

**LANE REGIONAL AIR PROTECTION AGENCY  
TITLE V OPERATING PERMIT**

1010 Main Street, Springfield, Oregon 97477

Telephone: (541) 736-1056

Toll Free: (877) 285-7272

Fax: (541) 726-1205

Web Page: [www.lrapa.org](http://www.lrapa.org)

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:

**Flakeboard America Limited -- Eugene MDF**  
50 North Danebo Avenue  
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application/Permit Number: 200529  
Received: Significant Modification 3/11/08  
Revision 3/26/08

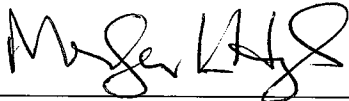
PLANT SITE LOCATION:

50 North Danebo Avenue  
Eugene, Oregon 97402

LAND USE COMPATIBILITY STATEMENT:

From: City of Eugene  
Dated: 4/14/95

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY



Merlyn L. Hough, Director

May 31, 2011

Effective Date

Nature of Business: Medium Density Fiberboard Manufacturing

Primary SIC: 2493 Hardboard Manufacturing, 10,000 or more sqft/hr, 1/8" Basis Finished Product

RESPONSIBLE OFFICIAL:

Title: Plant Manager

FACILITY CONTACT PERSON:

Name: Dave Lyon  
Title: EHS Manager  
Phone: (541) 744-4639

**Addendum No. 1  
Administrative Amendment**

In accordance with OAR 340-218-0150(1)(f) where changes in the date for source testing requirements are allowed under extenuating circumstances, Title V Operating Permit No. 200529 is hereby amended to change the testing deadline for the press-1 biofilter. The deadline is being extended to increase the likelihood for higher ambient temperatures to aid in the establishment of a new high temperature limit for the 24 hour biofilter bed temperature. To implement the testing deadline change, Condition 31.c.iii.is amended as follows:

- 31.a.i. The permittee shall conduct a repeat performance test using the applicable methods specified in Conditions 31.a.i and 31.a.ii ~~within 2 years following the previous performance test~~ by July 31, 2011 and within 180 days after each replacement of any portion of the biofilter media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media. Compliance shall be determined by calculating percent reduction using the formula in Condition 31.a.iii. [Table 7, Row 3 of 40 CFR 63 Subpart DDDD]

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50 North Danebo Avenue  
Eugene, Oregon 97402

LAND USE COMPATIBILITY STATEMENT:

From: City of Eugene  
Dated: 4/14/95

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

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Merlyn L. Hough, Director

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September 30, 2008  
Effective Date

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Nature of Business: Medium Density Fiberboard Manufacturing

Primary SIC: 2493 Hardboard Manufacturing, 10,000 or more sqft/hr, 1/8" Basis Finished Product

RESPONSIBLE OFFICIAL:

Title: Plant Manager

FACILITY CONTACT PERSON:

Name: Dave Lyon  
Title: EHS Manager  
Phone: (541) 744-4639

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## LIST OF ABBREVIATIONS USED IN THIS PERMIT

AQMA	Air Quality Management Area
ASTM	American Society of Testing and Materials
BDT	Bone dry ton
CFR	Code of Federal Regulations
CO	Carbon monoxide
dscf	Dry standard cubic foot of gas volume at 29.92" Hg and 68°F
EF	Emission factor
EPA	US Environmental Protection Agency
ESP	Electrostatic precipitator
EU	Emissions unit
FCAA	Federal Clean Air Act
gr/dscf	Grain per dry standard cubic foot
HAP	Hazardous Air Pollutant as defined by LRAPA Title 37 Table 1
ID	Identification number
I&M	Inspection and Maintenance
LRAPA	Lane Regional Air Protection Agency
M	1000
MB	Material balance
MBF	1000 board feet
Mlb	1000 pounds
MM	Million
MMcf	Million cubic feet
MSDS	Material safety data sheet
MSF	1000 square feet
NA	Not applicable
NO <sub>x</sub>	Oxides of nitrogen
O <sub>2</sub>	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	Operation and Maintenance
Pb	Lead
PCD	Pollution control device
PCWP	Plywood and Composite Wood Products
PM	Particulate matter
PM <sub>10</sub>	Particulate matter less than 10 microns in size
PSEL	Plant Site Emission Limit
RCDME	Routine Control Device Maintenance Exemption
RMP	Risk management plans
scf	Standard cubic foot
SERP	Source Emission Reduction Plan
SIP	State Implementation Plan
SO <sub>2</sub>	Sulfur dioxide
ST	Source test
VE	Visible emissions
VHAP	Volatile Hazardous Air Pollutant
VMT	Vehicle mile traveled
VOC	Volatile Organic Compound

## DEFINITIONS

- d1. **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. 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 OAR 340-208-0010]
- d2. At this facility, production (gross) is defined in units of MSF (3/4” basis) as product of finished (sold) dimension. This definition also applies for emissions calculation.’

**PERMITTED ACTIVITIES**

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120 and LRAPA 34-180]
2. All conditions in this permit are federally enforceable and LRAPA enforceable except as noted below:
  - 2.a. Conditions 4, 5, 6, 7, 8 and G7 are enforceable by LRAPA only.

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

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

**Table 1. Emission Unit and Pollution Control Device Identification**

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Natural Gas- and Sanderdust-fueled Boiler 2	Boiler-2	Baghouse (when boiler fired on sanderdust/fines)	BH-5
Natural Gas-fueled Boiler 3	Boiler-3	None	NA
Pressurized Refiner/Westec Dryer Stage 1	Dryer-1	Wet ESP #1 and #2, and Biofilter	ESP #1 and #2, and Biofilter
Blender-1	BL-1	Baghouse System	BH BL-1 & BH-11
Press-1 (loader, press, and unloader)	Press-1	Baghouse System and Biofilter	P-1/Baghouse System and P-1 Biofilter
<u>Materials Handling Group 1</u> : Baghouses and Cyclone installed after 1970 (BH 1, 6, 7, 8, 9, 11-15, and Cyclone 1)	Mat-1	Baghouses and Cyclone	BH-1, BH-6, BH-7, BH-8, BH-9, BH-11-15, and C1
<u>Materials Handling Group 2</u> : Baghouses installed before 1970 (BH-4)	Mat-2	Baghouse	BH-4
Materials Handling Group 3: Fugitives	Mat-3	None	NA
Materials Handling Group 4: Truck Dump	Mat-4	Enclosure	
Materials Storage Piles	Piles-1	None	NA

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
<u>Aggregate Insignificant Activities:</u> Misc. Chemical Usage           VOC Resin Tanks                        VOC Diesel Tank                         VOC WESP Sediment Tanks           VOC Chip Washer Settling Tank     VOC Steam from Refiner and High-Pressure Cyclone through Pre-Steamer Bin               VOC Unpaved Roads                   PM/PM <sub>10</sub>	AI	None	NA

**EMISSION LIMITS AND STANDARDS**

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

**Table 2. Facility-Wide Emission Limits and Standards**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015(2)	4	Fugitive Emissions	Minimize	I&M Recordkeeping	4.a
49-010	5	Nuisance	Prohibited	Recordkeeping	5.a
32-055	6	PM Fallout	No Deposition of PM >250 µm on Others' Property	I&M Recordkeeping	6.a
33-030	7	Concealment & Masking	Prohibited	I&M Recordkeeping	7.a
51-015	8	SERP	Reduce Emissions	Recordkeeping	8.a
34-060(5)	14	All Criteria Pollutants	Must Meet Criteria for PSELs	Recordkeeping	14.a, 14.b, & 14.c
32-007	11	All Criteria Pollutants	Highest and Best	I&M and Recordkeeping	11.a

4. **Applicable Requirement:** The permittee shall not allow 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. [LRAPA 48-015(2)] This condition is only enforceable by LRAPA.
  - 4.a. **Monitoring, Testing:** [LRAPA 34-070] The permittee shall inspect the facility at least once each day to identify and correct any spillage or leakage from materials handling systems including cyclones, baghouses and conveyors and conveyor transfer points. Spillage or leakage from materials handling systems must be cleaned up immediately during daylight hours. If the spillage is identified during darkness, in hazardous conditions, or in a poorly lit area, the permittee shall remove the materials as soon as reasonably possible but no later than 24 hours following identification.
  - 4.b. **Recordkeeping:** The permittee shall maintain a record of the facility inspections including date, time, and determinations made. The record shall be maintained onsite for a period of at least five (5) years, and shall be provided to LRAPA personnel on request.
5. **Applicable Requirement:** The permittee shall not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010] This condition is only enforceable by LRAPA.
  - 5.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 34-070] The permittee shall maintain a record (a log) of all complaints received by the responsible official or designated employees (written, received via telephone or facsimile, or verbally communicated). Said log shall also record permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the problem within two (2) working days of receiving the complaint or within such longer time (not to exceed five (5) working days) as is reasonably necessary. If more than five (5) days are needed to resolve the problem, the permittee shall notify LRAPA immediately upon making that determination.
6. **Applicable Requirement:** The permittee shall not emit particulate matter which is greater than 250 microns in size if such particulate matter does or will deposit upon the real property of another person. [LRAPA 32-055] This condition is only enforceable by LRAPA.
  - 6.a. **Monitoring, Testing:** [LRAPA 34-070] The permittee shall monitor compliance with this applicable requirement using the facility inspections required in Condition 4.a.
7. **Applicable Requirement:** The permittee shall not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emission of air contaminant which would otherwise violate these rules. [LRAPA 33-030] This condition is only enforceable by LRAPA.
  - 7.a. **Monitoring, Testing:** [LRAPA 34-070] Monitoring of compliance with this applicable requirement shall be performed using the compliance certifications required in Conditions 56 and 58.d.
8. **Applicable Requirement:** In the event that an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee shall take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee shall take action when the permittee first becomes aware of such declaration whether through news media or direct contact with LRAPA.
  - 8.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 34-070] The permittee shall maintain a record (log) of air pollution episodes and emission reduction actions taken, and shall provide the log to LRAPA on request.

9. **Applicable Requirement:** Boiler-2 is limited to exclusive use of fines/sanderdust and natural gas. Boiler-3 is limited to exclusive use of natural gas fuel.
- 9.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 34-070] The records required in Conditions 17 and 20.b shall be used to monitor compliance with this applicable requirement.
10. **Applicable Requirement:** Should this facility become subject to the accidental release prevention regulations in 40 CFR Part 68, the permittee shall submit a risk management plan (RMP) by the date specified in 40 CFR 68.10, and comply with the plan and all other applicable Part 68 requirements. [40 CFR Part 68]
11. **Applicable Requirement:** The permittee shall maintain and operate all air contaminant emitting equipment and air pollution control equipment in a condition that minimizes degradation of air quality. [LRAPA 32-007]
- 11.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 34-070] The permittee shall perform inspections and maintain records of maintenance activities as described in the most recent Air Pollution Control Equipment Inspection and Maintenance (I&M) Plan submitted to LRAPA for approval. The inspection and maintenance plan shall be reviewed and updated as necessary once every 12 months.

**PLANT SITE EMISSION LIMITS**

12. **Applicable Requirement:** The monthly short-term plant site emissions shall not exceed the following: [LRAPA 34-060 (4) and 34-060 (5)]

**Table 3. Short-Term (Monthly) Plant Site Emission Limits**

Emissions Unit ID Number	Pollutant	Short-Term PSEL	Units	Monitoring Requirements	
				Method	Permit Condition
<u>Emissions Units:</u> Boiler 2, Boiler-3, Dryer-1, Blender-1, Press-1, Mat-1, Mat-2, Mat-3, Mat-4 and Piles-1	PM	17,202	lb/month	EF Recordkeeping	14
	PM <sub>10</sub>	16,792	lb/month	EF Recordkeeping	14
	CO	52,511	lb/month	EF Recordkeeping	14
	NO <sub>x</sub>	60,982	lb/month	EF Recordkeeping	14
	SO <sub>2</sub>	441	lb/month	EF Recordkeeping	14
	VOC	64,942	lb/month	EF Recordkeeping	14
	Pb	1.0	lb/month	EF Recordkeeping	14

13. **Applicable Requirement:** The annual plant site emissions (tons per year) for the entire facility shall not

exceed the following on a rolling twelve-month basis: [LRAPA 34-060(4) and 34-060(5)]

**Table 4. Long-Term (Annual) Plant Site Emission Limits**

Emissions Unit ID Number	Pollutant	Long-Term PSEL (Assigned)	Unassigned Emissions	Units	Monitoring Requirements	
					Method	Permit Condition
Plant-1: Includes Emissions Units Boiler-2, Boiler-3, Dryer-1, Blender-1, Press-1, Mat-1, Mat-2, Mat-3, Mat-4, Piles-1 and AI	PM	71	141	tons/year	EF Recordkeeping	14
	PM <sub>10</sub>	70	95	tons/year	EF Recordkeeping	14
	CO	205	354	tons/year	EF Recordkeeping	14
	NO <sub>x</sub>	208	0	tons/year	EF Recordkeeping	14
	SO <sub>2</sub>	1.6	1.1	tons/year	EF Recordkeeping	14
	VOC	252	35.3	tons/year	EF Recordkeeping	14
	Pb	0.0018	0.006	tons/year	EF Recordkeeping	14

- 13.a. The permittee may only use the unassigned emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through OAR 340-218-0180) have been approved by LRAPA. The permittee is not required to pay emission fees for the unassigned emissions.

**Plant Site Emission Limits Monitoring**

14. The permittee shall determine compliance with the plant site emissions limits using the following monitoring and calculation procedures:
- 14.a. The permittee shall monitor and maintain records of the following process parameters:

**Table 5. Process Parameter Monitoring**

Process Parameter	Emissions Unit(s)	Pollutant(s)	Measurement Technique	Measurement Frequency
Amount of Natural Gas Fuel Burned (MMcf/day)	Boiler-2	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly

Process Parameter	Emissions Unit(s)	Pollutant(s)	Measurement Technique	Measurement Frequency
Amount of Fines/Sanderdust Fuel Burned (tons)	Boiler-2	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
Amount of Natural Gas Fuel Burned (MMcf/day)	Boiler-3	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
Sanderdust Fuel Used	Dryer-1	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
Natural Gas Used (MMcf/day)	Dryer-1, Blender-1	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
Furnish Dried (BDT)	Dryer-1, Blender-1	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
Resin Used (lbs) – Informational only, no corresponding emission factor. Report upon LRAPA request.	Blender-1	NA	Recordkeeping	Monthly
MDF Produced (MSF/day - 3/4" basis, gross)	Facility-wide	PM, PM <sub>10</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Production Records	Monthly
Wood Residual Through Truck Dump	Mat-4	PM, PM <sub>10</sub>	Recordkeeping	Monthly

14.b. The permittee shall determine compliance with the PSELs by calculating emissions for each emissions unit using the following formula, process parameters measured in Condition 14.a, and the emission factors listed in Condition 14.c (short-term values shall be prepared within 30 days of the end of the short-term period):

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

where; E = pollutant emissions -- lbs/month or tons/year  
 P<sub>eu</sub> = process parameter identified in Condition 14.a.  
 EF<sub>eu</sub> = emission factor identified for each emissions unit and pollutant in Condition 14.c.  
 K = conversion constant = 1 for monthly emissions calculation and  
 1 ton/2000 lbs for annual emissions calculations.

14.c. The following emission factors shall be used to for calculating short- and long-term emissions when operating in Scenarios I or II:

**Table 6. Emission Factors To Be Used For Calculating Short- And Long-Term Emissions**

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	
<b>Boilers-2,3</b>	PM	Natural gas	7.6	lbs/MMCF	No	NA	NA
	PM <sub>10</sub>	Natural gas	7.6	lbs/MMCF	No	NA	NA
	CO	Natural gas	84.0	lbs/MMCF	No	NA	NA
	NO <sub>x</sub>	Natural gas	100	lbs/MMCF	No	NA	NA
	SO <sub>2</sub>	Natural gas	2.6	lbs/MMCF	No	NA	NA
	VOC (as propane)	Natural gas	6.7	lbs/MMCF	No	NA	NA
	Pb	Natural gas	0.0003	lbs/MMCF	No	NA	NA
<b>Boilers-2</b>	PM	Fines/Sanderdust	7.05	Lb/BDT	Yes	ODEQ Method 7	Once per term, within 180 days of initial combustion of sanderdust/fin es fuel firing during current permit term
	PM <sub>10</sub>	Fines/Sanderdust	6.38	Lb/BDT	No	NA	NA
	CO	Fines/Sanderdust	22.67	Lb/BDT	Yes	EPA Method 10	Once per term, within 180 days of initial combustion of sanderdust/fin es fuel firing during current permit

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	
	NO <sub>x</sub>	Fines/Sanderdust	69.34	Lb/BDT	Yes	EPA Method 7	Once per term, within 180 days of initial combustion of sanderdust/fines fuel firing during current permit
	SO <sub>2</sub>	Fines/Sanderdust	0.42	Lb/BDT	No	NA	NA
	VOC (as propane)	Fines/Sanderdust	0.35	Lb/BDT	No	NA	NA
	Pb	Fines/Sanderdust	0.0008	Lb/BDT	No	NA	NA
<b>Dryer-1</b>	PM	Natural gas Sanderdust Furnish	7.6 3.12 0.35	lbs/MMCF lbs/tonSD lb/BDT furnish	Yes	ODEQ M7	Once per term
	PM <sub>10</sub>	Natural gas Sanderdust Furnish	7.6 3.12 0.35	lbs/MMCF lbs/tonSD lb/BDT furnish	Yes	ODEQ M7	Once per term
	CO	Natural gas Sanderdust Furnish	370 22.5 neg.	lbs/MMCF lbs/tonSD lb/BDT furnish	Yes	EPA RM 10	Once per term
	NO <sub>x</sub>	Natural gas Sanderdust Furnish	115 11.47 neg.	lbs/MMCF lbs/tonSD lb/BDT furnish	Yes	EPA RM7, 7A-E	Once per term
	SO <sub>2</sub>	Natural gas Sanderdust Furnish	2.6 neg. neg.	lbs/MMCF lb/tonSD lb/BDT furnish	No	NA	NA
	VOC (as propane)	Natural gas Sanderdust Furnish	6.7 8.55 1.65	lbs/MMCF lbs/tonSD lbs/BDT furnish	Yes	EPA RM 25A, CP/WP 98.1	Once per term within 180 days of startup of post dryer-resination system
	Pb	Natural gas Sanderdust	5E-4 6E-5	lbs/ton SD	No	NA	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	
<b>Blender-1</b>	PM/PM <sub>10</sub>	Natural Gas Furnish	7.6 0.0186	lb/MMCF lb/ton furnish	No	NA	NA
	CO	Natural Gas	84	lb/MMCF	No	NA	NA
	NO <sub>x</sub>	Natural Gas	100	lb/MMCF	No	NA	NA
	SO <sub>2</sub>	Natural Gas	2.6	lb/MMCF	No	NA	NA
	VOC (as propane)	Natural Gas Furnish	6.7 0.096	lb/MMCF lb/ton furnish	No Yes	EPA RM 25A, CP/WP 98.1	Once per term within 180 days of startup of Blender-1
	Pb	Natural Gas	0.0003	lb/MMCF	No	NA	NA
	VOC	Furnish	0.061	lb/ton furnish	No	NA	NA
<b>Mat-1</b> Baghouse Nos. 1, 7, 8, 9, 11, 12, 13, 14, 15 & Cyclone 1  Baghouse #6	PM/PM <sub>10</sub>	BDT Furnish	0.001	lb/BDT	No	NA	NA
	PM/PM <sub>10</sub>	BDT Sanderdust	0.04	lb/BDT			
<b>Mat-2</b> Baghouse #4	PM/PM <sub>10</sub>	BDT Sanderdust	0.2	lb/BDT	No	NA	NA
<b>Mat-3</b> Fugitives from Material Storage, Conveying & Transfer	PM	NA	32	lbs/month	No	NA	NA
	PM <sub>10</sub>	NA	12	lbs/month	No	NA	NA
<b>Mat-4</b> Truck Dump Area Fugitives	PM/PM <sub>10</sub>	BDT Throughput	0.1	lb/BDT	No	NA	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	
<b>Piles-1</b> Material Storage Piles	PM	NA	10	lbs/month	No	NA	NA
	PM <sub>10</sub>	NA	5	lbs/month	No	NA	NA
	VOC	NA	254	lbs/month	No	NA	NA
<b>Press-1</b>	VOC (normal operations)	MSF Production (Gross)	0.246	lb/MSF(3/4" basis)	Yes	EPA RM 25A, CP/WP 98.1	Once per term
	VOC (RCDME)	MSF Production (Gross)	2.46	lb/MSF(3/4" basis)	Yes	EPA RM 25A, CP/WP 98.1	Once
	PM/PM <sub>10</sub>	MSF Production (Gross)	0.002	lb/MSF(3/4" basis)	Yes	ODEQ RM7	Once per term
	SO <sub>2</sub>	MSF Production (Gross)	Neg.	lb/MSF(3/4" basis)	No	NA	NA
	CO	MSF Production (Gross)	0.034	lb/MSF(3/4" basis)	Yes	EPA M10	Once per term
	NO <sub>x</sub> (normal operations)	MSF Production (Gross)	0.027	lb/MSF(3/4" basis)	Yes	EPA M7, 7A-E	Once per term
	NO <sub>x</sub> (RCDME)	MSF Production (Gross)	0.03	lb/MSF(3/4" basis)	No	NA	NA

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

**Table 7. Emissions Unit Boiler-2 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Boiler-2	32-010(1)(B) 32-010(3)	15	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	15.a
	32-030	16	PM	0.1 gr/dscf @ 12% CO <sub>2</sub>	VE Periodic Monitoring	16.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	17	PM	Emission Action Level – Highest and Best	O&M, Recordkeeping	17

15. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Boiler-2 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]
- 15.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Boiler-2 in accordance with Condition 45. [LRAPA 34-070]
16. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, from emissions unit Boiler-2. [LRAPA 32-030]
- 16.a. **Monitoring, Testing:** Monitoring of compliance with Condition 16 pertaining to emissions unit Boiler-2 shall be conducted using the visible emission monitoring requirements in Condition 15, and by conducting at least one (1) source test on Boiler-2 within 180 days of initial combustion of sanderdust/fines fuel during the current permit term. [LRAPA 34-070]
- 16.a.i. Within 180 days of initial combustion of sanderdust/fines during the current permit term, the permittee shall conduct the source test required by Condition 16.a to verify that the Boiler-2 PM emissions are below the emission limits while burning fines/sanderdust.
- 16.a.ii. The source test shall be conducted in accordance with Condition 16.a.iii, 14.c, and Condition 46.
- 16.a.iii. During each test run, the permittee shall record the following information:
- 16.a.iii.1. Type and quantity of fuel fired in Boiler-2;
- 16.a.iii.2. Amount of steam generated during each test run (lbs); and
- 16.a.iii.3. Visible emissions as measured in accordance with modified EPA Method 9 within 30 minutes before, during or within 30 minutes after each ODEQ Method 7 test run, unless weather conditions are such that it is not possible to read opacity.

17. **Compliance Assurance Monitoring:** *At least daily*, when operating the boiler on fines/sanderdust fuel, the permittee shall monitor the baghouse (BH-5) pressure drop, and initiate corrective action if the pressure drop exceeds the following range in inches of water: 0.5 to 5.0. [CAM – 40 CFR Part 64] [LRAPA 34-070]
- 17.a. A deviation from the approved baghouse pressure drop ranges shall not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
18. **Boiler-2 Recordkeeping:**
- 18.a. A monthly record shall be maintained of the quantity of fuel fired in Boiler-2.
- 18.b. The permittee shall record in a log the results of inspections and any repair activities performed and maintain records of the number and duration of excursions identified in Condition 17, and corrective actions taken.

**Table 8. Emissions Unit Boiler-3 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Boiler-3	32-010(1)(B) 32-010(3)	19	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	19.a
	32-030	20	PM	0.1 gr/dscf @ 12% CO <sub>2</sub>	VE Periodic Monitoring	20.a
	46-554, 40CFR60 Subpart Dc	20.a	PM, NO <sub>x</sub> , SO <sub>2</sub>	Exclusively Fired on Natural Gas	Fuel Use Record	20.b

19. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Boiler-3 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]
- 19.a. **Monitoring, Testing:** The permittee shall monitor visible emissions for emission unit Boiler-3 in accordance with Condition 45. [LRAPA 34-070]
20. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, from Boiler-3. [LRAPA 32-030]
- 20.a. **Monitoring, Testing:** Monitoring of compliance with Condition 20 pertaining to emissions unit Boiler-3 shall be conducted using the visible emission monitoring requirements in Condition 19, and by limiting fuels fired by the boilers to natural gas exclusively. [LRAPA 34-070]
- 20.b. **Recordkeeping:** A monthly record shall be maintained of the quantity of fuel fired in Boiler-3.

**Table 9. Emissions Unit Dryer-1 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dryer-1	32-005	22	PM	Highest and Best	O&M, Recordkeeping	22.a
	32-015(2)	23	PM	0.1 gr/dscf	Parameter Monitoring	23.a
	32-010(2)	21	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	21.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	22.a	PM	Emission Action Level – Highest and Best	O&M, Recordkeeping	22.a
	40 CFR Part 63; Subpart DDDD National Emissions Standards for Hazardous Air Pollutants (NESHAP): Plywood & Composite Wood Products (PCWP)	24	HAP	PCWP MACT	Recordkeeping	24

21. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Dryer-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B).]

21.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emission unit Dryer-1 in accordance with Condition 45. [LRAPA 34-070]

22. **Applicable Requirement:** The permittee shall not operate Dryer-1 unless it is exhausted through wet ESPs #1 and #2. Dryer-1 shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment are maintained at full efficiency and effectiveness to keep the emission of air contaminants at the lowest practicable levels. [LRAPA 32-005]

22.a. **Monitoring, Testing:** [LRAPA 34-070(5)]

22.a.i. At least quarterly, in accordance with the inspection and maintenance plan in Condition 11.a, the permittee shall inspect wet ESPs #1 and #2 on the Dryer-1 for physical degradation, including but not limited to missing spray nozzles that could affect the performance of the control device. The permittee shall make all necessary repairs to Wet

ESPs #1 and #2 to ensure efficient operation. The results of the inspection and any repair activities shall be recorded in a log.

- 22.a.ii. For wet ESPs #1 and #2 controlling emissions units Dryer-1, the permittee shall monitor and record the Wet ESP exhaust temperature and the secondary voltage. The Wet ESP exhaust temperature monitoring devices and voltage indicating devices shall be installed, operated, maintained, and calibrated in accordance with the manufacturer's written instructions.
  - 22.a.ii.1. *At least daily*, the permittee shall monitor the temperature and voltage trends, and initiate corrective action if the outlet temperature exceeds 180 degrees F, or secondary voltage consistently stays below 37 kV for more than two (2) hours during Dryer 1 operation. [LRAPA 32-007 and 40 CFR Part 64 CAM]
  - 22.a.ii.2. The permittee must maintain records of the number and duration of excursions identified in this condition, and corrective actions taken.
- 22.a.iii. A deviation from the approved wet ESP exhaust temperature and secondary voltage ranges shall not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.

23. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot from emissions unit Dryer-1. [LRAPA 32-015 (2)]

23.a. **Monitoring, Testing:** ODEQ Method 7 shall be used for measuring particulate matter emissions from wet ESPs #1 and #2 controlling emissions from emissions unit Dryer-1. Each test run shall be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 dscf. Test results shall be reported as grains per dry standard cubic feet (gr/dscf), pounds per hour, and pounds per 1000 ft<sup>2</sup> on a 1/8" basis of hardboard product (finished product equivalent) produced. [LRAPA 34-070]

- 23.a.i. At least one (1) source test shall be performed on Dryer-1 Wet ESPs during the permit term.
- 23.a.ii. The permittee shall conduct the source test required by Condition 23.a to verify that the dryer particulate emissions are below the emissions limits while operating within the exhaust temperature and secondary voltage range established in accordance with Condition 22.a.ii.
- 23.a.iii. During each test run, the permittee shall record the following information:
  - 23.a.iii.1. Type and quantity of fuel fired in Dryer-1;
  - 23.a.iii.2. Amount of hardboard, finished product equivalent (1000 ft<sup>2</sup>/hr on a 1/8" basis);
  - 23.a.iii.3. Visible emissions as measured in accordance with modified EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 7 test run, unless weather conditions are such that it is not possible to read opacity; and
  - 23.a.iii.4. Wet ESP #1 and #2 exhaust temperatures and secondary voltages.
- 23.a.iv. The source test shall be conducted in accordance with Condition 46.

24. **Applicable Requirement:** No later than October 1, 2008, the permittee shall use an emissions control system and demonstrate that the resulting emissions from Dryer-1 meet the compliance options and operating requirements in Table 1B, Row 5 (reduce overall formaldehyde by 90%) and Table 2 Row 4 (use of control device other than thermal oxidizer, catalytic oxidizer, or biofilter) to 40 CFR 63, subpart DDDD. [40 CFR 63.2240(b)]
- 24.a. **Initial Compliance Demonstration:** The permittee must conduct performance tests and demonstrate compliance by using the procedure described in Condition 31.a no later than 180 days after October 1, 2008. [40 CFR 62.2260(a)]
- 24.a.i. The permittee shall meet the requirements in Table 4 of 40 CFR 63, Subpart DDDD in performing any performance test unless an alternative testing procedure is approved in advance. [40 CFR 63.2260(a) and 40 CFR 63.7(f)]
- 24.a.ii. The permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1). In the event the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond the permittee's control, the permittee must notify LRAPA as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test does not relieve the permittee of legal responsibility for compliance with any other applicable provisions of 40 CFR Part 63 or with any other applicable Federal, State, or local requirement, nor will it prevent LRAPA from implementing or enforcing 40 CFR Part 63 or taking any other action under the Act. [40 CFR 63.7(b)(2)]
- 24.a.iii. The permittee shall include, as part of the written notification of intent to conduct the performance test in Condition 31.a.ii, a petition identifying the site-specific operating parameters to be established during the initial performance test for WESP #1 and WESP#2. [40 CFR Subpart DDDD, Table 2, Row 4]
- 24.a.iv. The permittee shall demonstrate compliance with site-specific operating requirements established for WESP #1 and WESP#2 under Condition 24.a.iii no later than 180 days after October 1, 2008. [40 CFR 63.2261]
- 24.b. **Initial Compliance Demonstration Reporting:** The permittee must submit the Notification of Initial Compliance Status containing the results of the initial compliance demonstration before the close of business on the 60<sup>th</sup> calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2). [40 CFR 60.10(d)(2)]
- 24.b.i. This permittee shall develop and implement a plan for review and approval to address how organic HAP captured in WESP#1 and WESP#1 wastewater is contained or destroyed to minimize release to the atmosphere such that the desired emissions reductions are obtained. The permittee shall submit the plan with the Notification of Compliance Status. [40 CFR 63.2268]
- 24.c. **Continuous Compliance Demonstration:** The permittee shall demonstrate continuous compliance with the compliance options, operating requirements and work practice requirements by and conducting a repeat performance test using the applicable methods specified in Condition 24.a.i within 2 years following the previous performance test and implementing the source specific plan to address how organic HAP captured in the ESP wastewater is contained or destroyed to minimize release to the atmosphere. [LRAPA 34-070 and 40 CFR 63.2268]
- 24.c.i. The permittee must report each instance in which the permittee did not meet each compliance option, operating requirement, and work practice requirement in Table 7 that applies. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in Conditions 24.c.i.1 through 24.c.i.3. These instances are deviations from the compliance options, operating requirements, and work

practice requirements in the NESHAP. These deviations must be reported according to the requirements in Conditions 50 through 55. [40 CFR 63.2271(b)]

- 24.c.i.1. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the SSM Plan. [40 CFR 63.2271(b)(1)]
- 24.c.i.2. 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)]
- 24.c.i.3. Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the approved routine control device maintenance exemption. The routine control device maintenance exemption must not exceed 3 percent of annual operating uptime for each process unit controlled. [40 CFR 63.2271(b)(3)]
- 24.d. **Continuous Compliance Demonstration Reporting:** The permittee shall certify compliance with the requirements of Condition 31.a.iii as part of each semi-annual compliance certification. [40 CFR 63.2271 and 63.2281]
  - 24.d.i. 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 40 CFR Part 63 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)]
  - 24.d.ii. The permittee shall report to LRAPA by fax or by telephone within two working days after starting actions inconsistent with the SSM Plan. [40 CFR 63.10(d)(5)(ii)]
  - 24.d.iii. The permittee shall follow a written follow-up report with LRAPA within 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)]
- 24.e. **Notice:** The permittee must notify LRAPA and the EPA within 30 days before taking any of the actions specified below: [40 CFR 63.2280(g)]
  - 24.e.i. 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)]
  - 24.e.ii. The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device. [40 CFR 63.2280(g)(3)]

**Table 10. Emissions Unit Blender-1 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Blender-1	32-005	27	PM	Highest and Best	O&M, Recordkeeping	27.a
	32-015(2)	26	PM	0.1 gr/dscf	Parameter Monitoring	26.a
	32-010(2)	25	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	25.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	27.a	PM	Emission Action Level/ Indicator Range	O&M, Recordkeeping	27.a

25. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Blender-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]

25.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from the baghouse controlling emissions from emission unit Blender-1 in accordance with Condition 45. [LRAPA 34-070]

26. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot from emissions unit Blender-1. [LRAPA 32-015 (2)]

26.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from the baghouse controlling emissions from emission unit Blender-1 in accordance with Condition 45. [LRAPA 34-070]

27. **Compliance Assurance Monitoring:**

27.a. **At least daily** when operating, the permittee shall monitor the baghouse (BH BL-L) pressure drop, and initiate corrective action if the pressure drop exceeds the following range in inches of water: 0.0 to 6.0. [CAM – 40 CFR Part 64]

27.b. **At least daily** when operating, the permittee shall monitor the baghouse (BH-11) pressure drop, and initiate corrective action if the pressure drop exceeds the following range in inches of water: 0.0 to 3.0. [CAM – 40 CFR Part 64]

27.c. A deviation from the approved baghouse pressure drop ranges shall not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.

27.d. **Recordkeeping:** The permittee shall record in a log the results of inspections and any repair activities performed and maintain records of the number and duration of excursions identified in Conditions 27.a and 27.b, and corrective actions taken.

**Table 11. Emissions Unit Press-1 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Press-1	32-010	28	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	28.a
	32-015	29	PM	0.1 gr/dscf	Stack test and VE Periodic Monitoring	29.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	30	PM	Emission Action Level/Indicator Range	O&M, Recordkeeping	30
	40 CFR Part 63; Subpart DDDD NESHAP: PCWP	31	HAP	PCWP MACT	Recordkeeping	31

28. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Press-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010 (1)(B)]
- 28.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Press-1 in accordance with Condition 45. [LRAPA 34-070]
29. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grain per standard cubic foot from emissions unit Press-1. [LRAPA 32-015(2)]
- 29.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from Press-1 in accordance with Condition 45. [LRAPA 34-070]
30. **Compliance Assurance Monitoring:**
- 30.a. *At least daily* when operating, the permittee shall monitor each baghouse (P-1N and P-1S) pressure drop, and initiate corrective action if the pressure drop exceeds the following range in inches of water: [CAM – 40 CFR Part 64]
- 30.a.i. P-1N: 0.0 to 4.0.
- 30.a.ii. P-1S: 0.0 to 4.0.
- 30.b. A deviation from the approved baghouse pressure drop ranges shall not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
- 30.c. **Recordkeeping:** The permittee shall record in a log the results of inspections and any repair activities performed and maintain records of the number and duration of excursions identified in

Condition 30, and corrective actions taken.

### PCWP MACT Emission Limits, Standards, and Requirements

31. **Applicable Requirement:** No later than October 1, 2008, the permittee shall use an emissions control system (P-1 Biofilter herein referred to as “biofilter”) and demonstrate that the resulting emissions from Press-1 meet the compliance options and operating requirements in Table 1B Row 5 (reduce overall formaldehyde by 90%) and Table 2 to 40 CFR 63, subpart DDDD. [40 CFR 63.2240(b)]
- 31.a. **Initial Compliance Demonstration:** To demonstrate initial compliance the permittee must conduct performance tests and establish compliance with site-specific operating requirements established under Table 2, Row 3 (biofilter) no later than 180 days after October 1, 2008. [40 CFR 62.2260(a)]
- 31.a.i. The permittee shall meet the requirements in Table 4 of 40 CFR 63, subpart DDDD in performing any performance test unless an alternative testing procedure is approved in advance. [40 CFR 62.2260(a) and 40 CFR 63.7(f)]
- 31.a.ii. The permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1). In the event the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond the permittee’s control, the permittee must notify LRAPA as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test does not relieve the permittee of legal responsibility for compliance with any other applicable provisions of 40 CFR Part 63 or with any other applicable Federal, State, or local requirement, nor will it prevent LRAPA from implementing or enforcing 40 CFR Part 63 or taking any other action under the Act. [40 CFR 63.7(b)(2)]
- 31.a.iii. Except as required in Condition 31.a.iv, the permittee shall determine compliance with Table 1B compliance option 5 (90% reduction in formaldehyde emissions) through the use of the following equation: [40 CFR 63.2262(h)]
- $$PR = CE \times ((ER_{in} - ER_{out}) / ER_{in}) \times 100$$
- Where:
- PR = percent reduction (%)
- CE = capture efficiency (%) (assumed to be 100% for Dryer-1 and determined for Press-1 according to 40 CFR 63, subpart DDDD Table 4)
- ER<sub>in</sub> = emission rate of formaldehyde in the inlet vent stream of the control device as specified in Condition 31.a.iv (lb/hr) (calculated by adding the performance test results from testing the inlet of WESP #1, WESP #2 and P-1 Biofilter).
- ER<sub>out</sub> = emission rate of formaldehyde in the outlet vent stream of the control device (lb/hr) (calculated by adding the performance test results from testing the outlet of WESP #1, WESP #2 and P-1 Biofilter).
- 31.a.iv. **ER<sub>in</sub> Testing:** Prior to completion of the post-dryer resin blending project as described in the permittee’s Significant Permit Modification application number 52794 on March 11, 2008, the permittee shall determine the average formaldehyde emission rate (lb/hr) ER<sub>in</sub> in Condition 31.a.iii by way of testing over a representative range of primary MDF product in accordance with a test plan submitted for LRAPA approval.

- 31.a.iv.A. Testing shall be performed according to Condition 46, 40 CFR 63.2262 and 40 CFR Part 63 Subpart DDDD Table 4 as applicable. The average value obtained from the testing required by Condition 31.a.iv will be used as the value for ERin. [40 CFR 63.2262(h) and 340-218-0040(4)]
- 31.b. **Initial Compliance Demonstration Reporting:** The permittee must submit the Notification of Initial Compliance Status containing the results of the initial compliance demonstration before the close of business on the 60<sup>th</sup> calendar day following the completion of the performance test according to 40 CFR 63.10(d)(2). [40 CFR 63.10(d)(2)]
- 31.c. **Continuous Compliance Demonstration:** The permittee shall demonstrate continuous compliance with the compliance options and operating requirements by maintaining the 24-hour block biofilter bed temperature within the range established according to 63.2262(m). [40 CFR 63.2271]
- 31.c.i. The permittee shall determine the 24-hour block biofilter bed temperature after every 24 hours of operation by taking the average of all recorded readings in the previous 24 hours. [40 CFR 63.2270(e)]
- 31.c.ii. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, startups, shutdowns, malfunction and during times covered by the routine control device maintenance exemption are not to be included in the averaging calculations. [40 CFR 63.2270(b and c)]
- 31.c.iii. The permittee shall conduct a repeat performance test using the applicable methods specified in Conditions 31.a.i and 31.a.ii within 2 years following the previous performance test and within 180 days after each replacement of any portion of the biofilter media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media. Compliance shall be determined by calculating percent reduction using the formula in Condition 31.a.iii. [Table 7, Row 3 of 40 CFR 63 Subpart DDDD]
- 31.c.iv. The permittee shall develop a Startup, Shutdown and Malfunction Plan (SSM Plan) compliant with the requirements of 40 CFR 63 Subpart A. [40 CFR 63.6(e)(3)]
- 31.c.v. The permittee shall report each instance in which the permittee did not meet each compliance option and operating requirement in Table 7 that applies. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in Conditions 31.c.v.A through 31.c.v.C. These instances are deviations from the compliance options, operating requirements, and work practice requirements in the NESHAP. These deviations must be reported according to the requirements in Conditions 50 through 55. [40 CFR 63.2271(b)]
- 31.c.v.A. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the SSM Plan. [40 CFR 63.2271(b)(1)]
- 31.c.v.B. 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)]
- 31.c.v.C. Deviations that occur during periods of control device maintenance

covered by any approved routine control device maintenance exemption are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the approved routine control device maintenance exemption. The routine control device maintenance exemption must not exceed 3 percent of annual operating uptime for each process unit controlled. [40 CFR 63.2271(b)(3) and 40 CFR 63.2251(b)(3)]

- 31.d. **Continuous Compliance Demonstration Reporting:** The permittee shall certify compliance with the requirements of Condition 31 as part of each semi-annual compliance certification.
- 31.d.i. 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 40 CFR 63 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)]
- 31.d.ii. The permittee shall report to LRAPA by fax or by telephone within two working days after starting actions inconsistent with the SSM Plan. [40 CFR 63.10(d)(5)(ii)]
- 31.d.iii. The permittee shall follow a written follow-up report with LRAPA within 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)]
- 31.e. **Temperature Monitoring:** For each temperature monitoring device, the permittee must meet the requirements in Conditions 31.e.i through 31.e.vi. [40 CFR 63.2269(b)]
- 31.e.i. Locate the temperature sensor in a position that provides a representative temperature. [40 CFR 63.2269(b)(1)]
- 31.e.ii. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger. [40 CFR 63.2269(b)(2)]
- 31.e.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F. [40 CFR 63.2269(b)(3)]
- 31.e.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor's reading. [40 CFR 63.2269(b)(4)]
- 31.e.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor. [40 CFR 63.2269(b)(5)]
- 31.e.vi. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. [40 CFR 63.2269(b)(5)]
- 31.f. **Notice:** The permittee must notify LRAPA and the EPA within 30 days before taking any of the actions specified below: [40 CFR 63.2280(g)]
- 31.f.i. 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)]
- 31.f.ii. The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device. [40 CFR

63.2280(g)(3)]

**Table 12. Emissions Unit Mat-1 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-1	32-010(1)(B)	32	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	32.a
	32-015(2)	33	PM	0.1 gr/dscf	I&M Monitoring	33.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	34	PM	Emission Action Level/Indicator Range	O&M, Recordkeeping	34

32. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]
- 32.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions units Mat-1 in accordance with Condition 45. [LRAPA 34-070]
33. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot from air contaminant sources in emission unit Mat-1. [LRAPA 32-015 (2)]
- 33.a. **Monitoring, Testing:** Equipment maintenance and periodic inspection as well as the visible emission surveys required in Condition 32.a shall be used to monitor compliance with this applicable requirement. [LRAPA 34-070]
34. **Compliance Assurance Monitoring:**
- 34.a. *At least daily* when operating, the permittee shall monitor each baghouse pressure drop in Mat-1, and initiate corrective action if the pressure drop exceeds the following range in inches of water: [CAM – 40 CFR Part 64]
- 34.a.i. BH-1: 0.1 to 3.0
  - 34.a.ii. BH-6: 0.1 to 4.0
  - 34.a.iii. BH-7: 0.1 to 3.0
  - 34.a.iv. BH-8: 0.0 to 2.5
  - 34.a.v. BH-9: 0.0 to 2.5
  - 34.a.vi. BH-12: 0.1 to 5.0
  - 34.a.vii. BH-13: 0.0 to 3.0
  - 34.a.viii. BH-14: 0.0 to 4.0

- 34.a.ix. BH-15: 0.0 to 6.0
- 34.b. A deviation from the approved baghouse pressure drop ranges shall not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
- 34.c. **Recordkeeping:** The permittee shall maintain records of the maintenance inspections, determinations made, and corrective actions (if required).

**Table 13. Emissions Unit Mat-2 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-2	32-010(1)(B)	35	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	35.a
	32-015(1)	36	PM	0.2 gr/dscf	I&M Monitoring	36.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	37	PM	Emission Action Level	O&M, Recordkeeping	37

- 35. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-2 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]
  - 35.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions units Mat-2 in accordance with Condition 45. [LRAPA 34-070]
- 36. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter, in excess of 0.2 grain per standard cubic foot from air contaminant sources in emissions unit Mat-2. [LRAPA 32-015 (1)]
  - 36.a. **Monitoring, Testing:** Equipment maintenance and periodic inspection as well as the visible emission surveys required in Condition 35.a shall be used to monitor compliance with this applicable requirement. [LRAPA 34-070]
- 37. **Compliance Assurance Monitoring:**
  - 37.a. *At least daily* when operating, the permittee shall monitor each baghouse pressure drop in Mat-2 (BH-4), and initiate corrective action if the pressure drop exceeds the following range in inches of water: [CAM – 40 CFR Part 64]
    - 37.a.i. BH-4: 0.5 to 6.0
  - 37.b. A deviation from the approved baghouse pressure drop ranges shall not by itself be considered a

violation of the particulate matter concentration limit or opacity standard in this permit.

- 37.c. **Recordkeeping:** The permittee shall maintain records of the maintenance inspections, determinations made, and corrective actions (if required).

**Table 14. Emissions Unit Mat-3 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-3	32-010(1)(B)	38	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	38.a

38. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-3 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]

- 38.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Mat-3 in accordance with Condition 45. [LRAPA 34-070]

**Table 15. Emissions Unit Mat-4 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-4	32-010(1)(B)	40	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	40.a
	33-060(5)(A)	39	PM	Enclosed Truck Dump And Storage Areas.	NA	NA

39. Emissions of particulate matter from the medium density fiberboard (MDF) operation are subject to the requirements of LRAPA 33-060(5). The permittee shall comply with the following:
- 39.a. All truck dumping and storage areas holding or intending to hold raw materials shall be enclosed to prevent windblown particulate emissions from these areas to be deposited upon property not under the ownership of the permittee. [LRAPA 33-060(5)(A)]
- 39.b. If the permittee proposes to control windblown particulate emissions from truck dumping and storage areas other than by enclosure, the permittee shall apply to LRAPA for authorization to utilize alternative controls. The application shall be submitted pursuant to LRAPA 34-035 and shall describe in detail the plan proposed to control windblown particulate emissions and indicate on a plot plan the nearest location of property not under ownership of the permittee. [LRAPA 33-060(5)(C)]

40. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant

into the atmosphere from emissions unit Mat-4 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]

40.a. **Monitoring, Testing:** The control plan required in Condition 39.b and the visible emissions surveys required in Condition 4.a shall be used to determine compliance with this applicable requirement. [LRAPA 34-070]

**Table 16. Emissions Unit Plant-4 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dryer-1, Blender-1, Press-1, Mat-1, Mat-2, Mat-3, and Piles-1	33-060(5)(D)	41	PM	1.0 pound PM/1000 ft <sup>2</sup> (1/8) production	Recordkeeping	41.a

41. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter from facility activities/processes other than Boiler-2, Boiler-3, Mat-4, and AI in excess of 1.0 pounds per 1000 square feet of finished product (1/8 basis). [LRAPA 33-060(5)(D)]

41.a. **Monitoring, Testing:** The permittee shall monitor compliance with this requirement by performing inspections and maintaining records of maintenance activities as described in the most recent Air Pollution Control Equipment Inspection and Maintenance (I&M) Plan required by Condition 11.a. [LRAPA 34-070]

41.b. **Recordkeeping:** The permittee shall maintain records in accordance with Conditions 11.a. and 14.a.

**Table 17. Emission Limits and Standards That Apply To Insignificant Activities**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
32-010(1)(B)	42	Opacity	20%
32-030	42	PM/PM <sub>10</sub>	0.1 gr/dscf
32-015(2)	42	PM/PM <sub>10</sub>	0.1 gr/dscf

42. **Applicable Requirement:** LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions [OAR 340-200-0020] exist at facilities required to obtain a 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:

42.a. OAR 340-208-0110 [LRAPA 32-010(1)(B) and 32-010(3)] (20% opacity);

42.b. OAR 340-228-0210. [LRAPA 32-015(2)] (0.1 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel-burning equipment);

42.c. OAR 340-226-0210 [LRAPA 32-015(2)] (0.1 gr/dscf for non-fugitive, non-fuel burning equipment).

43. 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 OAR 340-208-0010 and perform the testing in accordance with ODEQ’s *Source Sampling Manual*.

**PCWP MACT Miscellaneous Coating Operation Requirements**

44. Applicable Requirement: The permittee shall use only “non-HAP coatings” as defined in 40 CFR 63.2292 for all group 1 miscellaneous coating operations. [40 CFR 63 Subpart DDDD Table 3, Row 5]

44.a. Continuous Compliance: The permittee shall continue to use non-HAP coatings AND keep records showing that the permittee is using non-HAP coatings. [40 CFR 63 Subpart DDDD Table 8, Row 5]

**GENERAL MONITORING REQUIREMENTS [OAR 340-212-0120 and 340-218-0050(3)(a)]**

45. On the schedule contained in Conditions 45.a, the permittee shall conduct a six (6) minute visible emission survey of each emission unit with devices with the potential to emit visible air contaminants to the atmosphere using EPA Method 22 for monitoring pertaining to Conditions 15, 19, 21, 25, 28, 32, 35, and 38. The visible emission surveys may be conducted simultaneously on multiple emission points when they are in the same field of view for the observer. The person conducting this survey does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. Excessive emissions observed using Method 22 are considered to be any visible emissions that leave the emission unit boundaries for more than 5% of the survey time. The emission unit boundary is defined as the general location on the permittee’s property of the emission unit that includes the emitting device.

45.a. The permittee shall use the following monitoring schedule for conducting the visible emission surveys:

45.a.i. Weekly for the following:

**Table 18. Weekly Visible Emission Monitoring Points**

Emissions Unit	Monitoring Point
Facility-wide survey to include Piles-1	Facility-wide

45.a.ii. Initially, weekly for the following:

**Table 19. Weekly Visible Emission Monitoring Points**

Emissions Unit	Monitoring Point
Press-1	Press Biofilter Outlet

45.a.iii. Initially, monthly for the following emissions units:

**Table 20. Monthly Visible Emission Monitoring Points**

Emissions Unit	Monitoring Point
Boilers 2 and 3	BH-5 vent for Boiler-2 when operating on sanderdust/fines fuel and Boiler Stacks
Dryer-1	ESP #1 and #2 Stacks
Blender-1	Baghouse BL-1 Stack & Baghouse 11 Stack
Mat-1, Mat-2, Mat-3, Mat-4	Baghouse Stacks, Cyclone Stacks, and Materials-Handling Areas

- 45.b. All visible emissions surveys shall be conducted during operating conditions that have the potential to create visible emissions (e.g., process is operating under normal, representative conditions).
- 45.c. If the weekly surveys specifically for Press-1 conducted during four (4) consecutive weeks do not result in the need for corrective action, the surveys need only be done once per month.
- 45.d. If the monthly surveys conducted during four (4) consecutive months do not result in the need for corrective action, the surveys need only be done once per quarter.
- 45.e. If visible emissions (for baghouses visible emissions observations are required for particulate only, not gaseous, emissions) are detected at the emission unit boundary for more than 5% (18 seconds) of the survey time, the permittee shall take corrective action which includes one of the following (45.e.i or 45.e.ii):
- 45.e.i. For fugitive emissions from emission units the permittee shall use water, sweeping, a chemical treatment, or other effective method to minimize the fugitive emissions, unless cold weather would make this activity result in hazardous conditions. Cold weather is defined as weather conditions where ambient temperatures at surface level are expected to be or have been less than 32°F within 12 hours. If water is used to control the fugitive dust emissions, the permittee shall take care not to create a water quality problem from surface water run-off.
- 45.e.ii. Modified EPA Method 9 shall be used to determine opacity in accordance with ODEQ's *Source Sampling Manual* within 24 hours on the affected monitoring point. Each modified Method 9 observation period shall be for a minimum of six (6) minutes unless any one (1) reading is equal to or greater than 20% opacity, in which case the observation period shall be for a minimum of 60 minutes or until a violation of the emissions standards identified in Conditions 15, 19, 21, 25, 28, 32, 35, and 38, or an exceedence of the applicable requirement is documented, whichever is a shorter period. The permittee shall record the results of the Modified EPA Method 9 tests.
- 45.e.iii. For emissions units with a baghouse as a control device, the permittee shall perform

corrective action by checking the condition of the bags and/or perform maintenance on the baghouses.

- 45.f. The permittee shall record the corrective action taken or the results of the modified EPA Method 9 tests.
- 45.g. If an exceedence occurs, the survey and/or observation frequency for the affected monitoring point will start over with the initial frequency specified in Conditions 45.a.ii through 45.a.iii.
- 45.h. If the observer is unable to conduct the survey and/or modified Method 9 tests due to visual interferences caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow which impair visibility, or darkness, the observer shall note such conditions on the data observation sheet and make at least three attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day during daylight hours. If the visible emissions survey and/or test could not be conducted on the regularly scheduled day due to interferences, the observer shall conduct the test on the following day.
- 45.i. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each visible emissions survey or modified Method 9 test.

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

- 46. Unless otherwise specified in this permit, the permittee shall conduct all testing in accordance with ODEQ's *Source Sampling Manual*.
  - 46.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to 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.
  - 46.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.
  - 46.c. Unless otherwise specified by permit condition or LRAPA-approved source test plan, all compliance source tests must be performed as follows
    - 46.c.i. At least 90% of the design capacity for new or modified equipment;
    - 46.c.ii. At least 90% of the maximum operating rate for existing equipment; or
    - 46.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. 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.
  - 46.d. Each source test shall consist of at least three (3) test runs and the emissions results shall be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.

- 46.e. Source test reports prepared in accordance with the ODEQ'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.
47. The permittee shall conduct emission factor verification tests in accordance with ODEQ's *Source Sampling Manual* for the emission units/emission factors identified as requiring testing in Condition 14.c at least once during the permit term. [OAR-340-220-170(1)]
- 47.a. The permittee shall notify LRAPA at least 15 days prior to conducting any emission factor verification tests by submitting a source test plan in accordance with ODEQ's *Source Sampling Manual*.
- 47.b. The permittee shall submit a summary of all emission factor verification tests to LRAPA within 60 days of any test, unless otherwise approved by LRAPA. The summary shall include the following information:
- 47.b.i. Emissions unit and monitoring point identification;
  - 47.b.ii. Emission results in pounds per hour and emission factor units;
  - 47.b.iii. Process parameters during the test (e.g., material throughput, steam production, etc.); and
  - 47.b.iv. Control device operating parameters.
- 47.c. The emissions factors listed in Condition 14.c are not enforceable limits unless otherwise specified in this permit. Any tests conducted solely to confirm the validity of emission factors shall not be used to determine compliance with the PSELs in Conditions 12 through 13 unless otherwise specified in the permit. Compliance with PSELs shall only be determined by the calculations contained in Condition 14.b of this permit, using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 14.c.

#### **GENERAL RECORDKEEPING REQUIREMENTS [OAR 340-218-0050(3)(b)]**

48. The permittee shall maintain the following general records where applicable for monitoring required by this permit:
- 48.a. Date, place as defined in the permit, and time of sampling or measurements;
  - 48.b. Date(s) analyses were performed;
  - 48.c. Company or entity that performed the analyses;
  - 48.d. Analytical techniques or methods used;
  - 48.e. Results of such analyses;
  - 48.f. Operating conditions as existing at the time of sampling or measurement; and
  - 48.g. Records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
49. The permittee shall retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report, or application. Support information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit shall also be retained for five (5) years.

**REPORTING REQUIREMENTS [OAR 340-218-0050(3)(c)]**

50. Excess Emissions Reporting [LRAPA 36-001 through 36-030]
- 50.a. The permittee shall report all excess emissions in accordance with LRAPA 36-001 through 36-030. In summary, the permittee shall immediately (i.e., as soon as possible but in no case more than one hour after the beginning of the excess emission period) notify LRAPA by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance. Notification shall, to the extent reasonably ascertainable at the time of notification, include the source name, nature of the emissions problem, name of the person making the report, name and telephone number of the contact person for further information, date and time of the onset of the upset condition, whether or not the incident was planned, the cause of the excess emission (e.g., startup, shutdown, maintenance, breakdown, or other), equipment involved in the upset, estimated type and quantity of excess emissions, estimated time of return to normal operations, efforts made to minimize emissions, and a description of remedial actions to be taken. Follow-up reporting shall be made in accordance with LRAPA direction and OAR 340-214-0330(2) and LRAPA 36-025.
- 50.b. Notification shall be made to LRAPA. The current LRAPA telephone number is **541-736-1056**.
- 50.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee shall immediately notify LRAPA by calling the Oregon Accident Response System (OARS). The current number is **1-800-452-0311**.
- 50.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee shall submit startup, shutdown, or scheduled maintenance procedures used to minimize excess emissions to LRAPA for prior authorization, as required in OAR 340-214-0310 and LRAPA 36-015. New or modified procedures shall be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee shall abide by the approved procedures and have a copy available at all times.
- 50.e. The permittee shall notify LRAPA of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if the source is located in a nonattainment area for a pollutant which may be emitted in excess of applicable standards.
- 50.f. The permittee shall maintain and submit to LRAPA a log of planned and unplanned excess emissions, on LRAPA-approved forms, in accordance with LRAPA 36-025.
51. Permit Deviation Reporting. The permittee shall promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within fifteen (15) days of the deviation. Deviations that cause excess emissions, as specified in LRAPA 36-001 through 36-030 shall be reported in accordance with LRAPA 36-025. [OAR 340-218-0050(3)(c)(B)]
52. Unless otherwise specified by permit condition, the permittee shall make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions), the missing record(s) shall not be considered a permit deviation provided the data available accounts for 90% of the operating hours in a reporting period. Upon discovering that a required record is missing, the permittee shall document the reason for the missing record.
53. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]

54. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
55. The regulatory agencies' addresses are as follows, (unless otherwise instructed by LRAPA):

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

Air Operating Permits  
US EPA Region 10  
1200 Sixth Avenue, OAQ-107  
Seattle, WA 98101  
(206) 553-4273

### SEMI-ANNUAL AND ANNUAL REPORTS

56. The permittee shall submit three (3) copies of the semi-annual monitoring report, using LRAPA-approved forms, covering the period January 1 to June 30 **by August 30**, and covering the period July 1 to December 31 **by March 15**, unless otherwise approved in writing by LRAPA. Two (2) copies of the report shall be submitted to LRAPA and one (1) copy to EPA Region 10. The semi-annual monitoring report shall include the semi-annual compliance certification.
57. The permittee shall submit three (3) copies of the annual monitoring report, covering the period January 1 to December 31, using LRAPA-approved forms, **by March 15**. Two (2) copies of the report shall be submitted to LRAPA and one (1) copy to EPA Region 10.
58. The annual monitoring report shall consist of:
- 58.a. Annual records of production and process information identified in Table 6;
  - 58.b. Emission Fee Report;
  - 58.c. Excess Emissions Upset Log; [OAR 340-214-0340 (LRAPA 36-025)] and
  - 58.d. Second Semi-Annual Compliance Certification. [OAR 340-218-0080]
59. Other reporting requirements include the following:
- 59.a. Source test plans; and
  - 59.b. Emission factor verification testing summaries.
60. 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): [OAR 340-218-0080(6)(c)]
- 60.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 60.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;

- 60.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition 60.b. 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 OAR 340-200-0020, occurred; and
- 60.d. Such other facts as LRAPA may require to determine the compliance status of the source.
- 60.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. [OAR 340-218-0080(6)(e)]
- 60.f. Number of CAM excursions and corrective action.
- 60.g. A PCWP MACT compliance report addressing the emission units subject to 40 CFR 63, Subpart DDDD (Dryer-1 and Press-1) and meeting the requirements of 40 CFR 63.2281(c). [40 CFR 63.2281(b)(5)]

MAX/CMW  
9/30/08

**GENERAL CONDITIONS**

G1. General Provision

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

G2. Reference Materials

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

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

G3. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee shall comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G4. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

G5. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(d), and 340-218-0080(2)]

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

G6. Open Burning [LRAPA Title 47]

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

- G7. 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 shall comply with OAR 340-248-0200 through 340-248-0280, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

- G8. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

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

- G9. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
  - i. such applicable requirements are included and are specifically identified in the permit, or
  - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit shall alter or affect the following:
  - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
  - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
  - iii. the applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or
  - iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).
- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150 (1)(h), significant permit modification, or reopening for cause by LRAPA.

- G10. Inspection and Entry [OAR 340-218-0080(3)]

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

- a. Enter upon the permittee's premises where a LRAPA Title V Operating Permit Program source is located or emissions-related activity is conducted, or where records must be kept under the conditions of the permit;
- b. Have access to and copy, at reasonable times, any records that must be kept under conditions of the permit;
- c. Inspect, at reasonable times, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under the permit; and
- d. As authorized by the FCAA or LRAPA rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G11. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

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

G12. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee shall monitor for, and record, any off-permit change to the source that:
  - i. Is not addressed or prohibited by the permit;
  - ii. Is not a Title I modification;
  - iii. Is not subject to any requirements under Title IV of the FCAA;
  - iv. Meets all applicable requirements;
  - v. Does not violate any existing permit term or condition; and
  - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), shall be submitted to LRAPA and the EPA.
- c. The permittee shall keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G9 shall not extend to off-permit changes.

G13. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee shall monitor for, and record, any Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
  - i. Violate an applicable requirement;
  - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
  - iii. Be a Title I modification.
- b. A minimum 7-day advance notification shall be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G9 shall not extend to Section 502(b)(10) changes.

G14. Administrative Amendment [OAR 340-218-0150]

Administrative Amendments to this permit shall be requested and granted in accordance with OAR 340-218-0150. The permittee shall promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

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

- G15. Minor Permit Modification [OAR 340-218-0170]  
The permittee shall submit an application for a minor permit modification in accordance with OAR 340-218-0170.
- G16. Significant Permit Modification [OAR 340-218-0180]  
The permittee shall submit an application for a significant permit modification in accordance with OAR 340-218-0180.
- G17. Staying Permit Conditions [OAR 340-218-0050(6)(e)]  
Notwithstanding Conditions G14 and G15, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.
- G18. Construction/Operation Modification [OAR 340-218-0190]  
No permittee shall construct or make modifications required to be reviewed under OAR 340-218-0190), the construction/operation modification rules, without receiving a Notice of Approval in accordance with OAR 340-218-0190. The permittee should allow 60 days for LRAPA review of applications for a construction/operation modification if public notice is not required, or 180 days if public notice is required.
- G19. New Source Review Modification [LRAPA Title 38]  
No permittee shall construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010). The permittee should allow 180 days for LRAPA review of an ACDP application for New Source Review.
- G20. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]  
The need to halt or reduce activity shall not be a defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- G21. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]  
The permittee shall furnish to LRAPA, within a reasonable time, any information that LRAPA may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to LRAPA copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to LRAPA along with a claim of confidentiality.
- G22. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-020]  
a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.  
b. A permit shall be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).  
c. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

G23. 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.

G24. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

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

G25. 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).

G26. Property Rights [OAR 340-200-0020(9)(c) and 340-218-0050(6)(d)]

The permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of federal, state, or local laws or regulations, except as provided in OAR 340-218-0110.

G27. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

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

ALL INQUIRIES SHOULD BE DIRECTED TO:

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