 by conducting a Modified EPA Method 9 test. Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 22 is documented, whichever period is shorter. [LRAPA 34-180, OAR 340-218-0050(3)(a) and 40 CFR Part 64.3]
- 23.a. The Modified EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.
- 23.b. If any test result exceeds the applicable standard in Condition 22, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable
- 23.c. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.
24. **Recordkeeping Requirement:** The permittee must maintain records of all visible emissions monitoring, including: date, time, type of observation (EPA Method 22 or Modified EPA Method 9), observer, results, and any corrective actions taken. The permittee must also record when the monitoring required by Condition 23 is performed during an alternative operating scenario. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
25. **Applicable Requirement:** The permittee must not cause or permit the emission of particulate matter from charcoal producing plant sources including, but not limited to, charcoal furnaces (retorts), heat recovery boilers, after combustion chambers, and wood dryers using any portion of the charcoal furnace off-gases as a heat source, in excess of a total from all sources within the plant site of 10.0 pounds per ton of charcoal produced (as determined from the retort process) as an annual average. Emissions from char storage, briquette making (excluding dryers using furnace off-gases), boilers not using charcoal furnace off-gases, and fugitive sources are excluded in determining compliance with this emission limit. [LRAPA 33-065(1) & (2)]
- 25.a. **Testing Requirement:** Between January 1, 2023 and December 31, 2023, the permittee must test EU03 at least once to determine the type, quantity, quality and duration of emissions, and process parameters affecting emissions, in conformance with test methods on file with LRAPA. If this test exceeds the annual emission limitation, then three (3) additional tests are required at 3-month intervals with all four (4) tests being averaged to determine compliance with the annual standard. No single test may be greater than twice the annual average emission limitation. [LRAPA 33-065(5)]
26. **Monitoring and Recordkeeping Requirement:** The permittee must demonstrate compliance with CAM for PM, VOC, and CO, from the EU03 charring and drying system by implementing the following: [LRAPA 34-180, OAR 240-218-0050(3)(a)&(b) and 40 CFR 64.3(b)(4)(iii)]
- 26.a. The permittee must maintain an operating temperature of at least a 1400°F in the ACC on the retort furnace, except during startup, shutdown or maintenance. The ACC operating temperature must be continuously monitored in the outlet of the ACC combustion chamber, and recorded automatically on a strip chart or data acquisition system. Corrective action must be taken within 10 minutes if the ACC operating temperature falls below 1500°F, except during startup, shutdown or maintenance. Corrective actions include, but are not limited to, turning on auxiliary natural gas burners to provide additional heat.
- 26.b. The permittee must maintain a record of the ACC operating temperatures, any ACC temperature excursions (i.e., noted hourly average temperatures that fall below 1500°F), and a log of corrective action for the monitoring described in Condition 26.a.

- 26.c. The permittee must conduct inspections of the ACC to ensure proper operation of the oxidizer. These include, but are not limited to, periodic inspections of the burner assemblies, blowers, refractory lining, oxidizer shell, fuel lines, and ductwork.
  - 26.d. The permittee must continuously monitor the temperature in the retort furnace cyclones and maintain the temperature above 150°F during normal operations (not including periods of system startup, shutdown, or maintenance).
  - 26.e. If the temperature falls below 150°F in one of the retort furnace cyclones during normal operations, the permittee must investigate and take corrective actions to unplug the cyclone while the system continues to operate.
  - 26.f. If the temperature falls below 150°F in both retort furnace cyclones during normal operations, the permittee must investigate and take corrective actions to unplug both cyclones while the system continues to operate. If at least one of the cyclone's temperatures cannot be raised above 150°F, the retort furnace must be shut down until the problem causing the low temperature is resolved.
  - 26.g. The permittee must record all temperature monitoring of the retort furnace cyclones, cyclone temperature excursions (i.e., temperature readings that are below 150°F), and corrective actions taken in a log for monitoring pertaining to Condition 26.c.
  - 26.h. The permittee must monitor the hogfuel dryer cyclone bin level indicator hourly. If a "High Level" is shown on the indicator, the permittee must investigate and verify that a problem exists. In the event of a problem, the permittee must take corrective actions to resolve the problem.
  - 26.i. The permittee must record all bin level monitoring of the hogfuel dryer cyclone, "High Level" indications, and corrective actions taken in a log for monitoring pertaining to Condition 26.h.
  - 26.j. The permittee must monitor the operation of the rotary valve at the discharge of the hogfuel dryer cyclone hourly. If the valve will not rotate properly, the permittee must investigate and take corrective actions to ensure proper discharge of the cyclone.
  - 26.k. The permittee must record all monitoring of the hogfuel dryer cyclone, rotary valve problems, and corrective actions taken in a log for monitoring pertaining to Condition 26.i.
27. Hog Fuel Limitations: The permittee may only pyrolyze clean cellulosic biomass in the EU03 charring and drying system. This condition only applies to the biomass that is processed in the wood dryer and retort furnace. *Clean cellulosic biomass* is defined in 40 CFR 241.2 means those residuals that are akin to traditional cellulosic biomass, including, but not limited to: Agricultural and forest-derived biomass (e.g., green wood, forest thinnings, clean and unadulterated bark, sawdust, trim, tree harvesting residuals from logging and sawmill materials, hogged fuel, wood pellets, untreated wood pallets); urban wood (e.g., tree trimmings, stumps, and related forest-derived biomass from urban settings); corn stover and other biomass crops used specifically for the production of cellulosic biofuels (e.g., energy cane, other fast growing grasses, byproducts of ethanol natural fermentation processes); bagasse and other crop residues (e.g., peanut shells, vines, orchard trees, hulls, seeds, spent grains, cotton byproducts, corn and peanut production residues, rice milling and grain elevator operation residues); wood collected from forest fire clearance activities, trees and clean wood found in disaster debris, clean biomass from land clearing operations, and clean construction and demolition. These fuels are not secondary materials or solid wastes unless discarded. Clean biomass is biomass that does not contain contaminants at concentrations not normally associated with virgin biomass materials. [LRAPA 32-007(1)]
28. Recordkeeping Requirement: The permittee must keep daily records of the amount of clean cellulosic biomass received by the facility, in tons. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
29. Applicable Requirement: The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU03 in excess of the following limits: 0.10 grains per dry standard cubic foot, for sources installed, constructed or modified after April 16, 2015. [LRAPA 32-030(2)]
- 29.a. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Condition 29 by performing the compliance monitoring required by Conditions 23 and 26. [LRAPA 32-180 and OAR 340-218-0050(3)(a)&(b)]

30. Applicable Requirement: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from EU03 in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
- 30.a. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Condition 30 by performing the compliance monitoring required by Conditions 23 and 26. [LRAPA 32-180 and OAR 340-218-0050(3)(a)&(b)]

**Emissions Unit EU04 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant / Parameter | Limit / Standard                              | Monitoring Requirement                       | Monitoring Condition |
|------------------------|------------------|-----------------------|---|--|----------------------|
| 32-010(1)-(3)          | 31               | Visible Emissions     | 20% opacity, 3-minute aggregate in 60 minutes | Periodic VE Observations                     | 34                   |
| 32-015(2)(b)(A)        | 32               | PM                    | 0.10 gr/dscf                                  | Periodic VE Observations, Compliance Testing | 32.a., 34            |
| 32-045                 | 33               | PM                    | Process Weight Limit                          | Periodic VE Observations                     | 34                   |

31. Applicable Requirement: The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour from EU04. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and LRAPA 32-010(3)]
32. Applicable Requirement: The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU04 in excess of the following limits: 0.10 grains per dry standard cubic foot, for sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which all representative compliance source test results prior to April 16, 2015 demonstrate emissions no greater than 0.080 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)(A)]
- 32.a. Testing Requirement: The permittee must use the emission verification testing required by Condition 78 to verify that the grain loading limit of 0.10 gr/dscf is not being exceeded. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
33. Applicable Requirement: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from EU04 in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
34. Monitoring Requirement: At least monthly, the permittee must monitor the visible emissions from emissions unit EU04 by conducting a Modified EPA Method 9 test. Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 31 is documented, whichever period is shorter. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
- 34.a. The Modified EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.
- 34.b. If any test result exceeds the applicable standard in Condition 31, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable
- 34.c. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day



during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.

35. **Recordkeeping Requirement:** The permittee must maintain records of all visible emissions monitoring, including: date, time, type of observation (EPA Method 22 or Modified EPA Method 9), observer, results, and any corrective actions taken. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]

**Emissions Unit EU08 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant / Parameter | Limit / Standard                              | Monitoring Requirement   | Monitoring Condition |
|------------------------|------------------|-----------------------|---|--------------------------|----------------------|
| 32-010(1)-(3)          | 36               | Visible Emissions     | 20% opacity, 3-minute aggregate in 60 minutes | Periodic VE Observations | 37                   |
| 32-015(2)(b)(A)        | 39               | PM                    | 0.10 gr/dscf                                  | Compliance Testing, CAM  | 39.a., 41            |
| 32-045(1)              | 40               | PM                    | Process Weight Limit                          | CAM                      | 41                   |

36. **Applicable Requirement:** The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour from EU08. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) & (3)]
37. **Monitoring Requirement:** At least quarterly, the permittee must monitor the visible emissions from EU08 by conducting a Modified EPA Method 9 test(s). Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 36 is documented, whichever period is shorter. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
- 37.a. The Modified EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.
- 37.b. If any test result exceeds the applicable standard in Condition 36, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable
- 37.c. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.
38. **Recordkeeping Requirement:** The permittee must maintain records of all visible emissions monitoring, including: date, time, type of observation (EPA Method 22 or Modified EPA Method 9), observer, results, and any corrective actions taken. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
39. **Applicable Requirement:** The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU08 in excess of the following limits: 0.10 grains per dry standard cubic foot, for sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which all representative compliance source test results prior to April 16, 2015 demonstrate emissions no greater than 0.080 grains per dry standard cubic foot. [LRAPA 32-015(2)(b)(A)]
- 39.a. **Testing Requirement:** The permittee must use the emission verification testing required by Condition 78 to verify that the grain loading limit of 0.10 gr/dscf is not being exceeded. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]

40. **Applicable Requirement:** The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from EU08 in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]
41. **Monitoring Requirement:** In order to demonstrate continuous compliance with the PM grain loading and process weight limits in Conditions 39 and 40, the permittee must operate each baghouse used to control PM emissions from EU08 such that the pressure drop across any baghouse is not less than 1.0 inches nor greater than 8.0 inches of water column. The permittee must use the following compliance assurance methods: [LRAPA 34-180, OAR 340-218-0050(3)(a) and 40 CFR 64.3 (b)(4)(iii)]
- 41.a. Once each day, the permittee must confirm that water is circulating through the wet scrubber.
- 41.b. Once each day, the permittee must monitor the pressure drop across the baghouses used to control PM emissions from EU08.
- 41.c. Once each quarter, the permittee must inspect the baghouses used to control PM emissions from EU08 for wear, plugging, abrasion, and integrity of mechanical and ancillary systems.
- 41.d. The permittee must take corrective action to return to the highest reasonable efficiency and effectiveness, all air pollution control equipment and emission reduction processes that the regular inspections show to be operating at less than an optimum level or that the parametric monitoring shows deviations from the approved parameter action levels. The exceedance of a parameter action level must not itself be considered a violation of the emission limits in Conditions 39 and 40. [LRAPA 32-007]
42. **Recordkeeping Requirement:** The permittee must record all inspections, maintenance, parameter action level range exceedances, and corrective actions taken in a maintenance log for monitoring pertaining to Condition 41. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]

**Emissions Unit EU10 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant / Parameter | Limit / Standard                              | Monitoring Requirement   | Monitoring Condition |
|------------------------|------------------|-----------------------|---|--------------------------|----------------------|
| 32-010(1)-(3)          | 43               | Visible Emissions     | 20% opacity, 3-minute aggregate in 60 minutes | Periodic VE Observations | 45                   |
| 32-030(1)(b) & (3)(b)  | 44               | PM                    | 0.14 gr/dscf adjusted to 50% excess air       | Periodic VE Observations | 45                   |

43. **Applicable Requirement:** The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour from EU10. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and LRAPA 32-010(3)]
44. **Applicable Requirement:** The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU10 in excess of the following limits: 0.14 grains per dry standard cubic foot, for fuel burning sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air. [LRAPA 32-030(1)(b) and LRAPA 32-030(3)(b)]
45. **Monitoring Requirement:** At least quarterly, the permittee must monitor the visible emissions from EU10 by conducting a Modified EPA Method 9 test(s). Each Modified EPA Method 9 test must be a minimum of 6 minutes long unless any one reading is greater than 20% opacity, then the observation period must be 60 minutes or until a violation of the applicable standard in Condition 43 is documented, whichever period is shorter. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]

- 45.a. The Modified EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.
  - 45.b. If any test result exceeds the applicable standard in Condition 43, the permittee must initiate corrective action within 1-hour to bring the unit into compliance with the applicable standards. Upon completion of the corrective actions, a Modified EPA Method 9 test must be conducted as soon as practicable
  - 45.c. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.
46. Recordkeeping Requirement: The permittee must maintain records of all visible emissions monitoring, including: date, time, type of observation (EPA Method 22 or Modified EPA Method 9), observer, results, and any corrective actions taken. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]

**Emissions Unit EU11 Specific Emission Limits and Standards**

| Applicable Requirement | Condition Number | Pollutant/Parameter | Limit/Standard                                | Monitoring Requirement                            | Monitoring Condition |
|------------------------|------------------|---------------------|---|---|----------------------|
| 32-010(1)-(3)          | 47               | Visible Emissions   | 20% opacity, 3-minute aggregate in 60 minutes | Periodic VE Observations                          | 48                   |
| 32-015(2)(b)(B)        | 49               | PM                  | 0.14 gr/dscf                                  | Periodic VE Observations                          | 51                   |
| 32-045(1)              | 50               | PM                  | Process Weight Limit                          | Periodic VE Observations, and Material Throughput | 51                   |
| 32-008(2)              | 52               | VOC                 | TACT  | Periodic VE Observations                          | 53                   |
|                        |                  |                     |   | Temperature                                       | 54                   |
|                        |                  |                     |   | Flow Testing                                      | 55                   |

47. Applicable Requirement: The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour from EU11. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1) and LRAPA 32-010(3)]
48. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Condition 47 by performing the compliance monitoring required by Conditions 23 and 37, and the recordkeeping required by Conditions 24 and 38. [LRAPA 34-180 and OAR 340-218-0050(3)(a)&(b)]
49. Applicable Requirement: The permittee must not cause, suffer, allow, or permit particulate matter emissions from EU11 in excess of the following limits: 0.14 grains per dry standard cubic foot, for sources installed, constructed or modified on or after June 1, 1970 but prior to April 16, 2015 for which there are no representative compliance source test results. [LRAPA 32-015(2)(b)(B)]
50. Applicable Requirement: The permittee must not cause, suffer, allow or permit the emissions of particulate matter in any one (1) hour from EU11 in excess of the amount shown in LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045]
51. Monitoring and Recordkeeping Requirements: The permittee must demonstrate compliance with Conditions 49 and 50 by performing the compliance monitoring and recordkeeping required by Conditions 26 and 41. [LRAPA 34-180 and OAR 340-218-0050(3)(a)&(b)]

52. **Applicable Requirement:** The permittee must operate EU11 Solvent Treated Briquet Operations according to the following procedures. [LRAPA 32-008(2) and 40 CFR 64.3(b)(4)(iii)]
- 52.a. Solvent must be transferred to the surge tank in the railcar unloading building only by submerged filling.
  - 52.b. All solvent used during briquet treatment operation must be cooled to below 50°F, as a daily average value, before being pumped into the dip tank.
  - 52.c. Solvent must be added to the dip tank only by submerged filling.
  - 52.d. The permittee must perform prescreening of briquets prior to solvent application in order to minimize the production of solvent-coated fines.
  - 52.e. During solvent treated briquet operation, the permittee must collect the solvent vapors generated in the briquet treatment area and must exhaust the collected solvent vapors to the ACC serving the charcoal retort furnace. The collection of the solvent vapors must satisfy the following enclosure requirements:
    - 52.e.i. The total area of all natural draft openings must not exceed 5% of the total surface area of the total enclosure's walls, floor, and ceiling.
    - 52.e.ii. The air passing through all natural draft openings must flow into the enclosure continuously.
  - 52.f. The temperature within the combustion zone of the ACC must be maintained at 1400°F and must achieve at least 95% destruction of the VOC generated by the solvent treated briquet operation.
  - 52.g. In the event that the ACC is not available, solvent vapors collected from the briquet treatment area may be discharged uncontrolled to the atmosphere. Uncontrolled atmospheric discharge of solvent vapors must not exceed eight (8) hours in one (1) calendar day nor 280 hours in one (1) calendar year.
  - 52.h. Solvent may be applied to briquets using the dip tank and/or a curtain coater system.
53. **Monitoring Requirement:** The permittee must perform monthly visual inspections of solvent handling equipment and promptly repair any leaks that are found. [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
- 53.a. **Recordkeeping Requirement:** The permittee must record all inspections and repairs pursuant to Condition 53. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
54. **Monitoring Requirement:** In addition to the monitoring required by Condition 26, the permittee must measure the temperature on the line to the EU11 Solvent Treated Briquet Operations dip tank once each day while the STB operation is in use. [LRAPA 34-180, OAR 340-218-0050(3)(a) and 40 CFR 64.3(b)(4)(iii)]
- 54.a. **Recordkeeping Requirement:** For each month, the permittee must calculate the daily average temperature on the line to the STB dip tank. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
55. **Monitoring Requirement:** Once during the permit term, the permittee must perform the following: [LRAPA 34-180 and OAR 340-218-0050(3)(a)]
- 55.a. Use a sampling method approved by LRAPA to measure the flow through each natural draft opening, and record whether the flow is outflow or inflow. Volumetric flow rates must be calculated without the adjustment normally made for moisture content; and
  - 55.b. Determine the average inward face velocity using the following equation:

$$FV = \left[ \sum Q_o - \sum Q_i \right] / \left[ \sum A_t \right]$$

where:

FV\* = average inward face velocity (ft/min). A negative value for FV indicates overall inward flow;

$\sum$  = symbol representing "summation of";

$\sum Q_o$  = sum of the outflows (ft<sup>3</sup>/min);

$\sum Q_i$  = sum of the inflows (ft<sup>3</sup>/min); and

$\sum A_t$  = total face area of all natural draft openings, as determined through the methods in Condition 46.e.

Show that the average inward face velocity is greater than 500 feet per minute (9000 meters per hour);

or

- 55.c. Perform continuous observation using smoke tubes, streamers, tracer gases, or other means approved by LRAPA over the period that the volumetric flow rate tests in Condition 55 are carried out.
56. Recordkeeping Requirement: The permittee must record the results of the monitoring completed pursuant to Condition 55. [LRAPA 34-180 and OAR 340-218-0050(3)(b)]
57. Recordkeeping Requirement: The permittee must maintain records of material stored in EU11 Solvent Treated Briquet Operations, which must include a description of the material(s), dimensions of storage vessel(s), and capacity of storage vessel(s). [LRAPA 34-180 and OAR 340-218-0050(3)(b)]

### **Insignificant Activities Requirements**

58. Applicable Requirement: LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in LRAPA Title 12 exist at facilities required to obtain an LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 58.a. 32-010(3) – 20% opacity for a period or periods aggregating more than three (3) minutes in any hour for sources other than wood fired boilers.
- 58.b. 32-015(2)(b)(B) – 0.14 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified on or after June 1, 1970 but prior to April 16, 2015 if there are no representative compliance source tests.
- 58.c. 32-015(2)(c) – 0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed, constructed, or modified after April 16, 2015.
- 58.d. 32-030(1)(b)&(3)(b) – 0.14 gr/dscf for fuel burning equipment sources installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015 if there are no representative compliance source tests. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
- 58.e. 32-030(1)(a)&(3)(b) – 0.10 gr/dscf for fuel burning equipment sources installed, constructed, or modified after April 16, 2015. For fuel burning equipment that burns fuels other than wood, the emission results are corrected to 50% excess air.
- 58.f. 32-045 – process weight limit for non-fugitive, non-fuel burning process equipment.
59. 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 Title 12 and perform the testing in accordance with the DEQ’s *Source Sampling Manual*.

Categorically Insignificant Activity – 274 kW Natural Gas-Fired Emergency RICE

40 CFR 63 Subpart ZZZZ – National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines

60. Applicable Requirement: *Work Practice Requirements* – The permittee must comply with the following requirements as stated in 40 CFR 63 Subpart ZZZZ – Table 2d: [40 CFR 63.6603(a), 40 CFR 63 Subpart ZZZZ - Table 2d]
- 60.a. Change oil and filter every 500 hours of operation or annually, whichever comes first, or utilize an oil analysis program pursuant to Condition 61 to extend the specified oil change requirement;

- 60.b. Inspect spark plugs every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; and
- 60.c. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary.
61. Applicable Requirement: The permittee has the option of utilizing an oil analysis program in order to extend the specified oil change requirement in Condition 60. The oil analysis must be performed at the same frequency specified for changing the oil in Condition 60. The analysis program must at a minimum analyze the following three parameters: Total Acid Number, viscosity, and percent water content. The condemning limits for these parameters are as follows: Total Acid Number increases by more than 3.0 milligrams of potassium hydroxide (KOH) per gram from Total Acid Number of the oil when new; viscosity of the oil has changed by more than 20 percent from the viscosity of the oil when new; or percent water content (by volume) is greater than 0.5. If all of these condemning limits are not exceeded, the engine owner or operator is not required to change the oil. If any of the limits are exceeded, the permittee must change the oil within two (2) business days of receiving the results of the analysis; if the engine is not in operation when the results of the analysis are received, the permittee must change the oil within two (2) business days or before commencing operation, whichever is later. The permittee must keep records of the parameters that are analyzed as part of the program, the results of the analysis, and the oil changes for the engine. The analysis program must be part of the maintenance plan for the engine. [40 CFR 63.6625(j)]
62. Applicable Requirement: If an emergency engine is operating during an emergency and it is not possible to shut down the engine in order to perform the work practice requirements on the schedule required in Conditions 60. through 60.b, or if performing the work practice on the required schedule would otherwise pose an unacceptable risk under federal, state, or local law, the work practice can be delayed until the emergency is over or the unacceptable risk under federal, state, or local law has abated. The work practice should be performed as soon as practicable after the emergency has ended or the unacceptable risk under federal, state, or local law has abated. Sources must report any failure to perform the work practice on the schedule required and the federal, state or local law under which the risk was deemed unacceptable. [40 CFR 63.6603(a), 40 CFR 63 Subpart ZZZZ - Table 2d]
63. Applicable Requirement: During periods of startup the permittee must minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes. [40 CFR 63.6625(h)]
64. Monitoring Requirement: The permittee must operate and maintain the stationary RICE according to the manufacturer's emission-related written instructions or develop their 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. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by this standard have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the LRAPA which may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.6605(b)]
65. Monitoring Requirement: The permittee must operate the emergency stationary RICE according to the requirements in Conditions 65.a. through b. In order for the engine to be considered an emergency stationary RICE under 40 CFR 63, subpart ZZZZ, any operation other than emergency operation and maintenance and testing, as described in Conditions 65.a. through b., is prohibited. If the permittee does not operate the engine according to the requirements in Conditions 65.a. through b., the engine will not be considered an emergency engine under this subpart and must meet all requirements for non-emergency engines. [40 CFR 63.6640(f)]
- 65.a. There is no time limit on the use of emergency stationary RICE in emergency situations. [40 CFR 63.6640(f)(1)]
- 65.b. The permittee may operate the emergency stationary RICE for any combination of the purposes

specified in Condition 65.b.i. for a maximum of 100 hours per calendar year. [40 CFR 63.6640(f)(2)]  
65.b.i. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition LRAPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the owner or operator maintains records indicating that federal, state, or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year. [40 CFR 63.6640(f)(2)(i)]

66. Recordkeeping Requirement: The permittee must keep the following records: [40 CFR 63.6655(a)]
- 66.a. A copy of each notification and report that the permittee submitted to comply with 40 CFR 63 Subpart ZZZZ, including all documentation supporting any Initial Notification or Notification of Compliance Status that the permittee submitted, according to the requirement in 40 CFR 63.10(b)(2)(xiv). [40 CFR 63.6655(f)(1)]
  - 66.b. Records of the occurrence and duration of each malfunction of operation (*i.e.*, process equipment). [40 CFR 63.6655(f)(2)]
  - 66.c. Records of actions taken during periods of malfunction to minimize emissions in accordance with §63.6605(b), including corrective actions to restore malfunctioning process equipment to its normal or usual manner of operation. [40 CFR 63.6655(f)(5)]
67. Recordkeeping Requirement: The permittee must keep the records required in Table 6 of 40 CFR 63 Subpart ZZZZ to show continuous compliance with each emission or operating limitation that applies to them. [40 CFR 63.6655(d)]
68. Recordkeeping Requirement: The permittee must keep records of the maintenance conducted on the stationary RICE in order to demonstrate that the permittee operated and maintained the stationary RICE according to their own maintenance plan. [40 CFR 63.6655(e)]
69. Recordkeeping Requirement: The permittee must keep records of the hours of operation of the engine that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. [40 CFR 63.6655(f)]
70. Recordkeeping Requirement: In what form and how long must the permittee keep their records?
- 70.a. The permittee's records must be in a form suitable and readily available for expeditious review according to 40 CFR §63.10(b)(1).
  - 70.b. As specified in 40 CFR §63.10(b)(1), the permittee must keep each record for five (5) years following the date of each occurrence, measurement, maintenance, corrective action, report, or record.
  - 70.c. The permittee must keep each record readily accessible in hard copy or electronic form for at least five (5) years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to 40 CFR §63.10(b)(1).  
[40 CFR 66.6660]

## **PLANT SITE EMISSION LIMITS**

71. Applicable Requirement: The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040, 42-0041]

| Pollutant               | Plant Site Emission Limit (TPY) | Unassigned Emissions (TPY) | Emission Reduction Credit (TPY) |
|-------------------------|---------------------------------|----------------------------|---------------------------------|
| PM                      | 164                             | 134                        | 0                               |
| PM <sub>10</sub>        | 103                             | 77                         | 0                               |
| PM <sub>2.5</sub>       | 96                              | 51                         | 0                               |
| SO <sub>2</sub>         | 39                              | 0                          | 0                               |
| NO <sub>x</sub>         | 103                             | 227                        | 0                               |
| CO                      | 99                              | 0                          | 0                               |
| VOC                     | 96                              | 0                          | 0                               |
| GHG (CO <sub>2</sub> e) | 214,233                         | 0                          | 0                               |

**Plant Site Emission Limits Monitoring**

72. Recordkeeping and Monitoring Requirements: [OAR 340-218-0050(3)]
- 72.a. **By the 15<sup>th</sup> of each month**, the permittee must determine compliance with the Plant Site Emission Limits (PSELs) established in Condition 71 of this permit by conducting the monitoring in the following table. [OAR 340-218-0050(3)(a)]
  - 72.b. Emissions calculations must be performed each month for the preceding 12 consecutive calendar months.
  - 72.c. Compliance with PSELs, except GHGs, must be determined using the calculations contained in Condition 73 using the monitored parameters recorded during the reporting period and the emission factors contained in the following table (PSEL Process Monitoring and Emission Factors), unless the permittee elects to pay emission fees based on actual emissions using a verified emission factor determined in accordance with OAR 340-220-0170. If the permittee is paying on actual emissions based on a verified emission factor, the verified emission factor must be used for determining compliance with the PSEL in accordance with Condition 80.
  - 72.d. The emissions factors listed in the following table (PSEL Process Monitoring and Emission Factors) are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs, except GHGs, must only be determined by the calculations contained in Condition 73.

**PSEL Process Monitoring and Emission Factors**

| Emissions Unit ID | Emission Unit                  | Pollutant                                | Process Parameter Monitored  | Emission Factor (EF)  |   | EF Verification Testing Condition | Monitoring and Record Keeping Condition |
|-------------------|--------------------------------|--|--|---|---|-----------------------------------|---|
| EU01              | Wood Receipt and Storage       | PM, PM <sub>10</sub> , PM <sub>2.5</sub> | Wood Throughput (dry tons)   | PM = 0.10 lb/dry ton<br>PM <sub>10</sub> = 0.05 lb/dry ton<br>PM <sub>2.5</sub> = 0.01 lb/dry ton |   | Not Required                      | 72                                      |
| EU02              | Hogfuel Sizing & Infeed System | PM, PM <sub>10</sub> , PM <sub>2.5</sub> | Actual Hours of Operation for Screener In, Screener Out, Secondary Screen In, Secondary Screen Out, and Reject Diverter (hr-opr) | Screener In:  | PM = 0.096 lb/hr-opr<br>PM <sub>10</sub> = 0.048 lb/hr-opr<br>PM <sub>2.5</sub> = 0.003 lb/hr-opr   | Not Required                      | 72                                      |
|                   |                                |  |  | Screener Out:   | PM = 0.0192 lb/hr-opr<br>PM <sub>10</sub> = 0.01 lb/hr-opr<br>PM <sub>2.5</sub> = 0.001 lb/hr-opr   |                                   |   |
|                   |                                |  |  | Secondary Screen In:  | PM = 0.0192 lb/hr-opr<br>PM <sub>10</sub> = 0.01 lb/hr-opr<br>PM <sub>2.5</sub> = 0.001 lb/hr-opr   |                                   |   |
|                   |                                |  |  | Secondary Screen Out:   | PM = 0.0048 lb/hr-opr<br>PM <sub>10</sub> = 0.002 lb/hr-opr<br>PM <sub>2.5</sub> = 0.0002 lb/hr-opr |                                   |   |



| Emissions Unit ID | Emission Unit  | Pollutant   | Process Parameter Monitored   | Emission Factor (EF)  |              | EF Verification Testing Condition | Monitoring and Record Keeping Condition |
|-------------------|--|---|---|---|--------------|-----------------------------------|---|
|                   |  |   |   | Reject Diverter:  |              |                                   |   |
|                   |  |   |   | PM = 0.0192 lb/hr-opr<br>PM <sub>10</sub> = 0.01 lb/hr-opr<br>PM <sub>2.5</sub> = 0.001 lb/hr-opr   |              |                                   |   |
| EU03              | Charring and Drying System                           | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Char Production (tons)  | PM = 5.12 lb/ton<br>PM <sub>10</sub> = 3.43 lb/ton<br>PM <sub>2.5</sub> = 3.43 lb/ton   | 76           | 72                                |   |
|                   |  | VOC, NOx, SO <sub>2</sub> , CO  | Char Production (tons)  | VOC = 0.3 lb/ton<br>NOx = 3.9 lb/ton<br>SO <sub>2</sub> = 0.5 lb/ton<br>CO = 0.85 lb/ton  | 77           | 72                                |   |
| EU03-1            | Alternative Operating Scenario (briquet drying)      | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Briquet Production (tons)   | PM = 0.5 lb/ton<br>PM <sub>10</sub> = 0.3 lb/ton<br>PM <sub>2.5</sub> = 0.21 lb/ton   | Not Required | 72                                |   |
|                   |  | VOC, NOx, SO <sub>2</sub> , CO  | Actual Hours of Operation Under Alternative Operating Scenario (hr-opr) | VOC = 0.214 lb/hr-opr<br>NOx = 3.9 lb/hr-opr<br>SO <sub>2</sub> = 0.023 lb/hr-opr<br>CO = 3.28 lb/hr-opr  | Not Required | 72                                |   |
| EU03-2            | Alternative Operating Scenario (ACC startup burners) | PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC, NOx, SO <sub>2</sub> , CO | Actual Hours of Operation Under Alternative Operating Scenario (hr-opr) | PM/PM <sub>10</sub> /PM <sub>2.5</sub> = 0.522 lb/hr-opr<br>VOC = 0.377 lb/hr-opr<br>NOx = 6.34 lb/hr-opr<br>SO <sub>2</sub> = 0.041 lb/hr-opr<br>CO = 4.83 lb/hr-opr   | Not Required | 72                                |   |
| EU04              | Briquet Cooling                                      | PM, PM <sub>10</sub> , PM <sub>2.5</sub>                                  | Briquet Production (tons)   | PM = 0.29 lb/ton<br>PM <sub>10</sub> = 0.10 lb/ton<br>PM <sub>2.5</sub> = 0.050 lb/ton  | 78           | 72                                |   |
| EU08              | Briquet Handling System                              | PM/PM <sub>10</sub> /PM <sub>2.5</sub>                                    | Actual Hours of Operation (hr-opr)                                      | 1.46 lb/hr-opr  | 78           | 72                                |   |
| EU10              | Combustion Unit                                      | NOx, CO, VOC  | Natural Gas Combustion and Actual Hours of Operation (MMSCF and hr-opr) | NOx = 0.328 lb/hr-opr<br>CO = 0.275 lb/hr-opr<br>VOC = 0.0180 lb/hr-opr   | Not Required | 72                                |   |
| EU11              | Solvent Treated Briquet (STB) Operations             | VOC   | Amount of STB Produced (When ACC is Working and Not Working) (ton STB)  | <u>Solvent Application:</u><br>2.82 lb/ton STB (when ACC <i>not</i> working)<br>0.14 lb/ton STB (when ACC working)<br><u>Solvent Handling:</u><br>1.31 tons/year (“fixed” storage tank and equipment losses)<br><u>Fines System:</u><br>2.02 lb/ton STB | Not Required | 72                                |   |

73. The permittee must determine compliance with the PSELS, except GHGs, by calculating emissions for each emissions unit using the following formula, process parameters measured in Condition 72.c., and the emission factors listed in Condition 72.d.:

$$E = \sum P_{eu} \cdot EF_{eu} \cdot K$$

Where:

E = pollutant emissions in tons/year;

∑ = symbol representing “summation of”;

P<sub>eu</sub> = process parameter for each emissions unit identified in Condition 72.c.;

EF<sub>eu</sub> = emission factor identified for each emissions unit and pollutant in Condition 72.d.; and

K = conversion constant = 1 ton/2000 lbs for annual emissions calculations.

## EMISSION FEES

74. Emission fees will be based on the Plant Site Emissions Limits, unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. [LRAPA 34-180 and OAR 340-220-0090]

## GENERAL TESTING REQUIREMENTS [OAR 340-218-0050(3)(A)]

75. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the DEQ's *Source Sampling Manual*. [LRAPA 35-0120, 35-0140, 34-180, and OAR 340-218-0050(3)(a)(B)&(C)]
- 75.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the *Source Sampling Manual* and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
- 75.b. 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.
- 75.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
- 75.c.i. At least 90% of the design capacity for new or modified equipment;
- 75.c.ii. At least 90% of the normal maximum operating rate for existing equipment.
- 75.c.iii. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
- 75.d. Each source test must consist of at least three (3) test runs and the emissions results must 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.
- 75.e. Source test reports prepared in accordance with the DEQ's *Source Sampling Manual* must 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.

## Emission Factor Testing

76. Once during the permit term **by no later than December 31, 2023**, the permittee must conduct testing to verify the emission factors used to calculate PM and PM<sub>10</sub> emissions from EU03 charring and drying system. Compliance with the briquet dryer PM and PM<sub>10</sub> emissions limits during the alternative operating scenario will be presumed based on the use of natural gas in the auxiliary burner and based on the use of good operating and maintenance practices for the burner. Visible emissions monitoring using Modified EPA Method 9 must be conducted during the testing. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 33-065(5) and 35-0120(1)(a)]
- 76.a. Particulate matter emissions using EPA Methods 5 and 202; and
- 76.b. PM<sub>10</sub> emissions using EPA Method 201A.
77. Once during the permit term **by no later than December 31, 2023**, the permittee must conduct testing to verify the emission factors used to calculate the VOC, NO<sub>x</sub>, SO<sub>2</sub>, and CO emissions from EU03 charring and drying system. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 35-0120(1)(a)]

- 77.a. Volatile organic compounds by EPA Method 25A,
  - 77.b. Nitrogen oxides by EPA Method 7E,
  - 77.c. Sulfur dioxide by EPA Method 6C, and
  - 77.d. Carbon monoxide by EPA Method 10.
78. Once during the duration of the permit term *by no later than December 31, 2023*, the permittee must conduct testing to verify the emission factors used to calculate the PM and PM<sub>10</sub> emissions from EU04 briquet cooling and EU08 briquet handling systems. The testing must be performed on the briquette cooler exhausts (4 total). During the testing the permittee must measure and record the monitoring parameters required by Condition 41. Visible emissions monitoring using Modified EPA Method 9 must be conducted during the testing. The permittee must use the following test methods or alternative test methods approved in writing by LRAPA: [LRAPA 33-065(5) and 35-0120(1)(a)]
- 78.a. Particulate matter emissions using EPA Methods 5 and 202, and
  - 78.b. PM<sub>10</sub> emissions using EPA Method 201A.

#### GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

##### **General Monitoring Requirements:**

79. The permittee must not knowingly render inaccurate any required monitoring device or method. [LRAPA 34-180 and OAR 340-218-0050(3)(a)(E)]
80. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [LRAPA 34-180 and OAR 340-218-0050(3)(a)(F)]
81. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [LRAPA 34-180 and OAR 340-218-0050(3)(a)(G)]

##### **General Recordkeeping Requirements**

82. The permittee must maintain the following general records of testing and monitoring required by this permit: [LRAPA 34-180 and OAR 340-218-0050(3)(b)(A)]
- 82.a. The date, place as defined in the permit, and time of sampling or measurements;
  - 82.b. The date(s) analyses were performed;
  - 82.c. The company or entity that performed the analyses;
  - 82.d. The analytical techniques or methods used;
  - 82.e. The results of such analyses;
  - 82.f. The operating conditions as existing at the time of sampling or measurement; and
  - 82.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
83. Unless otherwise specified by permit condition, the permittee must 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) will 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 must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [LRAPA 34-015, 34-180, 35-0160, and OAR 340-218-0050(3)(b)]

84. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [LRAPA 34-180 and OAR 340-218-0050(3)(b)(C)]
85. Unless otherwise specified, the permittee must 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 (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [LRAPA 34-180 and OAR 340-218-0050(b)(B)]

## REPORTING REQUIREMENTS

### General Reporting Requirements

86. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [LRAPA 36-025(1), 34-180, and 340-218-0050(3)(c)]
  - 86.a. Immediately (within one (1) hour of the event) notify LRAPA of an excess emission event by phone, e-mail, or facsimile; and
  - 86.b. Within 15 days of the excess emissions event, submit a written report that contains the following information:
    - 86.b.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 operation;
    - 86.b.ii. The date and time the owner or operator notified LRAPA of the event;
    - 86.b.iii. The equipment involved;
    - 86.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
    - 86.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
    - 86.b.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 best estimate (supported by operating data and calculations);
    - 86.b.vii. The final resolution of the cause of the excess emissions; and
    - 86.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to LRAPA 36-040.
  - 86.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 must immediately notify LRAPA by calling the Oregon Emergency Response System (OERs). The current number is 1-800-452-0311.
  - 86.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.
  - 86.e. The permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events.
  - 86.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period.

87. Permit Deviations Reporting: The permittee must 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 Title 36 must be reported in accordance with Condition 86. [LRAPA 34-180 and OAR 340-218-0050(3)(c)(B)]
88. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [LRAPA 34-180 and OAR 340-218-0050(3)(c)(D)]
89. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [LRAPA 34-180 and OAR 340-218-0050(3)(c)(E)]

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

LRAPA  
1010 Main Street  
Springfield, OR 97477

Part 70 Operating Permit Program  
U.S. EPA Region 10  
Mail Stop: OAW-150  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

### **Semi-annual and Annual Reports**

90. The permittee must 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. One copy of the report must be submitted to the EPA and two copies to the LRAPA office. All instances of deviations from permit requirements must be clearly identified in such reports: [LRAPA 34-180, OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
- 90.a. The first semi-annual report is due on August 15<sup>th</sup> and must include the semi-annual compliance certification; [LRAPA 34-180 and OAR 340-218-0080]
- 90.b. The annual report is due on March 1<sup>st</sup> and must consist of the following:
- 90.b.i. The emission fee report; [LRAPA 34-180 and OAR 340-220-0100]
  - 90.b.ii. A summary of the excess emissions upset log; [LRAPA 36-025]
  - 90.b.iii. The second semi-annual compliance certification; and [LRAPA 34-180 and OAR 340-218-0080]
  - 90.b.iv. The annual report must also include annual greenhouse gas (GHG) emissions in accordance with OAR 340 Division 215. [LRAPA 34-180, OAR 340-215-0010(2) and 340-215-0040]
91. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [LRAPA 34-180 and OAR 340-218-0080(6)(c)]
- 91.a. The identification of each term or condition of the permit that is the basis of the certification;
- 91.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 must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must 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;

- 91.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in condition 91.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12, occurred;
- 91.d. Such other facts as LRAPA may require to determine the compliance status of the source;
- 91.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications; and [LRAPA 34-180 and OAR 340-218-0080(6)(e)]
- 91.f. Number of CAM excursions and corrective action.

**NON-APPLICABLE REQUIREMENTS**

- 92. The following State and Federal air quality requirements are not applicable to this facility for the reasons stated. [LRAPA 34-180 and OAR 340-218-0110(1)(b)]

| Rule Citation  | Summary   | Reason for Not Being Applicable  |
|--|---|--|
| 40 CFR Part 60, Subpart Dc   | Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units   | The EU10 boiler is rated at less than 10 MMBtu/hr heat input.  |
| 40 CFR Part 63, Subpart DDDDD ('5D')   | National Emission Standards for Hazardous Air Pollutants for Major Sources: Industrial, Commercial, and Institutional Boilers and Process Heaters | These standards do not apply because Kingsford is not, and does not have the potential to be a major source of HAP emissions.  |
| 63.11196(a)(1), (b), (c), (d); 63.11201(a), (b), (d); 63.11205(b) and (c); 63.11210 (a), (b), (d), (e); 63.11211, 63.11212, 63.11213, 63.11214(a), (d); 63.11220; 63.11221; 63.11222; 63.11223(c); 63.11224, 63.11225(a)(3) and (5), (c)(3), (6), (7), (e); 63.11226 | 40 CFR Part 63, Subpart JJJJJ Area Source Requirements for Boilers that are Subject to Emission Limits and Operating Limits.                      | The boiler at the Kingsford facility is not subject to the area source boiler NESHAP because: the natural gas-fired boiler in EU10 is exempt based upon that fuel, and the EU03 ACC, wood dryer retort furnace and briquet dryers are not classified as boilers or process heaters because they are not indirectly heated and because the combustion gases come into contact with process materials. |
| 40 CFR Part 60, Subpart CCCC and DDDD  | Standards of Performance for Commercial and Industrial Solid Waste Incineration Units   | The standard is not applicable because units burning only wood feedstock for the production of charcoal are defined as a "chemical recovery units" in the rule and not incinerators, waste-burning kilns, ERUs or small remote incinerators under subparts CCCC or DDDD.   |
| 40 CFR Part 63, Subpart VVVVVV ('6V')  | National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Manufacturing   | The standard is not applicable because the lead (Pb) content of raw materials, products and by-products processed at the plant are   |

|  |   |   |
|--|---|---|
|  |   | all well below 0.1 percent, by weight.  |
| 40 CFR Part 51 and OAR 340 division 223 - BART | Best Available Retrofit Technology (BART) requirements under the Regional Haze program do not apply | BART does not apply because visibility impacts associated with "BART-eligible" devices at Kingsford were determined to be below the significance level. |

JJW/CMW  
07/11/2019

**GENERAL CONDITIONS**

G1. General Provision

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

G2. Reference Materials

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

- a. Source Sampling Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A4;
- 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 LRAPA 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 must 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 is supplemental to, and does 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 must 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. [LRAPA 34-017]

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 must contain certification by a responsible official of truth, accuracy and completeness. All certifications must 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 must 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.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0200 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee must 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 must 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 is 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 alters or affects 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 must 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.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must 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 must 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 must be submitted in writing to LRAPA. Payment must be made regardless of the dispute. User-based fees will 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 must 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), must be submitted to LRAPA and the EPA.
- c. The permittee must 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 does not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee must 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 must be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
  - c. The permit shield of Condition G11 must not extend to Section 502(b)(10) changes.

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

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must 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 must 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 must submit an application for a significant permit modification in accordance with OAR 340-218-0180.

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

Notwithstanding Conditions G16 and G17, 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]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an air contaminant discharge permit (ACDP) from LRAPA and having satisfied the requirements of LRAPA Title 38.

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 must 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 must follow the same procedures as apply to initial permit issuance and must 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.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must 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 will 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 [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 must have available at the facility at all times a copy of the LRAPA Title V Operating Permit and must 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:

| Source of Contamination  | Control Actions — <b>Alert Level</b>   |
|--|--|
| A. Coal, oil, or wood-fired facilities.                          | 1) Utilization of electric generating fuels having low ash and sulfur content.<br>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.<br>3) Diverting electric power generation to facilities outside of <b>Alert Area</b> . |
| B. Coal, oil, or wood-fired process steam generating facilities. | 1) Utilization of fuel having low ash and sulfur content.<br>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.   |

| Source of Contamination  | Control Actions — <i>Alert Level</i>   |
|--|--|
|  | 3) Substantial reduction of steam load demands consistent with continuing plant operations.  |
| C. Manufacturing industries of the following classifications: <ul style="list-style-type: none"> <li>- Primary Metals Industries</li> <li>- Petroleum Refining</li> <li>- Chemical Industries</li> <li>- Mineral Processing Indus.</li> <li>- Grain Industries</li> <li>- Paper and Allied Products</li> <li>- Wood Processing Industry</li> </ul> | 1) Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations.<br>2) Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance.<br>3) Reduction of heat load demands for processing.<br>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing. |

**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 of 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:

| Source of Contamination  | Control Actions — <b>Warning Level</b>  |
|--|---|
| <p>A. Coal, oil, or wood-fired electric power generating facilities.</p>   | <ol style="list-style-type: none"> <li>1) Maximum utilization of fuels having lowest ash and sulfur content.</li> <li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li> <li>3) Diverting electric power generation to facilities outside of <b>Warning Area</b>.</li> <li>4) Prepare to use a plan of action if an <b>Emergency Condition</b> develops.</li> <li>5) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</li> </ol> |
| <p>B. Coal, oil, or wood-fired process steam generating facilities.</p>  | <ol style="list-style-type: none"> <li>1) Maximum utilization of fuels having the lowest ash and sulfur content.</li> <li>2) Utilization of mid-day (12: 00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li> <li>3) Prepare to use a plan of action if an <b>Emergency Condition</b> develops.</li> <li>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</li> </ol>  |
| <p>C. Manufacturing industries which require considerable lead time for shut-down including the following classifications:</p> <ul style="list-style-type: none"> <li>- Petroleum Refining</li> <li>- Chemical Industries</li> <li>- Primary Metals Industries</li> <li>- Glass Industries</li> <li>- Paper and Allied Products</li> </ul> | <ol style="list-style-type: none"> <li>1) Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.</li> <li>2) Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.</li> <li>3) Maximum reduction of heat load demands for processing.</li> <li>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence of boiler lancing or soot blowing.</li> </ol>      |



| Source of Contamination  | Control Actions — <i>Warning Level</i>   |
|--|--|
| D. Manufacturing industries which require relatively short time for shut-down. | <ol style="list-style-type: none"><li>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.</li><li>2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.</li><li>3) Reduction of heat load demands for processing.</li><li>4) Utilization of mid-day (12 noon to 4 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</li></ol> |

**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**.

| Source of Contamination   | Control Actions — <b>Emergency Level</b>   |
|---|--|
| 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 or soot blowing. |

| Source of Contamination  | Control Actions — <i>Emergency Level</i>  |
|--|---|
|  | 3) Diverting electric power generation to facilities outside of Emergency area.<br>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.   |
| B. Coal, oil, or wood-fired steam generating facilities.   | 1) Reducing heat and steam process demands to absolute necessities consistent with preventing equipment damage.<br>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.<br>3) Taking the action called for in the emergency plan.<br>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.  |
| C. Manufacturing industries of the following classifications:<br>- Primary Metals Industry<br>- Petroleum Refining Operations<br>- Chemical Industries<br>- Mineral Processing Industries<br>- Paper and Allied Products<br>- Grain Industry<br>- Wood Processing Industry | 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.<br>2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.<br>3) Maximum reduction of heat load demands for processing.<br>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing. |