

Lane Regional Air Pollution Authority
Minimal Air Contaminant Discharge Permit

REVIEW REPORT

McDougal Bros., Inc., Portable Horizontal Grinder

Permit No. 205180

1. General Background Information

McDougal Bros., Inc., headquartered in Creswell, Oregon, operates a number of wood-products industry facilities in Lane County. The business uses one (1) portable diesel-fired horizontal grinder to produce hogged fuel from wood waste, operating at any of several locations where wood waste is available. The business is allowed to operate the grinder 3,645 hours per year to remain qualified for its minimal Air Contaminant Discharge Permit (ACDP).

2. Reasons for Permit Action

The facility operates a process listed in Table A, Part II, in Title 34 of Lane Regional Air Pollution Authority's (LRAPA) Rules and Regulations, and is, therefore, required to obtain a permit. The reason for this permit action is to issue a new permit for the facility.

3. Enforcement History

Two (2) Notices of Non-Compliance (NON) were issued to the facility on July 14, 2004; one for operating the grinder without the required ACDP (NON 2711), and the second for failing to take reasonable precautions to minimize fugitive dust (NON 2588). This permit is issued to resolve NON 2711, and it contains conditions that require measures be taken to minimize fugitive dust when necessary.

4. Performance Test Results

There is no record of any performance testing completed at the facility. At this time no testing is required by LRAPA.

5. Plant Site Emission Limits

Baseline Emissions Rate

Because the facility did not exist in the baseline year of 1977/1978, the baseline emissions are set at zero (0) tons per year for the following criteria pollutants: CO, NO_x, SO₂, PM/PM₁₀, and VOC.

Plant Site Emission Limits (PSELs)

In accordance with LRAPA 34-060(5)(A), the PSELs in the permit will be based on projected operating conditions, as reflected in the permit application.

The annual PSELs for the facility have been set equal to the projected annual emissions for each criteria pollutant. The PSELs for the diesel-fired horizontal grinder are based on the maximum hourly design rate for the equipment and 3,645 hours per year of operation.

Emission values less than 0.5 tons/year are not included in the PSELs as per Oregon DEQ *Permitting and Guidance Manual*. The following annual PSELs will be in the permit (all values are in tons per year).

Annual PSEL
(tons/year)

Source	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Diesel-fired Grinder	4.0	4.0	1.0	9.0	2.0	0.8

Hourly
(pounds/hour)

Source	PM	PM ₁₀	SO ₂	NO _x	CO	VOC
Diesel-fired Grinder	2.2	2.2	0.6	5.0	1.1	0.4

The attachment to this review report contains the calculations of the PSELs.

6. Other Emission Limitations

LRAPA's process weight rule specifies limits on the emissions of particulate matter for specific processes as a function of the amount of material processed [LRAPA 32-045(A)]. Because PM emissions are minimal, the facility is expected to be in compliance with the process weight rule.

The permit includes general visible emissions limitations for the facility as well as general grain-loading limitations for the facility.

The facility is required to use the water spray system on the grinder when grinding material that is deemed, by an LRAPA inspector, a fugitive dust problem.

7. Hazardous Air Pollutants

The projected HAP emissions from the facility are expected to be minimal.

8. Typically Achievable Control Technology (TACT)

LRAPA Title 32-008 requires an existing emission unit at a facility to meet TACT if the emissions unit has emissions of criteria pollutants greater than ten (10) tons per year of any gaseous pollutant or five (5) tons per year of particulate, the emissions unit is not subject to the emissions standards under LRAPA Title 32, Title 33, Title 39, or Title 46 for the pollutants emitted, and the facility is required to have a permit. The diesel-fired grinder emits less than ten (10) tons per year of gaseous pollutants and less than five (5) tons per year of particulate and is, therefore, not required to meet TACT.

9. New Source Review and Prevention of Significant Deterioration

Because the proposed PSELs for all regulated pollutants are below the Significant Emission Rates (SERs) in LRAPA Title 38, the facility is not subject to LRAPA's New Source Review (NSR)

requirements for PM₁₀ nor the Prevention of Significant Deterioration (PSD) requirements for SO_x, NO_x, CO, and VOC.

10. New Source Performance Standards

There are no sources at the facility subject to any NSPS.

11. Continuous Compliance

To ensure compliance with the hourly and annual PSEs, the facility is required to keep a record of the following information for a period of two (2) years.

<u>Parameter</u>	<u>Minimum Recording Frequency</u>
a. Hours of operation for the grinder (totaled yearly)	Daily
b. Sulfur content and used oil analyses for each delivery of fuel oil.	Each Delivery

12. Reporting Requirements

The facility is required to report any entries in the upset log as required per Condition G15.

Within two (2) weeks of the issuance of the permit, the facility is also required to provide LRAPA with a list of locations where the grinder will regularly be operated. If the facility moves the grinder to a location not listed, the facility is required to notify LRAPA at least two (2) working days in advance of the equipment relocation.

13. Production Limits

The total operating time for the diesel-fired horizontal grinder is not to exceed 3,645 hours per year.

14. Public Notice

The draft permit was on public notice from October 7, 2004, to November 8 2004. No written comments were received during the 30-day comment period.