

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

1010 Main Street
Springfield, Oregon 97447

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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:

Rosboro Lumber Company, L.L.C.
P.O. Box 20
Springfield, Oregon 97477

INFORMATION RELIED UPON:

Applications/Permit Number: 207050
Received: 3/21/08-Subpart DDDD request
1/18/08- kiln project application
9/27/07-extension request
9/02/05- application for renewal

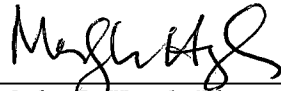
PLANT SITE LOCATION:

2509 Main Street
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:

From: City of Springfield
Dated: 9/06/95

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

December 10, 2008

Effective Date

Nature of Business: Sawmill, Planing Mill, Glulam Beam Plant, Veneer Mill and Plywood Plant
Primary SIC: 2421 Sawmill/Planing Mill
Other SIC: 4961 Fuel-burning equipment, wood-fired, 10 million or more Btu/hr heat input

RESPONSIBLE OFFICIAL:

Title: Operations Manager
Phone: (541) 746-8411

FACILITY CONTACT PERSON:

Name: James Monsen-Daniels
Title: QC/Environmental Supervisor
Phone: (541) 746-8411, ext. 146

Addendum No. 3
Significant Modification Addendum

In accordance with OAR 340-218-0180(1), Title V Operating Permit No. 207050 is hereby amended to incorporate the applicable Plywood MACT requirements as federally enforceable permit limits. This significant modification addendum also amends the number of permitted dry kilns from ten (10) to five (5). The five (5) permitted dry kilns consist of three (3) newly constructed dry kilns and two (2) renovated dry kilns. This significant modification addendum adds the following 13 Title V operating permit conditions.

Proposed Permit Conditions

1. The permittee must comply with the relevant provisions of 40 CFR 63; Subpart DDDD. [40 CFR 63.2231]
2. The reduction in hazardous air pollutants emissions achieved by permit condition number three (3) must be at least 90 percent on a total hydrocarbon basis, as carbon. [40 CFR 63.2240(b)]
3. The emissions from the softwood veneer dryers must be exhausted into the flame zone of the boilers at all times the dryers are in operation. At such times, at least two boilers of the three boilers must be in operation producing 18,000 pounds per hour or more of steam. [40 CFR 63.2240(b)]
4. The permittee must minimize the fugitive emissions from the softwood dryer doors through proper maintenance procedures and through proper balancing of the heated zone exhausts. [40 CFR 63.2241(a)]
5. The miscellaneous coatings in use shall have HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent by mass for other HAP compounds. A material safety data sheet (MSDS) or material content certification document must be maintained onsite for each miscellaneous coating used at the facility. [40 CFR 63.2241(a)]
6. The facility must be in compliance with the compliance options, operating requirements, and the work practice requirements as listed in this Title V permit and in the applicable sections of the 40 CFR 63 Subpart DDDD at all times, except during periods of process unit or control device startup, shutdown, malfunction; and prior to process unit initial startup. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during scheduled startup and shutdown periods, and during malfunctions. These startup and shutdown periods must not exceed the minimum amount of time necessary for these events. [40 CFR 63.2250(a)]
7. The facility must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). [40 CFR 63.2250(b)]
8. The facility must implement a written startup, shutdown, and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e) (3). [40 CFR 63.2250(c)]
9. To the extent practical, startup and shutdown of emission control systems must be scheduled during times when process equipment is also shut down. [40 CFR 63.2251(e)]
10. During periods of startup, shutdown and malfunction (SSM), the permittee must operate in accordance with the SSM Plan. [40 CFR 63.2271]
 - a. Deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the requirements of 40 CFR 63.6(e)(1). LRAPA will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 CFR 63.6(e). [40 CFR 63.2271(b)(2)]

11. The permittee shall certify compliance with the requirements of 40 CFR Subpart DDDD as part of each semi-annual compliance certification. [40 CFR 63.2271 and 40 CFR 63.2281]
 - a. This report must include identification of each instance in which the permittee did not meet each compliance option and operating requirement in Table 7 of Subpart DDDD that applies to the facility. This includes periods of startup, shutdown and malfunctions and periods of control device maintenance. [40 CFR 63.2271(b)]
 - b. The permittee shall report to LRAPA by fax or by telephone within two (2) working days after starting actions inconsistent with the SSM Plan. [40 CFR 63.10(d)(5)(ii)]
 - c. The permittee shall file a written follow-up report with LRAPA within seven (7) days after the end of any SSM event where actions were taken inconsistent with the SSM Plan unless LRAPA has authorized alternative arrangements. [40 CFR 63.10(d)(5)(ii)]
 - d. The permittee must notify LRAPA and the EPA Administrator within 30 days before taking any of the actions specified below:
 - (1) The permittee modifies or replaces the control system for any process unit subject to the compliance options and operating requirements in 40 CFR Part 63, Subpart DDDD. [40 CFR 63.2280(g)(1)]
 - (2) The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter (or operating parameter) for any process unit or control device. [40 CFR 63.2280(g) (3)]
12. The dry kiln drying temperatures shall not exceed 210 degree Fahrenheit when the equipment is in operation, with the exception of:
 - a. the startup and preliminary operation of a new kiln (not to exceed 3 months),
 - b. during an emission related performance test, or
 - c. tests or studies to verify the emission factor/operating parameter (temperature).
13. The permittee shall track and record the board foot volume of the lumber dried in the kilns as a twelve month rolling total, on a wood species-specific basis.