

Lane Regional Air Protection Agency
Standard Air Contaminant Discharge Permit

REVIEW REPORT

Natron Wood Products, LLC

Permit No. 207512

1. General Background Information

The facility operates a veneer drying facility in Jasper, Oregon that processes a maximum of 60 million square feet per year. The facility has had a number of owners/operators since the mid 1970's and, most recently, was formerly operated by Timber Products Company which terminated its ACDP on June 23, 2003. The facility is currently owned by Jasper Wood Products and operated as Natron Wood Products, LLC. In 1994 the facility's name changed from The Murphy Company to Springfield Forest Products and LRAPA changed the permit number from 205145 to its current permit number of 207512.

The operation consists of one (1) gas-fired veneer dryer with the emissions being controlled by one (1) gravel bed scrubber. The operating schedule for the source will be 8,760 hours/year (24 hours per day, 7 days per week, and 52 weeks per year).

2. Reasons for Permit Action

The primary reason for the permit issuance is to renew the expired permit and to incorporate the latest emission estimates, limits and establish baseline emission rates.

3. Enforcement History

There have been no enforcement actions against the facility by LRAPA.

4. Performance Test Results

A performance test was conducted for PM/PM₁₀ on the veneer dryer scrubber exhaust on February 15, 2000, when the facility was owned by Timber Products Company. The results showed that PM₁₀ emissions were 0.19 lb/1000 square feet. However, the PSEL for PM₁₀ is based upon the more conservative ODEQ emission factor of 0.29 lb/1000 square feet.

5. Plant Site Emission Limits

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

The annual PSELs for the facility have been revised with the renewal and set in accordance with LRAPA Title 42. Short-term (daily) PSELs were removed from the permit in accordance with LRAPA Title 42. The following annual PSELs will be in the permit (all values are in tons per year).

Source	PM	PM ₁₀	NO _x	VOC
Totals	24	14	39	99

The Attachment to this Review Report contains the estimations of emissions.

Baseline Emissions Rate (BER)

The facility has been in operation since the 1970's but a baseline was not established in any previous permit. A file review indicated the facility was owned and operated in the baseline period by The Murphy Company, Natron Division with a permit number of 205145. LRAPA gave the facility its current permit number (207512) during a name change in the middle 1990's. LRAPA files indicate permitted production in the 1978 calendar year of approximately 90 million square feet of veneer (3/8" basis) from three (3) direct, gas-fired, veneer dryers. No actual production data was discovered in the LRAPA files, so potential throughput was used. There was a fire at the facility on December 15, 1984 and the facility considered shutting down the plant but decided

to maintain the permit by paying fees. Current operations consist of only one (1) of the original three (3) veneer dryers. Actual baseline emissions for VOC were estimated to be 139 tons/year using current emission factors and the VOC netting basis is reduced to 99 tons/year to avoid the 100 ton/year major source threshold.

Baseline Emission Rate and Netting Basis

Source	PM	PM ₁₀	NO _x	VOC
Totals	13	13	5.4	99

6. Other Emission Limitations

LRAPA 33-060(3)(B) limits particulate matter emissions from veneer and plywood production to one (1) pound per 1000 square feet of veneer or plywood (excluding veneer dryers, fuel-burning equipment, and refuse-burning equipment). The PM emissions from the facility are far below this limit.

The permit includes general visible emissions limitations for the facility in addition to specific visible emission limitations for veneer dryers. The permit includes general grain loading limitations for the facility.

7. Hazardous Air Pollutants

The maximum projected HAP emissions from the facility are listed in the table below (based upon a maximum potential production throughput of 85 million square feet per year of veneer produced (3/8" basis). Because the facility's production is limited by the permit to 60 million square feet per year, HAP emissions will be less than the amounts listed in the table below. The potential emissions for HAPs are below the major source thresholds and therefore the facility is an area source of HAP emissions. There are no National Emission Standards for HAPs for which the facility is subject.

Pollutant	Tons/year
Acetaldehyde	2.8
Formaldehyde	2.9
Methanol	1.6
Phenol	0.7
Propionaldehyde	0.2
Total HAPs	8.7

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 veneer-drying operation is subject to Title 33 for veneer dryer emissions and is, therefore, not required to meet TACT.

9. New Source Review (NSR) and Prevention of Significant Deterioration (PSD)

Because the proposed PSEs 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 (NESHAPs)

There are no sources at the facility that are subject to new source performance standards.

11. Production Limits

In order to ensure that the PSEs are not exceeded, the facility's production will be limited to 60,000,000 square feet per each 12-month rolling period (on 3/8-inch basis) of green veneer through the dryer.

12. Continuous Compliance

To ensure compliance with the daily 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. Veneer production by species (square feet, 3/8-inch basis)	Daily When Operating
b. Inspection of scrubber (including spray nozzles)	Daily When Operating
c. Maintenance of scrubber	As Performed

13. Reporting Requirements

The facility is required to submit an annual report by March 15th each year as required per permit Condition 14.

14. Public Notice

The draft permit was on public notice from February 8, 2010 to March 13, 2010. No written comments were submitted during the 35-day comment period.

MAX/cmw
3/18/10

Natron Wood Products

Allowable Throughput	60,000 (1000 sq ft/yr)
Potential Throughput	85,000 (1000 sq ft/yr)
Baseline Throughput	90,000 (1000 sq ft/yr)

Veneer Drying

Pollutant	Emission Factor (lb/1000 sq ft)	Potential Emissions (ton/yr)	Allowable Emissions (ton/yr)	Baseline Emissions (ton/yr)
PM/PM10	0.29	12.3	8.7	13.1
CO	0.02	0.9	0.6	0.9
NOx	0.12	5.1	3.6	5.4
VOC	3.1	131.8	93.0	139.5
Acetaldehyde	0.062	2.6	1.9	2.8
Acrolein	0.0009	0.0	0.0	0.0
Formaldehyde	0.064	2.7	1.9	2.9
Methanol	0.036	1.5	1.1	1.6
Phenol	0.006	0.3	0.2	0.3
Propionaldehyde	0.0016	0.1	0.0	0.1
Total HAPs		7.2		

Veneer Cooling Section

VOC		0.05	2.1	1.5	2.3
Acetaldehyde		0.003	0.1	0.1	0.1
Acrolein	BDL		--	--	--
Formaldehyde		0.002	0.1	0.1	0.1
Methanol		0.006	0.3	0.2	0.3
Phenol	BDL		--	--	--
Propionaldehyde		0.002	0.1	0.1	0.1
Total HAPs			0.6		

Veneer Fugitives

VOC		0.046	2.0	1.4	2.1
Acetaldehyde		0.003	0.1	0.1	0.1
Formaldehyde		0.002	0.1	0.1	0.1
Methanol		0.006	0.3	0.2	0.3
Phenol		0.01	0.4	0.3	0.5
Total HAPs			0.9		

Plant Site Totals

	Potential	PSEL	Allowable	Baseline	1978
PM/PM10	12.3		14	8.7	13.1
CO	0.9 --			0.6	0.9
NOx	5.1		39	3.6	5.4
VOC	135.8		99	95.9	139.5
Acetaldehyde	2.9		9	3.1	2.8
Acrolein	0.0		9 --		0.0
Formaldehyde	2.9		9	3.2	2.9
Methanol	2.0		9	2.3	1.6
Phenol	0.7		9 --		0.3
Propionaldehyde	0.2		9	0.2	0.1
Total HAPs	8.7		24	8.8	7.7

Baseline emissions are based upon 90,000,000 sq ft/yr in 1978 for natural-gas (direct) fired veneer drying
 Baseline throughput from LRAPA Emission Inventory file for "The Murphy Company, Natron Division" permit no. 205145
 Facility purchased by Springfield Forest Products in 1994 and given new permit no. 207512
 Emission factors are from General Permit for "Veneer Dryer Gas Heat, Doug Fir, 45% burley scrubber control
 VOC Netting Basis reduced to 99 tons/year to comply with federal major source 100 ton/year threshold