

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

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

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

ISSUED TO:
Pacific States Plywood, Inc.
419 South 28th St.
Springfield, OR 97477

INFORMATION RELIED UPON:
Application/Permit Number: 208864
Received: 5/13/05

PLANT SITE LOCATION:
419 South 28th Street
Springfield, Oregon 97477

LAND USE COMPATIBILITY STATEMENT:
From: City of Springfield
Dated: 8/24/95

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough, Director

July 30, 2008
Date

Nature of Business: Plywood Manufacturing
Primary SIC: 2436 Plywood Manufacturing, 25,000 or more sq. ft./hr, 3/8" basis finished product
Other SICs: 4961 Fuel-burning Equipment Inside AQMA, <35 million Btu/hr heat input

RESPONSIBLE OFFICIAL:

FACILITY CONTACT PERSON

Title: General Manager or
Plant Manager

Title: General Manager
Phone: (541) 895-2151

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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 OAR 340-244-0040
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
MeOH	Methanol
MM	million
MMcf	million cubic feet
MSDS	material safety data sheet
MSF	1000 square feet
NA	not applicable
NO _x	oxides of nitrogen
O ₂	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
PM	particulate matter
PM ₁₀	particulate matter less than 10 microns in size
PSEL	Plant Site Emission Limit
RMP	Risk management plans
scf	standard cubic foot
SERP	Source Emission Reduction Plan
SO ₂	sulfur dioxide
ST	source test
VE	visible emissions
VMT	vehicle mile traveled
VOC	volatile organic compound

DEFINITIONS

For the purposes of this permit “Modified EPA Method 9” or “Modified Method 9” is defined as follows: opacity shall be measured in accordance with EPA Method 9. For all standards, the minimum observation period shall be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or exceed the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. [See the definition of “Opacity” in OAR 340-208-0010]

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 6, 8, and G21 are enforceable by LRAPA only.
 - 2.b. Attachment 1 to this permit provides a cross reference for Oregon Air Quality Regulations that have been renumbered in the current Oregon Administrative Rules. [OAR 340-218-0060 and 340-218-0070]

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. Operating Scenario I: Emission Unit and Pollution Control Device Identification

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Natural Gas, Diesel Fuels Boiler 1 Natural Gas Fuel Boiler 2	Boilers-1	None	NA
Fuel Cell Start-ups	Cell-1	None	NA
Dryers 1, 2 Stack Emissions	Dryers-1	Wet ESP and RTO	ESP/RTO
Dryers 1, 2 Fugitives	Dryers-2	None	NA
Press	Press-1	None	NA
Steaming Vats	Vat-1	None	NA
Materials Handling Group 1: Dry Chip Cyclone/Baghouse 1, Baghouse 2 Cyclone/Baghouse 3 Dry Chip Bins	Mat-1	Baghouses	BH-1, BH-2, BH-3
Materials Handling Group 2:	Mat-2	None	NA

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Green End Cyclones, Hog fuel Bin, Green Chip Bins, Hog Fuel Silo			
Materials Handling Group 3: Debarkers, Chopsaw	Mat-3	None	NA
Unpaved Roads	Roads-U	Work Practices	NA
Aggregate Insignificant Activities: Log Marking VOC Resin Storage Tank VOC Moisture Meter VOC Patch Line VOC Grade stamping VOC Stenciling VOC Panel Oiler VOC	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	PM	Minimize Visible PM Emissions	I&M Recordkeeping	4.a
32-065 2. B.	5	Distillate Fuel Oil, ASTM Grade 2	0.5% Sulfur, Each Shipment	Recordkeeping	5.a
49-010	6	Nuisance	No Nuisance	Recordkeeping	6.a
32-055	7	PM Fallout	No Deposition of PM >250 µm on Others Property	I&M Recordkeeping	7.a
32-007	8	All Criteria	Highest and Best	I&M and Recordkeeping	8.a

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
33-030	9	Concealment & Masking	Prohibited	I&M Recordkeeping	9.a
51-015	11	SERP	Reduce Emissions	Recordkeeping	11.a
40 CFR Part 68	10	Risk Management	Risk Management Plan	NA	10

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)].

4.a. **Monitoring, Testing:** *At least monthly*, the permittee shall visually survey the facility (with specific observation of Dryer-2, Vat-1, Mat-3 and Roads-U) for any sources of excess visible emissions. For the purpose of this survey, excess visible emissions are considered to be any visible emissions that leave the general area on the plant site where the emissions originate. 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. If sources of excess visible emissions are identified during the survey, the permittee shall perform one of the following:

- 4.a.i. immediately take corrective action to minimize any fugitive emissions including but not limited to the following:
 - 4.a.i.1. Use, where possible, of water or chemicals for control of dust in demolition or construction activities, the grading of roads or the clearing of land;
 - 4.a.i.2. Application of asphalt, approved road oil, water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
 - 4.a.i.3. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals is not sufficient to prevent particulate matter from becoming airborne;
 - 4.a.i.4. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
 - 4.a.i.5. Adequate containment during sandblasting or other similar operations;
 - 4.a.i.6. Covering of moving, open-bodied trucks transporting materials likely to become airborne;
 - 4.a.i.7. Prompt removal from paved streets of earth or other material which does or may become airborne.

- 4.a.ii. or conduct a modified EPA Method 9 within 24 hours.
- 4.b. **Recordkeeping:** The permittee shall maintain records of the visible emissions surveys, corrective actions (if performed), and/or the results of any modified Method 9 tests performed.
5. **Applicable Requirement:** The permittee shall not use any ASTM Grade 2 distillate fuel oil containing more than 0.5 percent sulfur by weight [LRAPA 32-065(2)(B)]. Note that specifications for motor vehicle fuels are not administered by LRAPA.
- 5.a. **Monitoring, Testing:** The permittee shall monitor the sulfur content of (ASTM Grade 2) oil received by:
- 5.a.i. obtaining certification of compliant sulfur content from each supplier of fuel oil to the facility; or
 - 5.a.ii. analyzing or having analyzed by a contract laboratory a monthly composite of representative samples taken by the permittee from each batch of fuel received. The analysis shall be performed in accordance with ASTM D129-64, D1552-83, or D4057-81.
- 5.b. **Recordkeeping:** The permittee shall maintain a record of all fuel sulfur analyses and/or certifications received.
6. **Applicable Requirement:** The permittee shall not cause or allow air contaminants from any source subject to regulation by LRAPA to create a nuisance. [LRAPA 49-010]. This condition is only enforceable by LRAPA.
- 6.a. **Monitoring, Testing, Recordkeeping:** 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 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 the Authority immediately upon making that determination.
7. **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].
- 7.a. **Monitoring, Testing:** The visible emission surveys required in Condition 4.a will be sufficient monitoring to determine compliance with this applicable requirement.
8. **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].
- 8.a. **Monitoring, Testing, Recordkeeping** [LRAPA 34-070]: The permittee shall maintain an inspection and maintenance (I&M) plan for air pollution control devices not subject to CAM (i.e., the RTO) and sources of fugitive emissions at the facility. The plan shall include the control equipment parameters and control equipment elements that will be inspected, the frequency of inspections, and proposed equipment operating parameter ranges, operation outside of which will initiate corrective action. A log of inspections and corrective actions and routine maintenance shall be maintained by the permittee for a period of at least 5 years. The inspection and maintenance plan shall be reviewed, updated, and resubmitted for LRAPA approval once every 12 months.

9. **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 contaminants which would otherwise violate these rules. [LRAPA 33-030] This condition is only enforceable by LRAPA.

9.a. **Monitoring, Testing:** No monitoring is required for this condition. .

10. **Applicable Requirement:** Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then 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:** In the event that an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by the Authority, 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, direct contact with LRAPA, or from other sources.

11.a. **Monitoring, Testing, Recordkeeping:** The permittee shall maintain a record (log) of air pollution episodes and emission reduction actions taken, and shall provide the log to the Authority on request.

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 Plant Site Emission Limits

Emissions Unit ID Number	Pollutant	Short-Term PSEL	Units	Monitoring Requirements	
				Method	Permit Condition
Plantwide: Includes Emissions Units Boilers-1, Dryers-1, Dryers-2, Cell-1, Press-1, Mat-1, Mat-2, Mat-3 and Roads-U	PM	12,100	lb/month	EF Recordkeeping	14.a
	PM ₁₀	7,600	lb/month	EF Recordkeeping	14.a
	CO	30,500	lb/month	EF Recordkeeping	14.a
	NO _x	10,500	lb/month	EF Recordkeeping	14.a
	SO ₂	1,100	lb/month	EF Recordkeeping	14.a
	VOC	6,800	lb/month	EF Recordkeeping	14.a

13. **Applicable Requirement:** The plant site emissions for any 12 consecutive calendar month period shall not exceed the following [LRAPA 34-060(4) and 34-060(5)]:

Table 5. Long-Term Plant Site Emission Limits

Emissions Unit ID Number	Pollutant	Long-Term PSEL	Units	Monitoring Requirements	
				Method	Permit Condition
Plantwide: Includes Emissions Units Boilers-1, Dryers-1, Dryers-2, Cell-1, Press-1, Vat-1, Mat-1, Mat-2, Mat-3, Roads-U, and AI	PM	55	tons/year	EF Recordkeeping	14.a
	PM ₁₀	34	tons/year	EF Recordkeeping	14.a
	CO	138	tons/year	EF Recordkeeping	14.a
	NO _x	47	tons/year	EF Recordkeeping	14.a
	SO ₂	5	tons/year	EF Record-keeping	14.a
	VOC	31	tons/year	EF Recordkeeping	14.a
	Pb	0.03	tons/year	EF Recordkeeping	14.a
	HAPs*	9 –single HAP 24-total HAPs	tons/year	EF Recordkeeping	14.a

*Methanol is the HAP required to be tracked by 14.a (see HAPs section in review report).

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 6. Process Parameter Monitoring

Process Parameter	Emissions Unit(s)	Pollutant(s)	Measurement Technique	Measurement Frequency
Amount and Type of Fuel Burned (M gallons /day,	Boilers-1	PM, PM ₁₀ , CO, NO _x , SO ₂ , and	Recordkeeping	Monthly

Process Parameter	Emissions Unit(s)	Pollutant(s)	Measurement Technique	Measurement Frequency
MMcf/day)		VOC		
Wood Waste Fuel Used	Cell-1	PM, PM ₁₀ , CO, NO _x , SO ₂ , VOC, and HAPs	Recordkeeping	Each Start-up
Actual Veneer Dried By Type (e.g.; Green or Redry) (MSF/day - 3/8" basis)	Dryers-1, Dryers-2	PM, PM ₁₀ , VOC, CO, NO _x , SO ₂ , and HAPs	Production Records	Daily
Green Veneer Production (MSF/day - 3/8" basis)	Vat-1, Mat-2, Mat-3, and Road-U	PM, PM ₁₀ , VOC, and HAPs	Production Records	Daily
Actual Plywood Pressed (MSF/day - 3/8" basis)	Press-1, Plant-3	VOC and HAPs	Production Records	Daily
Final Plywood Production (MSF/day - 3/8" basis)	Mat-1, Plant-3	PM, PM ₁₀ and HAPs	Production Records	Daily

14.b. The permittee shall determine compliance with the PSELs by calculating emissions for each emissions units using the following formula, process parameters measured in Condition 14.a, and the emission factors listed in Condition 14.c:

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

where; E = pollutant emissions - lbs/month or tons/yr
 P_{eu} = process parameter identified in Condition 14.a.
 EF_{eu} = emission factor identified for each emissions unit and pollutant in Condition 14.c.
 K = conversion constant = 1 ton/2000 lbs for annual emissions calculations.

14.c. The following emission factors shall be used to for calculating emissions:

Table 7. Emission Factors To Be Used For Calculating Emissions

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
					Yes/No	Test Method
Boilers-1	PM	LPG natural gas diesel fuel	0.4 7.6 2.0	lb/Mgal. LPG lb/MMcf lb/M gallons	No	NA
	PM ₁₀	LPG natural gas diesel fuel	0.4 7.6 1.0	lb/Mgal. LPG lb/MMCF lb/M gallons	No	NA
	CO	LPG natural gas diesel fuel	3.6 84 5.0	lb/Mgal. LPG lb/MMCF lb/M gallons	No	NA
	NO _x	LPG natural gas diesel fuel	14.0 100.0 20.0	lb/Mgal. LPG lb/MMCF lb/M gallons	No	NA
	SO ₂	LPG natural gas diesel fuel	0.08 2.6 71.0	lb/Mgal. LPG lb/MMCF lb/M gallons	No	NA
	VOC	LPG natural gas diesel fuel	0.5 5.5 0.2	lb/Mgal. LPG lb/MMCF lb/M gallons	No	NA
	Pb	LPG Natural Gas Diesel Fuel	0.0 0.0003 0.0083	lb/Mgal. LPG lb/MMCF lb/M gallons	No	NA
Cell-1	PM	Wood Fuel	47	lb/ton Hog Fuel	No	NA
	PM ₁₀	Wood Fuel	17	lb/ton Hog Fuel	No	NA
	CO	Wood Fuel	6.6	lb/ton Hog Fuel	No	NA
	NO _x	Wood Fuel	0.38	lb/ton Hog Fuel	No	NA
	SO ₂	Wood Fuel	0.08	lb/ton Hog Fuel	No	NA
	VOC	Wood Fuel	0.18	lb/ton Hog Fuel	No	NA
	Pb	Wood Fuel	0.003	lb/ton Hog Fuel	No	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
					Yes/No	Test Method
Dryers-1	PM/PM ₁₀	Douglas Fir/White Wood	0.04	lb/MSF Dried (3/8" basis)	Yes	ODEQ Method 7
	CO	Douglas Fir/ White Wood	1.32	lb/MSF Dried (3/8" basis)	Yes	EPA Method 10
	NO _x	Douglas Fir/ White Wood	0.44	lb/MSF Dried (3/8" basis)	Yes	EPA Method 7E
	SO ₂	Douglas Fir/ White Wood	0.0097	lb/MSF Dried (3/8" basis)	No	NA
	VOC	Douglas Fir/ White Wood	0.08	lb/MSF Dried (3/8" basis)	Yes	EPA Method 25A
	Pb	Douglas Fir/ White Wood	0.0004	lb/MSF Dried (3/8" basis)	No	NA
	HAPs (MeOH)	Douglas Fir/ White Wood	0.0043	lb/MSF Dried (3/8" basis)	No	NA
Dryers-2	PM/PM ₁₀	Douglas Fir/ White Wood	0.21	lb/MSF Dried (3/8" basis)	No	NA
	CO	Douglas Fir/ White Wood	0.47	lb/MSF Dried (3/8" basis)	No	NA
	NO _x	Douglas Fir/ White Wood	0.02	lb/MSF Dried (3/8" basis)	No	NA
	SO ₂	Douglas Fir/ White Wood	0.001	lb/MSF Dried (3/8" basis)	No	NA
	VOC	Douglas Fir/ White Wood	0.08	lb/MSF Dried (3/8" basis)	No	NA
	Pb	Douglas Fir/ White Wood	0.00004	lb/MSF Dried (3/8" basis)	No	NA
	HAPs (MeOH)	Douglas Fir/ White Wood	0.0047	lb/MSF Dried (3/8" basis)	No	NA
Vat-1	VOC	Douglas Fir/ White Wood	0.087	lb/MSF (3/8" basis)	No	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
					Yes/No	Test Method
	HAPs (MeOH)	Douglas Fir/ White Wood	0.0073	lb/MSF (3/8" basis)	No	NA
Mat-1 Cyclone/ Baghouse 1	PM/PM ₁₀	BDT Plytrim	1E-3/1E-3	lb/BDT	No	NA
Cyclone/ Baghouse 1	PM/PM ₁₀	BDT Sanderdust	4E-2/4E-2	lbs/BDT		
Baghouse 2	PM/PM ₁₀	BDT Sawdust	1E-3/1E-3	lb/BDT		
Cyclone/ Baghouse 3	PM/PM ₁₀	BDT Sanderdust	4E-2/4E-2	lb/BDT		
Dry Chip Bins	PM/PM ₁₀	BDT plytrim and BDT sanderdust	0.1/0.1	lb/BDT		
	VOC	Plywood	0.085	lb/MSF (3/8" basis)		
	HAPs (MeOH)	Plywood	0.0220	lb/MSF (3/8" basis)		
Mat-2 Green End Cyclones Hog Fuel Bin, Green Chip Bins, Hog Fuel Silo	PM/PM ₁₀ PM/PM ₁₀	BDT Chips BDT Hogfuel	0.5/0.25 0.1/0.05	lb/BDT lb/BDT	No	NA
	PM/PM ₁₀ PM/PM ₁₀	BDT Chips BDT Hogfuel	0.1/0.05 0.1/0.05	lb/BDT lb/BDT		
Mat-3 Chopsaw, Debarkers	PM/PM ₁₀ PM/PM ₁₀	cunits logs cunits logs	0.25/0.088 0.07/0.025	lb/cunit lb/cunit	No	NA
Press-1	VOC	Plywood	0.0282	lb/MSF (3/8" basis)	No	NA
	PM/PM ₁₀	Plywood	0.05/0.03	lb/MSF (3/8" basis)		
	HAPs (MeOH)	Plywood	0.056	lb/MSF (3/8" basis)		
Unpaved Roads	PM	All Traffic	0.053	lb/MSF (3/8" basis)	No	NA
	PM ₁₀	All Traffic	0.019	b/MSF (3/8" basis)	No	NA

14.d. 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 PSEs in Conditions 12 and 13 unless otherwise specified in this permit. Compliance with PSEs shall only be determined by the calculations contained in condition of this permit, using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 14.c.

Table 8. Emissions Unit Boilers-1 Specific Emission Limits and Standards

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Boilers-1	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 ₂	ST Periodic Monitoring	16.a

15. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Boilers-1 for a period or periods aggregating more than three minutes in any one 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 Boilers-1 in accordance with Condition 43.

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% CO₂ or 50% excess air, from emissions unit Boilers-1. [LRAPA 32-030]

16.a. **Monitoring, Testing:** Monitoring of Condition 16 pertaining to emissions unit Boilers-1 shall be performed by conducting the visible emission monitoring requirements in Condition 15.a, and by satisfying the emission limitations calculations for Boilers-1 in Condition 14.

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

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Cell-1	32-010 1.B. 32-010 3.	17	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	17.a
	32-030	18	PM	0.1 gr/dscf @ 12% CO ₂	Fuel Periodic Monitoring	18.a

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

17.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from the abort stack for unit Cell-1 in accordance with Condition 43.

18. **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% CO₂ or 50% excess air, from emissions unit Cell-1. [LRAPA 32-030]

18.a. **Monitoring, Testing:** The permittee shall use dry fuels (less than 20% moisture) exclusively for start-up charges to the fuel cell. Dried veneer scrap prior to addition of resin or glue shall be considered less than 20% w/w moisture, if stored in a dry location until used.

18.b. **Recordkeeping:** Documentation of the quantity, type of fuel, and frequency of start-up fuel charges will be maintained in a log and made available to the Authority on request.

19. **Applicable Requirement:** The permittee shall not operate the emissions unit Cell-1 with any fuel other than hogged fuel except that incidental volumes of oily rags, oil booms and absorbents, oily debris and resinous wastes generated at the Springfield facility are permitted to be burned in this unit. [LRAPA 32-007]

19.a. **Recordkeeping:** The permittee shall maintain a log of the type and amounts of non-wood based fuel (oily rags, oil booms and absorbents, oily debris and resinous wastes) burned in emissions unit Cell-1.

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

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dryers-1	32-015 2.	20	PM	0.1 gr/dscf	Parameter Monitoring	24.b
	33-060 3.A.(2)(a) 33-060 3.A.(2)(b)	23	Visible Emissions	10% opacity average (see below); 20% maximum as a 6 min. avg.	VE Periodic Monitoring	23.c
	33-060 3.A.(3)(a) or (b), and (c)	24	PM	0.75 lb PM/M sq. ft. if fuel < 20% H ₂ O 1.5 lb PM/M sq.ft. if fuel >20% H ₂ O	Stack Testing	24.b
	33-060 3.A.(5)	22	Highest And Best	Minimize Emissions	O&M Recordkeeping	22.a

20. **Applicable Requirement:** The permittee shall not cause or allow the operation of the veneer dryers such that particulate matter emissions exceed the Lowest Achievable Emission Rate (LAER) [LRAPA 38-015]. A control

device, no less efficient at removing particulate matter than 90 percent, is required to control the exhaust from the veneer dryers.

20.a. **Monitoring, Testing:** The compliance test required in Condition 24.b.i shall include measurement of particulate concentrations at both inlet and outlet of the control equipment train (wet ESP and RTO) to evaluate the control efficiency of the system.

21. **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 Dryers-1. [LRAPA 32-015-2.]
22. **Applicable Requirement:** Each veneer dryer shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. [LRAPA 33-060-3.A.(5)]

22.a. **Monitoring (Compliance Assurance Monitoring), Testing: [40 CFR 64.3]**

- 22.a.i. During each regularly scheduled maintenance outage of the dryers, in accordance with the I&M plan required in Condition 8.a, the permittee shall inspect the wet ESP on the Dryers-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 the Wet ESP to ensure efficient operation. The results of the inspection and any repair activities shall be recorded in a log.
- 22.a.ii. The Wet ESP secondary voltage and pressure drop monitoring devices shall be installed, operated, maintained, and calibrated in accordance with the manufacturer's written instructions.
- 22.a.iii. The permittee shall record the Wet ESP secondary voltage and pressure drop *once per operating day*. The permittee shall take corrective action anytime the Wet ESP secondary voltage or pressure drop is outside the indicator ranges stated below. Operation of Dryers-1 when the 3-day average pressure drop or 2-hour secondary voltage is outside these indicator ranges is not, by itself, a violation of this permit.
- 22.a.iii.1. The indicator ranges for the Wet ESP are:
- 22.a.iii.1.A. Secondary voltage less than 37kV for more than 2 hours; and
 - 22.a.iii.1.B. Pressure drop greater than 2.5 inches of water over a 3-day period.

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

23. **Applicable Requirement:** The permittee shall not cause or allow the operation of a veneer dryer such that visible air contaminants emitted from the dryer stack or emission point exceed:

23.a. An average operating opacity of 10% [LRAPA 33-060 3.A.(2)(a)]; or

23.b. A maximum opacity of 20% [LRAPA 33-060 3.A.(2)(b)].

"Average operating opacity" means the opacity of emissions determined using modified EPA

Method 9 on any three days within a 12-month period which are separated from each other by at least 30 days; a violation of the average operating opacity limitation is judged to have occurred if the opacity of emissions on each of the three days is greater than the specified average operating opacity limitation. [LRAPA 33-060 1.A.] "Maximum opacity" means the opacity as determined by modified EPA Method 9 (average of 24 consecutive observations). [LRAPA 33-060 1.G.]

23.c. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Dryers-1 in accordance with Condition 43.

24. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter in any one hour from the wet ESP controlling emissions unit Dryer-1 in excess of the following [LRAPA 33-060(3)(A)(3)]:

- 24.a.i. 0.75 pounds per 1000 square feet of veneer dried (3/8 basis) if fuel fired in the fuel cell is 20 percent moisture by weight or less; or
- 24.a.ii. 1.5 pounds per 1000 square feet of veneer dried (3/8 basis) if fuel fired in the fuel cell is greater than 20 % moisture by weight;

24.b. **Monitoring, Testing** Oregon DEQ Method 7 and EPA Methods 1 through 4 shall be used for measuring particulate matter emissions from the pollution control equipment train controlling emissions from emissions unit Dryer-1. Oregon DEQ Method 7 shall be applied simultaneously at both the inlet and outlet of the train to determine its control efficiency. 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 ft² on a 3/8" basis of veneer dried.

- 24.b.i. At least one source test shall be performed on Dryer-1 pollution control equipment train during the permit term. Testing performed during the 15-month period prior to issuance of this permit shall qualify as meeting this requirement.
- 24.b.ii. The permittee shall conduct the source test required by Condition 24.b to verify that the dryer particulate emissions are below the emissions limits while operating within the indicator ranges established in Condition 22.a.
- 24.b.iii. During each test run, the permittee shall record the following information:
 - 24.b.iii.1. Species of veneer dried;
 - 24.b.iii.2. Amount of veneer dried (1000 ft²/hr on a 3/8" basis);
 - 24.b.iii.3. Amount of redry (%);
 - 24.b.iii.4. 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;
 - 24.b.iii.5. Dryer conditions including dryer temperatures by zone and drying time;
 - 24.b.iii.6. Wet ESP secondary voltage; and
 - 24.b.iii.7. Fuel cell firing rate (tons/hour), fuel moisture content, and fuel type.

Lowest Achievable Emission Rate (LAER) and Prevention of Significant Deterioration (PSD)

25. Particulate Matter emissions (PM10) from the veneer dryers are subject to control requirements established under LRAPA 38-015(1)(A). Except as provided in Condition 9, the veneer dryers shall only be operated when connected to control equipment with a demonstrated control efficiency of 90% or better for PM₁₀, as determined during the performance test required in Condition 24.b.
26. As agreed by Consent Decree entered between the Willamette Industries and the Environmental Protection Agency (EPA) signed July 20, 2000, the permittee will capture all VOC emissions from “hot zone” stacks of the veneer dryers and install control technology that achieves a minimum of 90% destruction for the captured VOCs.
27. Each veneer dryer shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. [LRAPA 33-060-3.A(5)]
- 27.a. A temperature measurement device(s) shall be installed in the RTO combustion chamber(s), and located in a position that provides a representative temperature. Each temperature sensor (or sensor arrangement) shall be installed, calibrated, and maintained according to the manufacturer’s specifications. The device(s) shall have an accuracy in degrees Fahrenheit of +/- one (1) percent of the temperature being measured. A temperature recording device shall be provided so that a permanent continuous record is produced.
- 27.b. The chamber temperature of the thermal oxidizer shall be continuously monitored and recorded during operation. Corrective action shall be taken if the 12-hour average temperature is outside the indicator range of 1400 to 1750 degrees F. Operation of the control device when the chamber temperature is outside this indicator range is not, by itself, a violation of this permit.
- 27.c. The permittee shall inspect all veneer dryers for fugitive emissions in accordance with the inspection and maintenance plan required in Condition 8.a.
28. The required efficiency of equipment controlling dryer emissions need not be maintained:
- 28.a. during fuel cell start-ups; or
- 28.b. When the dryers are not operating; or
- 28.c. during previously planned startup and shutdown periods (including bakeouts and washouts); and
- 28.d. during events qualifying as emergencies, including Force Majeure events.
- 28.e. Startup and shutdown periods shall not exceed the minimum amount of time necessary for these events, and during these events the permittee shall minimize emissions to the greatest extent practicable. For the duration of the consent decree, the permittee must, at the beginning of every month, record its maintenance plans for that month. To the extent practical, startup and shutdown of control technology systems will be performed during times when process equipment is also shut down for routine maintenance. [LRAPA 36-005 thru 36-030] and [Condition 13 of consent decree]

Table 11. Emissions Unit Dryers-2 Specific Emission Limits and Standards

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dryers-2	32-010 1.B. 32-010 3.	30	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	30.a
	48-015 2.	29	Fugitive Dust	Minimize Fugitive Dust Emissions	I&M Recordkeeping	29.a

29. **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 in accordance with LRAPA 48-015(2).

29.a. **Monitoring, Testing:** The permittee shall visually survey the facility for any sources of visible emissions in accordance with Condition 4.

29.b. **Recordkeeping:** The permittee shall maintain records of the fugitive emissions surveys, corrective actions (if performed), and/or the results of any modified Method 9 tests performed.

30. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Dryers-2 for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B).]

30.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from veneer dryers control device stack in accordance with Condition 43.

30.b. The permittee shall inspect the veneer dryers for fugitive emissions in accordance with the inspection and maintenance plan required in Condition 8.a.

Table 12. 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	31	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	31.a

31. **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 minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010 (1)(B)]

31.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Press-1 in accordance with Condition 43.

Table 13. Emissions Unit Vat-1 Specific Emission Limits and Standards

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

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

32.a. **Monitoring, Testing:** Monitoring for this applicable requirement shall be the facility-wide visible emission surveys required in Condition 4.

32.b. **Recordkeeping:** The permittee shall maintain records of the fugitive emissions surveys, corrective actions (if performed), and/or the results of any modified Method 9 tests performed in accordance with Condition 4.b.

Table 14. Emissions Unit Mat-1, Mat-2 Specific Emission Limits and Standards

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-1, Mat-2	32-010 1.B.	33	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	33.a
	32-015 2.	34	PM	0.1 gr/dscf	I&M Monitoring	34.a

33. **Applicable Requirement:** The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-1 or Mat-2 for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010(1)(B)]

33.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions units Mat-1 and Mat-2 in accordance with Condition 43.

34. **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 sources in emissions unit Mat-1 or Mat-2. [LRAPA 32-015 (2)]

34.a. **Monitoring (Compliance Assurance Monitoring), Testing:** Equipment maintenance and periodic inspection as well as the visible emission monitoring required in Condition 43 will be used to monitor compliance with this applicable requirement. The permittee shall also check and record pressure drop *each operating day* using the magnehelic gauge(s) on the Mat-1 baghouses. No later than the preceding Wednesday, the permittee shall calculate the previous calendar week’s average pressure drop from the daily readings for that period. The weekly period begins on Sunday and ends on Saturday. If the calendar weekly average pressure drop is outside the indicator ranges stated below, the permittee shall take corrective action. Operation of Mat-1 when the weekly average pressure drop is outside one or more of these indicator ranges is not, by itself, a violation of this permit. [40 CFR 64.3]

34.a.i. The Mat-1 baghouse indicator ranges are:

- 34.a.i.1. Baghouse No. 1: less than 0.5 inches of water or greater than 3.5 inches of water;
- 34.a.i.2. Baghouse No. 2: less than 0.5 inches of water or greater than 3.5 inches of water; and
- 34.a.i.3. Baghouse No. 3: less than 0.2 inches of water or greater than 5.0 inches of water.

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

Table 15. 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.	36	Visible Emissions	20% opacity, 3 min. in 60 min.	VE periodic monitoring	36.a
	48-015 2.	35	Fugitive Dust	Minimize fugitive dust emissions	I&M Recordkeeping	35.a

35. **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 in accordance with LRAPA 48-015-2.

35.a. **Monitoring, Testing:** The permittee shall include emissions unit Mat-3 in the visual survey of the facility in accordance with Condition 4.

35.b. **Recordkeeping:** The permittee shall maintain records of the fugitive emissions surveys, corrective actions (if performed), and/or the results of any modified Method 9 tests performed.

36. **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 minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [LRAPA 32-010-1.B.]

36.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Mat-3 in accordance with Condition 43.

36.b. **Recordkeeping:** The permittee shall maintain records of the fugitive emissions surveys, corrective actions (if performed), and/or the results of any modified Method 9 tests performed.

Table 16. Plywood Rule

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Press-1, Vat-1, Mat-1, Mat-2, and Mat-3	33-060-3.B.	37	PM	1.0 pound pm/ 1000 ft ² (3/8) production	Recordkeeping	37 & 43

37. **Applicable Requirement:** The permittee shall not cause or allow the emission of particulate matter from facility activities/processes (excluding Dryers-1, Dryers-2, Boilers-1, and Cell-1) in excess of 1.0 pounds per 1000 square feet of finished product (3/8 basis). [33-060-3.B.]

37.a. **Monitoring, Testing:** The permittee shall monitor production and materials usage to determine compliance with this applicable requirement. Process throughput data recorded in accordance with Condition 14.a (PSEL monitoring requirements) will be used with approved PSEL emission factors for the identified sources to estimate particulate matter emission rates and determine compliance.

37.b. **Recordkeeping:** The permittee shall maintain records in accordance with Condition 14.a.

Table 17. Emissions Unit Roads-U Specific Emission Limits and Standards

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Roads-U	32-010 1.B.	39	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	39.a
	48-015 2.	38	Fugitive Dust	Minimize fugitive dust emissions	I&M Recordkeeping	38.a

38. **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 in accordance with LRAPA 48-015(2)

38.a. **Monitoring, Testing:** The permittee shall include emission unit Roads-U in the visual survey of the facility in accordance with Condition 4.

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

39.a. **Monitoring, Testing:** The permittee shall monitor visible emissions from emissions unit Roads-U in accordance with Condition 4.

Table 18. General Emission Limits and Standards that apply to Insignificant Activities

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard
32-010 1.B.	40	Opacity	20%
32-030	40	PM/PM ₁₀	0.1 gr/dscf
32-015 2.	40	PM/PM ₁₀	0.1 gr/dscf

40. LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions [OAR 340-204-0010] exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 40.a. LRAPA 32-010-1.B. (20% opacity)
 - 40.b. LRAPA 32-030 (0.1 gr/dscf corrected to 12% CO₂ or 50% excess air for fuel burning equipment)
 - 40.c. LRAPA 32-015 (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)
 - 40.d. LRAPA 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment)
41. **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 the Department’s Source Sampling Manual.

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

42. Unless otherwise specified in this permit, the permittee shall conduct all testing in accordance with the ODEQ's *Source Sampling Manual*.
- 42.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.
- 42.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.
- 42.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
- 42.c.i. At least 90% of the design capacity for new or modified equipment;
 - 42.c.ii. At least 90% of the maximum operating rate for existing equipment; or
 - 42.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.
- 42.d. Each source test must consist of at least three (3) test runs and the emissions results must be reported as the arithmetic average of all valid test runs. If for reasons beyond the control of the permittee a test run is invalid, LRAPA may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 42.e. Source test reports prepared in accordance with ODEQ's Source Sampling Manual must be submitted to LRAPA within 45 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.

GENERAL MONITORING REQUIREMENTS [OAR 340-218-0050(3)(a)]

43. On the schedule contained in Conditions 43.a.i through 43.a.iii, 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. 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.

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

- 43.a.i. At least once (one six (6) minute observation) during each start-up of the fuel cell: Cell-1
- 43.a.ii. Initially, weekly for the following:

Table 43.a.ii: Weekly Visible Emission Monitoring Points	
<u>Emissions Unit</u>	<u>Monitoring Point</u>
Dryer-1	RTO Exhaust Stack

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

Table 43.a.iii: Monthly Visible Emission Monitoring Points	
<u>Emissions Unit</u>	<u>Monitoring Point</u>
Boiler-1	Boiler Stacks
Mat-1, Mat-2, and Mat-3 point exhausts	Baghouse Stacks, Cyclone Stacks, and other emission points

- 43.a.iv. Initially, quarterly for the following emissions units:

Table 43.a.iv: Quarterly Visible Emission Monitoring Points	
<u>Emissions Unit</u>	<u>Monitoring Point</u>
Press-1	Press vents (forms to mention cycle times)

43.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).

43.c. If the weekly surveys in Table 43.a.ii conducted during four (4) consecutive weeks do not result in the need for corrective action, the surveys need only be done once per month.

43.d. If the monthly surveys in Table 43.a.iii conducted during four (4) consecutive months do not result in the need for corrective action, the surveys need only be done once per quarter.

- 43.d.i. If visible emissions are detected at the emission unit boundary for more than 5% (18 seconds) of

the survey time, the permittee performs the following:

- 43.d.ii. Modified EPA Method 9 shall be used to determine opacity in accordance with the 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 minutes unless any one 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, or an exceedance of the applicable requirement is documented, whichever is a shorter period. The permittee shall record the results of the Modified EPA Method 9 tests.
- 43.e. The permittee shall record the corrective action taken or the results of the modified EPA Method 9 tests.
- 43.f. If an exceedance occurs, the survey and/or observation frequency for the affected monitoring point will start over with the initial frequency specified in Conditions 43.a.i through 43.a.iii.
- 43.g. 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.
- 43.h. 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.
- 44. The permittee shall conduct emission factor verification tests in accordance with the ODEQ's *Source Sampling Manual* for the emission units/emission factors identified as requiring testing in Condition 14.c (Dryer-1 criteria pollutants excluding SO₂ and lead) at least once during the permit term. Testing performed in compliance with Condition 24.b shall meet this requirement. [OAR-340-220-170(1)].
 - 44.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 the ODEQ's *Source Sampling Manual*.
 - 44.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:
 - 44.b.i. emissions unit and monitoring point identification;
 - 44.b.ii. emission results in pounds per hour and emission factor units;
 - 44.b.iii. process parameters during the test (e.g., material throughput, steam production, etc.); and
 - 44.b.iv. control device operating parameters.

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

45. The permittee shall maintain the following general records where applicable for monitoring required by this permit:
- 45.a. the date, place as defined in the permit, and time of sampling or measurements;
 - 45.b. the date(s) analyses were performed;
 - 45.c. the company or entity that performed the analyses;
 - 45.d. the analytical techniques or methods used;
 - 45.e. the results of such analyses;
 - 45.f. the operating conditions as existing at the time of sampling or measurement; and
 - 45.g. the records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
46. The permittee shall maintain the following specific records where applicable for required monitoring information:
- 46.a. monthly facility fugitive emissions inspection, maintenance, and corrective action log;
 - 46.b. visible emissions tests and surveys;
 - 46.c. pollution control device(s) inspection, maintenance, and repair log;
 - 46.d. wet ESP corrective action log;
 - 46.e. Dryers-2 fugitive emissions inspection and corrective action log;
 - 46.f. monthly and annual Boilers-1 fuel used per Condition 14.a;
 - 46.g. daily and annual Dryers-1 throughput (MSF - 3/8" basis);
 - 46.h. daily and annual records of redry veneer processed (MSF, 3/8" basis)
 - 46.i. daily and annual press-1 plywood throughput (MSF - 3/8" basis);
 - 46.j. excess emissions log; and
 - 46.k. monthly and annual pollutant emissions for the entire facility.
47. 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. [OAR 340-218-0050(b)(B)]
48. 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 records(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. [OAR 340-218-0050(3)(b)]

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

49. Excess Emissions Reporting [LRAPA 36-001 through 36-030]

- 49.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.
- 49.b. Notification shall be made to LRAPA. The current LRAPA telephone number is 541-736-1056.
- 49.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 answering machine and also shall call the Oregon Accident Response System (OARS). The OARs current number is 1-800-452-0311.
- 49.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.
- 49.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.
- 49.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.
50. 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 seven (7) 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)]
51. The permittee shall submit three (3) copies of the semi-annual monitoring report, covering the period January 1 to June 30, using LRAPA approved forms by August 30, unless otherwise approved in writing by LRAPA. Two copies of the report shall be submitted to LRAPA and one copy to the EPA. The semi-annual monitoring report shall include the semi-annual compliance certification.

52. 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 copies of the report shall be submitted to LRAPA and one copy to the EPA.
- 52.a. The annual monitoring report shall consist of:
- 52.a.i. annual records of production and process information identified in Condition 13;
 - 52.a.ii. the excess emissions upset log; [OAR 340-214-0340 (LRAPA 36-025)] and
 - 52.a.iii. the second semi-annual compliance certification. [OAR 340-218-0080]
53. The emission fee report shall be due, as specified by LRAPA, after January 15.
54. Other reporting requirements include the following:
- 54.a. source test plans; and
 - 54.b. emission factor verification testing summaries.
55. 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)]
- 55.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 55.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 shall 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 conditions that are incorporated by reference. When certifying compliance with new applicable conditions that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator also shall 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;
 - 55.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 55.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
 - 55.d. Such other facts as LRAPA may require to determine the compliance status of the source.
 - 55.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)]
 - 55.f. Number of CAM excursions and corrective action.
56. The regulatory agencies' addresses are as follows, (unless otherwise instructed by LRAPA):

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

Office of Air Quality
US Environmental Protection Agency
Mail Stop OAQ-107
1200 Sixth Avenue
Seattle, WA 98101
(206) 553-4273

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 version 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 by LRAPA 47-001 through 47-030.

G7. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0210 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee shall comply with OAR 340-248-0210 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, 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)]

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.

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 OAR 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

MH/cmw
7/29/08