LANE REGIONAL AIR PROTECTION AGENCY
OREGON TITLE V OPERATING PERMIT

Lane Regional Air Protection Agency
1010 Main St.
Springfield, OR 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:

Veneer Technologies –Eugene, OR
195 North Bertelsen Road
Eugene, Oregon 97402

PLANT SITE LOCATION:

195 North Bertelsen
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application Number: 208256
Received: June 12, 2003

LAND USE COMPATIBILITY STATEMENT:

Issued by: Lane County
Dated: 9/5/96

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

Merlyn L. Hough Director

July 7, 2008
Date

Nature of Business:

SIC:
Laminated Veneer Lumber Manufacturing 2439

RESPONSIBLE OFFICIALS

Title: Veneer Technologies –Eugene Unit Manager
Phone: (541) 689-5331

FACILITY CONTACT PERSON

Name: Larry Sanderson
Title: Eugene Plant Environmental Manager
Phone: (541) 607-8372

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
BDT	Bone dry ton
BDU	Bone dry unit
BF	Board feet
Btu	British thermal unit
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CPMS	Continuous parameter monitoring system
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission factor
ERC	Emission Reduction Credit
EPA	US Environmental Protection Agency
EPI	Epichlorohydrin
EU	Emissions Unit
FCAA	Federal Clean Air Act
FSA	Fuel sampling and analysis
gr/dscf	Grain per dry standard cubic foot (1 pound = 7000 grains)
HAP	Hazardous Air Pollutant as defined by OAR 244-0040
HCFC	Halogenated Chloro-Fluoro-Carbon
HCOH	Formaldehyde
ID	Identification number
I&M	Inspection and maintenance
LRAPA	Lane Regional Air Protection Agency
M	1,000
MM	1,000,000
MB	Material Balance
MBF	1,000 Board feet
MSF	1,000 Square feet 3/8" basis
MSDS	Material Safety Data Sheets
NA	Not applicable
NESHAP	National Emission Standard for Hazardous Air Pollutants
NO_x	Nitrogen oxides
NSPS	New Source Performance Standards
O_2	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
OSHA	Occupational Safety and Health Administration
O&M	Operation and maintenance
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
PM_{10}	Particulate matter less than 10 microns in size
ppmv	Parts per million by volume
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	pounds per square inch, actual
RMP	Risk Management Plan
RTO	Regenerative Thermal Oxidizer
SERP	Source emissions reduction plan
SO_2	Sulfur dioxide
ST	Source test
UF	Urea Formaldehyde
UFC	Urea-Formaldehyde Concentrate
VE	Visible emissions
VMT	Vehicle miles traveled
VOC	Volatile organic compounds

DEFINITIONS

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 Reference Method 9. For all standards, the minimum observation period must 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 greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Reference Method 9 reading represents 15 seconds of time. [See also the definition of "Opacity" in OAR 340-208-0010]

For the purposes of this permit "day" shall mean a calendar 24 hour period, "week" shall mean a calendar week starting at 12:01 am on Sunday morning and "month" shall mean calendar month.

TABLE OF TABLES

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(2)]

2. All conditions in this permit are federally enforceable except as specified below:

   2.a. Conditions 6, 7, 8 and G4 are only enforceable by LRAPA. [OAR 340-218-0060]
   2.b. Attachment 1 of this permit provides a cross-reference for SIP rules 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(3)]:

Table 1. Emission Unit and Pollution Control Device Identification

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Wood Residual Handling System	WRH	Baghouses 1, 2, & 3	BH-1, BH-2, & BH-3
Laminated Veneer Lumber (LVL) Presses 1-11	Presses	None	NA
I-Line Process	I-Line	None	NA
I-Line Oven	I-Oven	None	NA
Press Heaters	Press Heaters	None	NA
Aggregate Insignificant – includes: Carpentry Shop (PM/PM_{10}) Fire Suppression Abort (PM/PM_{10}) Misc. Hand Tool Use (PM/PM_{10}) Press Lube Emissions (PM/PM_{10}) Product Sealant (VOC) Ink (VOC) Sawdust Dumpsters (PM/PM_{10}) Billet Reclaim Saw (PM/PM_{10})	AI	None	NA

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING, AND RECORDKEEPING REQUIREMENTS

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements 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	Averaging Time	Testing Condition	Monitoring Condition
48-015(2)	4	Fugitive emissions	minimize	NA	NA	5
50-020	6	Nuisance	no nuisance	NA	NA	8
32-055	7	PM >250μm	no fallout	NA	NA	8
32-065(2)(A)	9.a.i	#1 Distillate oil sulfur content	0.3 percent by weight	each shipment	NA	10
32-065(2)(B)	9.a.ii	#2 Distillate oil sulfur content	0.5 percent by weight	each shipment	NA	10
32-065(1)	9.a.iii	Residual oil sulfur content	1.75 percent by weight	each shipment	NA	10
40 CFR Part 68	11	Risk management	Risk management plan	NA	NA	11
40 CFR Part 63 Subpart DDDD Plywood and Composite Wood Products NESHAP	12	HAPs	As Applicable	NA	NA	13

4. Applicable Requirement: The permittee shall not allow or permit 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. Such reasonable precautions must include, but not be limited to the following: [LRAPA 48-015(2)]

4.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;

4.b. Application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;

4.c. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;

4.d. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;

4.e. Adequate containment during sandblasting or other similar operations; and

4.f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.

5. Monitoring Requirement: At least once each week that the plant is operating, the permittee shall visually survey the facility using EPA Method 22 for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions, lasting more than 5% of the survey time (or 18 seconds), that leave the plant site. The visible emissions survey may be conducted simultaneously on multiple emission points when they are in the same field of view for the observer. The person conducting the observation does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedure of EPA Method 9, including the proper location to observe visible emissions. If sources of excess fugitive emissions are identified, the permittee shall: [OAR 340-218-0050(3)(a)]

5.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in condition 4; or

5.b. Recordkeeping: The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any modified EPA Method 9 tests.

Nuisance Conditions

6. 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 enforceable only by LRAPA.

7. Applicable Requirement: The permittee shall not cause or permit the emission of any particulate matter which is larger than 250 microns in size provided such particulate matter does or will deposit upon real property of another person. [LRAPA 32-055] This condition is enforceable only by LRAPA.

8. Monitoring Requirement: The permittee shall provide LRAPA with written notification after five (5) working days of all unresolved nuisance complaints received by the permittee during the operation of the facility, and shall maintain a log of each complaint. Documentation shall include date of complaint, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, whether the complaint is valid, and date and time of response to complainant. A plant representative shall immediately investigate the condition following the receipt of a written nuisance complaint or a nuisance complaint received by phone or facsimile by the responsible official or a designated appointee and a plant representative shall provide a response to the complainant if possible within two (2) working days, but not longer than five (5) working days. This condition is only enforceable by LRAPA.

Fuel Conditions

9. Applicable Requirement: The permittee shall not burn any fuel other than natural gas, propane, butane, ASTM grade fuel oils, or on-specification used oil.

9.a. Fuel oils must not contain more than:

9.a.i. 0.3% sulfur by weight for ASTM Grade 1 distillate oil; [LRAPA 32-065(2)(A)]
9.a.ii. 0.5% sulfur by weight for ASTM Grade 2 distillate oil; [LRAPA 32-065(2)(B)]
9.a.iii. 1.75% sulfur by weight for residual oil; [LRAPA 32-065(1)]

9.b. The permittee is allowed to use on-specification used oil (as defined in 40 CFR 279.11) that contains no more than 0.5% sulfur by weight.

10. Monitoring Requirement for Condition 9: The permittee must monitor the sulfur content of each shipment of fuel oil (ASTM Grade 1, or ASTM Grade 2) that will be used in auxiliary equipment other than exempt equipment such as forklifts and motor vehicles by: [OAR 340-218-0050(3)(a)]
    10.a. obtaining a certification of sulfur content from each vendor for each shipment of fuel received; or
    10.b. secure a MSDS from the fuel supplier and a certification stating that the supplier will provide only fuel oil that meets the specifications in Condition 9 for use in non-exempt or auxiliary equipment such as stationary fire water pump motors.

Accidental Release Prevention

11. Applicable Requirement: Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then the permittee must 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]

NESHAP

12. Applicable Requirement: Commencing October 1, 2007, the permittee shall use exclusively non-HAP coatings for Group 1 Miscellaneous Coating Operations. [40 CFR 63.2241(a)]

    12.a. For purposes of this requirement, "non-HAP coatings" are defined as coatings with HAP contents below 0.1 percent, by mass, for OSHA-defined carcinogens as specified in 29 CFR 1910.1200(d)(4), and below 1.0 percent, by mass, for other HAP compounds.
    12.b. For purposes of this requirement, "Group 1 Miscellaneous Coating Operations" are defined as application of edge seals, nail lines, logo (or other informational) paint, shelving edge fillers, trademark/gradestamp inks, and wood putty patches to plywood and composite wood products.

13. Monitoring Requirement: The permittee shall maintain records documenting that only non-HAP coatings are used for Group 1 Miscellaneous Coating Operations. [40 CFR 63; Subpart DDDD; Table 6 and Table 8]

14. Reporting Requirement: The permittee shall submit a signed statement that it is using only non-HAP coatings for Group 1 Miscellaneous Coating Operations. This initial statement shall be submitted no later than October 30, 2007. Subsequent statements shall be included with the semi-annual compliance certification. [40 CFR 63; Subpart DDDD; Table 6]

15. Recordkeeping Requirement: The permittee shall maintain a copy of each notification and report submitted to comply with this applicable requirement, including all documentation supporting any Initial Notification or Notification of Compliance Status. [40 CFR 63.2282(a)(1)]

Table 3. Emissions Unit WRH Requirements

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard	Testing Condition	Monitoring Condition
32-010-1.B and 40 CFR 64.3(b)(4)(iii)	16	Visible Emissions	20% opacity, 3 min. in 60 min.	17	18 and 19
32-015-2 and 40 CFR 64.3(b)(4)(iii)	20	PM	0.1 gr/dscf	N/A	21
32-045	22	PM	Process Weight Limit	N/A	21

16. Applicable Requirement (WRH Opacity Limits)

The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit WRH 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)]

17. Testing Requirement(s): (Testing for WRH Opacity)

There are no testing requirements for this applicable requirement.

18. Monitoring Requirement(s): (Monitoring for WRH Visible Emissions)

In addition to the monitoring required by Condition 21.b, the permittee shall monitor visible emissions into the atmosphere from emissions unit WRH in accordance with the following procedures, test methods, and frequencies:

18.a. EPA Reference Method 9 shall be used to determine opacity, in accordance with ODEQ's Source Sampling Manual. Prior notification and a pre-test plan are not required to be submitted to the LRAPA for each test or survey conducted. Each observation period shall be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period shall be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.

18.b. Visible emissions testing, using EPA Reference Method 9, may be waived for emission unit WRH provided both of the following conditions are met:

18.b.i. The permittee shall conduct a 6-minute visible emissions survey of each emissions unit, using EPA Reference Method 22; and

18.b.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.

18.c. The permittee shall use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:

18.c.i. The initial monitoring frequency for performing visible emission tests and/or surveys shall be monthly.

18.c.ii. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 16, the surveys and/or observations need only be done once per quarter.

18.c.iii. If an exceedance occurs, the surveys and/or observations for the exceeding monitoring point will start over with monthly surveys and/or observations, according to the monitoring frequency above.

18.c.iv. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 16, the surveys and/or observations need only be done once per quarter.

18.d. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.

18.e. If the observer is unable to conduct the survey and/or EPA Reference 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, the observer shall note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.

19. Monitoring Requirement(s): (Inspection and Maintenance Requirements for WRH Visible Emissions)

The permittee shall maintain records of inspection and maintenance procedures for the baghouses for emissions unit WRH:

19.a. Monthly inspection records of the WRH system (piping, cyclones, and baghouses) recorded on inspection forms.

19.b. Maintenance activity records of replacement of baghouse bags on occurrence (when broken and routinely) recorded in a maintenance log.

20. Applicable Requirement (WRH Grain Loading Requirements)

The permittee shall not cause or allow the emission of particulate matter, in excess of 0.1 grain per standard cubic foot, from the point sources (i.e., non-fugitive) within emissions unit WRH. [LRAPA 32-015-2]

21. Monitoring Requirement(s): (Compliance Assurance Monitoring Requirements for WRH Grain Loading)

21.a. The permittee shall maintain records of inspection and maintenance procedures for the baghouses for emissions unit WRH as required by Condition 19.

21.b. The permittee shall check and record pressure drop each operating day using the Magnehelics on each baghouse in WRH. No later than the proceeding 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 exceeds 3.0 inches of water then the permittee shall take corrective action. Operation of WRH when the weekly average pressure drop exceeds 3.0 inches of water is not, by itself, a violation of this permit.

22. Applicable Requirement (Process Weight Rule Requirements)

The permittee shall not cause or allow the emission of particulate matter in any one (1) hour from any baghouses included in emissions units WRH in excess of the amount shown in Table 1, LRAPA 32-045, for the process weight allocated to the process. [LRAPA 32-045]

Table 4. Emissions Units I-oven and Presses Specific Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/ Standard	Testing Condition	Monitoring Condition
32-010-1.B	23	Visible Emissions	20% Opacity, 3 min in 60 min	24	25 and 26

23. Applicable Requirement (I-Line Oven and Presses Visible Emissions Applicable Requirement):

The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions units Presses, or I-Line Oven 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]

24. Testing Requirement (I-Line Oven and Presses Visible Emissions Testing Requirement):

No testing is required for this condition at this time.

25. Monitoring Requirement (Fugitives, I-Line Oven and Presses Visible Emissions Monitoring Requirement)

25.a. Monitoring for fugitives shall be performed as required in Condition 5.

26. Monitoring Requirement (Presses Visible Emissions Monitoring Requirements)

The permittee shall monitor visible emissions into the atmosphere from emissions unit Presses in accordance with the following procedures, test methods, and frequencies:

26.a. EPA Reference Method 9 shall be used to determine opacity, in accordance with ODEQ's Source Sampling Manual. Prior notification and a pre-test plan are not required to be submitted to the LRAPA for each test or survey conducted. Each observation period shall be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period shall be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.

26.b. Visible emissions testing, using EPA Reference Method 9, may be waived for emission unit Presses provided both of the following conditions are met:

26.b.i. The permittee shall conduct a 6-minute visible emissions survey of each emissions unit, using EPA Reference Method 22; and

26.b.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.

26.c. The permittee shall use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:

26.c.i. The initial monitoring frequency for performing visible emission tests and/or surveys shall be monthly.

26.c.ii. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 16, the surveys and/or observations need only be done once per quarter.

26.c.iii. If an exceedance occurs, the surveys and/or observations for the exceeding monitoring point will start over with monthly surveys and/or observations, according to the monitoring frequency table above.

26.c.iv. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 16, the surveys and/or observations need only be done once per quarter.

26.d. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions.

26.e. If the observer is unable to conduct the survey and/or EPA Reference 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, the observer shall note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee shall attempt to make the observations daily until a valid observation period is completed.

Insignificant Activities Requirements

27. LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 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:

27.a. LRAPA 32-010(1)(B) (20% opacity)
27.b. LRAPA 32-030 (0.1 gr/dscf corrected to 12% CO_2 or 50% excess air for fuel burning equipment)
27.c. LRAPA 32-015(2) (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)
27.d. LRAPA 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment)

28. 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.

PLANT SITE EMISSION LIMITS

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

Table 5. Annual (12-month rolling) PSELs (tons)

Pollutant	Assigned Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)	Emission Reduction Credit(tons/yr)
PM	4.0	0	19.4
PM_{10}	2.6	0	19.4
SO_2	<0.5	0	--
NO_x	7.8	0	15.6
CO	3.1	0	--
VOC	55.1	0	--

29.a. The Emission Reduction Credits (ERCs) in Table 5 are available for *internal or external* use by the permittee for increases of emissions or for sale, consistent with LRAPA Rules and Regulations, upon receipt of written approval by the Director. ***The credits shall expire on April 2, 2016.***

30. Monitoring Requirement: [OAR 340-218-0050(3)]

The permittee shall determine compliance with the PSELs using the following monitoring and 12-month rolling calculation procedures:

30.a. Monitoring Requirement: [OAR 340-218-0050(3)]

The permittee shall monitor and maintain records of the following process parameters:

Table 6. Recordkeeping of Process Parameters

Emissions Unit(s)	Process Parameter	Pollutant(s)	Measurement Technique	Measurement Frequency
I-Oven and Press Heaters	Natural gas used (MMcf/month, MMcf/yr)	PM, PM_{10}, CO, NO_X, SO_2, and VOC	Recordkeeping	Monthly
WRH	Amount of wood residuals trucked off site	PM and PM_{10}	Production Records	Monthly
Presses and I-Line	Amount and type of adhesive used	VOC	Purchase Records	Monthly

30.b. Monitoring Requirement: [OAR 340-218-0050(3)]

The permittee shall determine compliance with the PSELs by calculating 12-month rolling emissions for each emissions units using the following formula and process parameters listed above, and the emission factors listed in Condition 31:

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

where:

- E = pollutant emissions in tons/yr
- P_{eu} = process parameter identified in Condition 30.a
- Ef_{eu} = emission factor identified for each emissions unit and pollutant in Condition 31.
- K = conversion constant is 1 for monthly emissions calculation and 1 ton/2000 lbs for annual emissions calculations.

31. Monitoring Requirement: [OAR 340-218-0050(3)]

Table of emission factors to be used for calculating emissions:

Table 7. Emission Factors

Emissions Unit(s)	Pollutant	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
				Yes/No	Test Method
WRH	PM (non-fugitive)	0.001	lb/BDT	No	NA
	PM_{10} (non-fugitive)	0.001	lb/BDT	No	NA
	PM (fugitive)	0.086	lb/BDT	No	NA
	PM_{10} (fugitive)	0.029	lb/BDT	No	NA
I-Oven and Press Heaters	PM	12.0	lb/MMscf	No	NA
	PM_{10}	12.0	lb/MMscf	No	NA
	CO	40.0	lb/MMscf	No	NA
	NO_x	100.0	lb/MMscf	No	NA
	SO_2	0.6	lb/MMscf	No	NA
	VOC	11.0	lb/MMscf	No	NA
I-Line Process	VOC	0.004	lb/lb adhesive	No	NA
Presses	VOC	0.0027	lb/lb adhesive	No	NA

GENERAL TESTING REQUIREMENTS

32. Unless otherwise specified in this permit, the permittee shall conduct all testing in accordance with the ODEQ *Source Sampling Manual*. [LRAPA 34-070]

32.a. Unless otherwise specified by a state or federal regulation, the permittee shall submit a source test plan to LRAPA at least 15 days prior to the date of the test. The test plan must be prepared in accordance with ODEQ's *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 15 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.

32.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.

32.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests shall be performed as follows:

32.c.i. at 90 to 110% of the maximum design capacity for initial performance tests on new or modified equipment; or

32.c.ii. 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 no less than 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. Average hourly operating rates can be determined by taking daily operating data and dividing by the number of hours of operation.

32.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.

33. The permittee shall conduct emission factor verification tests on a representative emissions unit in accordance with the ODEQ's *Source Sampling Manual* for the emission units/emission factors identified in Condition 31 at least once during the permit term. ***The emission factor verification tests shall be conducted within 180 days after issuance of this permit.***

33.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.

33.b. The permittee shall submit a summary of all emission factor verification tests required pursuant to this permit 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. The summary shall include the following information:

33.b.i. emissions unit and monitoring point identification;
33.b.ii. emission results in pounds per hour;
33.b.iii. process parameters during the test (e.g., material throughput, steam production, etc.);
33.b.iv. control device operating parameters.

33.c. The emissions factors listed in Condition 31 are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs shall only be determined by the calculations contained in Condition 30.b of this permit using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 31, or others approved by LRAPA.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Monitoring Requirements:

34. The permittee shall not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]

35. Methods used to determine actual emissions for fee purposes shall also be used for compliance determination and may be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]

36. Monitoring requirements shall commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

General Recordkeeping Requirements

37. The permittee shall maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]

37.a. The date, place as defined in the permit, and time of sampling or measurements;
37.b. The date(s) analyses were performed;
37.c. The company or entity that performed the analyses;
37.d. The analytical techniques or methods used;
37.e. The results of such analyses;
37.f. The operating conditions as existing at the time of sampling or measurement; and
37.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).

38. The permittee shall maintain specific records of required monitoring information that include the following:

38.a. Weekly, monthly facility fugitive emissions inspection, maintenance, and corrective action log;
38.b. Visible emissions tests and surveys;
38.c. Pollution control device(s) inspection, maintenance, and repair log;
38.d. Monthly and annual I-Line adhesive used;
38.e. Monthly and annual LVL adhesive used;
38.f. Monthly and annual natural gas used in I-Oven and Press Heaters;
38.g. Monthly and annual truck-loading materials;
38.h. Excess emissions log;
38.i. Short- and long-term pollutant emissions for the entire facility;
38.j. Control device operating parameter logs; and

39. 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 due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [OAR 340-214-0110, 340-212-0160, and 340-218-0050(3)(b)]

40. Recordkeeping requirements shall commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]

41. Unless otherwise specified, 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 (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [OAR 340-218-0050(b)(B)]

REPORTING REQUIREMENTS

42. Excess Emissions Reporting: The permittee shall report all excess emissions in accordance with LRAPA 36-001 through 36-040. In summary, the permittee must immediately (i.e., as soon as possible but in no case more than one hour after a source knew or should have known of an excess emission period) notify LRAPA by telephone or in person of any excess emission, other than pre-approved startup, shutdown, or scheduled maintenance. Notification must, 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 must be made in accordance with LRAPA direction and LRAPA 36-020(2) and 36-025.

42.a. 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 LRAPA at 541-736-1056.

42.b. 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 LRAPA 36-010 and 36-015. New or modified procedures must be received by LRAPA in writing at least 72 hours prior to the first occurrence of the excess emission event. The permittee must abide by the approved procedures and have a copy available at all times.

42.c. 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.

42.d. 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.

42.e. Notwithstanding the immediate reporting requirement specified above, the permittee may make initial reports of excess emissions as soon as possible but in no case later than the end of the first working day following the excess emissions period. [LRAPA 36-005(3)]

43. 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" is defined in OAR 340-218-0050(3)(c)(B). Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with LRAPA 36-025. [OAR 340-218-0050(3)(c)(B)]

44. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5);[OAR 340-218-0050(3)(c)(D)]

45. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

Addresses of regulatory agencies are the following, unless otherwise instructed:

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

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

Semi-annual and Annual Reports

46. The permittee shall submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by LRAPA. Six month periods are January 1 to June 30, and July 1 to December 31. Two copies of the report must be submitted to LRAPA, and one copy to the EPA. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]]

46.a. The semi-annual report is due on August 30 and must include the semi-annual compliance certification, OAR 340-218-0080.

46.b. The annual report is due on March 15 and must consist of the following:

46.b.i. the emission fee report; [OAR 340-220-0100]

46.b.ii. the NO_x and VOC emission statement, if applicable; [OAR 340-214-0220];

46.b.iii. the excess emissions upset log; [OAR 340-214-0340]

46.b.iv. the second semi-annual compliance certification; and [OAR 340-218-0080]

46.b.v. the annual certification that the risk management plan is being properly implemented or confirmation that the risk management plan requirements have not been triggered; OAR 340-244-0230. [OAR 340-218-0080(7)]

46.b.vi. the parameters and calculations required by condition 30.

47. The semi-annual compliance certification shall 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)]

47.a. The identification of each term or condition of the permit that is the basis of the certification;

47.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;

47.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 47.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

47.d. Such other facts as LRAPA may require to determine the compliance status of the source.

47.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required in 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)]

47.f. Number of CAM excursions and corrective action.

47.g. A signed statement certifying compliance with the requirements in Condition 12.

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in this permit 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 this 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 must comply with all conditions of this 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 is supplemental to, and does 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 must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

G4. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400]

G5. 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]

G6. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(c)(D), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit must contain certification by a responsible official of truth, accuracy and completeness. All certifications must 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 must promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

G7. Open Burning [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0200.

G8. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G9. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, OAR 340-260-0040]

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

G10. Permit Shield [OAR 340-218-0110]

a. Compliance with the conditions of the permit is 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 alters or affects 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

G11. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee must allow the 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 an Oregon 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 state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G12. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must 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 must submit payment to the LRAPA, 1010 Main St, 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 must be submitted in writing to LRAPA. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G13. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

a. The permittee must 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), must be submitted to LRAPA and the EPA.

c. The permittee must 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 G10 does not extend to off-permit changes.

G14. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

a. The permittee must 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 must be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).

c. The permit shield of condition G10 does not extend to section 502(b)(10) changes.

G15. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit must be requested and granted in accordance with OAR 340-218-0150. The permittee must 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.

G16. Minor Permit Modification [OAR 340-218-0170]

The permittee must submit an application for a minor permit modification in accordance with OAR 340-218-0170.

G17. Significant Permit Modification [OAR 340-218-0180]

The permittee must submit an application for a significant permit modification in accordance with OAR 340-218-0180

G18. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding conditions G16 and G17, 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.

G19. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

G20. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an air contaminant discharge permit (ACDP) from LRAPA and having satisfied the requirements of OAR 340, Division 224.

G21. Need to Halt or Reduce Activity Not a Defense [OAR 340-218-0050(6)(b)]

The need to halt or reduce activity will not be a defense. It will 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.

G22. Duty to Provide Information [OAR 340-218-0050(6)(e) and OAR 340-214-0110]

The permittee must 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 must 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.

G23. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
b. A permit must 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 must follow the same procedures as apply to initial permit issuance and affect only those parts of the permit for which cause to reopen exists.

G24. 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.

G25. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

a. This permit expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
b. Applications for renewal must 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 must provide no less than six (6) months for the owner or operator to prepare an application.
c. Provided the permittee submits a timely and complete renewal application, this permit will remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G26. 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).

G27. Property Rights [OAR 340-200-0020 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.

G28. Permit Availability [OAR 340-200-0020 and 340-218-0120(2)]

The permittee must have available at the facility at all times a copy of the Oregon Title V Operating Permit and must 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 St.
Springfield, OR 97477
(541) 736-1056

MAX/cmw
06/30/08

LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT REVIEW REPORT

Veneer Technologies – Eugene, OR
195 North Bertelsen Road
Eugene, Oregon 97402

TABLE OF CONTENTS

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS REVIEW REPORT

ACDP	Air Contaminant Discharge Permit
Act	Federal Clean Air Act
ASTM	American Society of Testing and Materials
BDT	Bone dry ton
BDU	Bone dry unit
BF	Board feet
Btu	British thermal unit
CEMs	Continuous emission monitoring system
CFR	Code of Federal Regulations
CO	Carbon Monoxide
CPMS	Continuous parameter monitoring system
DEQ	Department of Environmental Quality
dscf	Dry standard cubic feet
EF	Emission factor
EPA	US Environmental Protection Agency
ERC	Emission Reduction Credit
EU	Emissions Unit
FCAA	Federal Clean Air Act
FSA	Fuel sampling and analysis
gr/dscf	Grain per dry standard cubic foot (1 pound = 7000 grains)
HAP	Hazardous Air Pollutant as defined by OAR 244-0040
HCFC	Halogenated Chloro-Fluoro-Carbons
HCOH	Formaldehyde
ID	Identification number
I&M	Inspection and maintenance
LRAPA	Lane Regional Air Protection Agency
M	1,000
MM	1,000,000
MB	Material Balance
MBF	1,000 Board feet
MSF	1,000 Square feet 3/8" basis
MSDS	Material Safety Data Sheets
MeOH	Methanol
NA	Not applicable
NO_x	Nitrogen oxides
NESHAP	National Emission Standard for Hazardous Air Pollutant
NSPS	New Source Performance Standards
NSR	New Source Review
O_2	Oxygen
OAR	Oregon Administrative Rules
ODEQ	Oregon Department of Environmental Quality
ORS	Oregon Revised Statutes
O&M	Operation and maintenance
PF	Phenol-Formaldehyde
Pb	Lead
PCD	Pollution Control Device
PM	Particulate matter
PM_{10}	Particulate matter less than 10 microns in size
ppmv	Parts per million by volume
ppm	Parts per million
PSEL	Plant Site Emission Limit
psia	pounds per square inch, actual
RTO	Regenerative Thermal Oxidizer
SCHED	Schedule
SERP	Source emissions reduction plan
SPEC	Special
SO_2	Sulfur dioxide
ST	Source test
VE	Visible emissions
VMT	Vehicle miles traveled
VOC	Volatile organic compounds

INTRODUCTION

1. This is an existing facility applying for a renewal of its existing Title V federal operating permit.

   In accordance with OAR 340-218-0120, this review report is intended to provide the legal and factual basis for the draft permit conditions. In most cases, the legal basis for a permit condition is included in the permit by citing the applicable regulation. In addition, the factual basis for the requirement may be the same as the legal basis. However, when the regulation is not specific and only provides general requirements, this review report is used to provide a more thorough explanation of the factual basis for the draft permit conditions.

PERMITTEE IDENTIFICATION

2. Veneer Technologies – Eugene, OR operates a laminated veneer lumber manufacturing facility located at 195 North Bertelsen Road in Eugene, Oregon.

FACILITY DESCRIPTION

3. The Eugene plant receives dry veneer from outside suppliers. In theLaminated Veneer Lumber (LVL) presses, the prepared veneer is subjected to glue, heat, and pressure creating a LVL billet. Some ofthe LVL billets are transferred to the I-joist department where they are made into flanges for I-joists. Following this I-joist fabrication process, the I-joists are heat cured in an oven. Once cured, they are cut to length and shipped to market. The remaining LVL billets not destined for I-joist flanges are transferred to a secondary manufacturing department in the plant where they are ripped into a variety of widths and lengths for shipment to market as well. Wood residuals are generated throughout the manufacturing process and collected by way of a pneumatic system controlled by baghouses. Pollutants emitted from the process include NO_X, CO, VOC, SO_2, and PM/PM_{10} from gas combustion, VOCs (primarily methanol, formaldehyde, and phenol) from glue curing in the LVL presses and I-joist oven, and PM/PM_{10} from wood residual handling.

OPERATING SCENARIO

4. The facility has a single operating scenario.

EMISSIONS UNIT AND POLLUTION CONTROL DEVICE IDENTIFICATION

5. The emissions units at this facility are the following:

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Wood Residual Handling System	WRH	Baghouses 1, 2, & 3	BH-1, BH-2, & BH-3
Laminated Veneer Lumber (LVL) Presses 1-11	Presses	None	NA
I-Line Process	I-Line	None	NA

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
I-Line Oven	I-Oven	None	NA
Aggregate Insignificant – includes: Carpentry Shop (PM/PM_{10}) Fire Suppression Abort (PM/PM_{10}) Misc. Hand Tool Use (PM/PM_{10}) Press Lube Emissions (PM/PM_{10}) Product Sealant (VOC) Ink (VOC) Sawdust Dumpsters (PM/PM_{10}) Billet Reclaim Saw (PM/PM_{10})	AI	None	NA

6. Wood Residual Handling System (WRH): The wood residual handling system consists of several material handling cyclones, each of which vents to one of three (3) baghouses, BH1, BH2, and BH3. BH1 was manufactured by Western Pneumatics with 9:1 design air to cloth ratio, 630 bags, and was installed in 1990. BH2 was manufactured by Carothers with 10:1 design air to cloth ratio, 460 bags, and was installed in 1979. BH3 was manufactured by Carter Day with 10:1 design air to cloth ratio, 36 bags, and was installed in 1989. The wood residuals are blown to overhead truck bins which emit fugitive particulate when material is transferred to wood residual trucks.

7. Presses 1-11 (Presses): The following are details of the existing presses: Press 1 was installed in 2004. Presses 2 and 3 were installed in 2000. Presses 4, 5 and 8 were installed in 2001. Press 7 and 9 were installed in 1999. Presses 6, 10 and 11 have been authorized for construction but not yet installed.

8. I-Line: Adhesive is applied to web and flange material to manufacture structural Ijoists. The process was installed in 1972 and has a maximum rated design capacity of 328,000 lb of adhesive used per month.

9. I-Line Oven (Oven): Natural gas burners heat the I-Line oven chamber to cure the adhesive. The original oven was installed in 1973 but later replaced in 1981 by a new oven. The newer oven has two Maxon natural gas fired burners with a rated design capacity of 3.5 MMbtu/hr.

10. Aggregate Insignificant (EU-AI): Aggregate Insignificant include emissions described below:

Carpentry Shop (PM/PM_{10})
Fire Suppression Abort (PM/PM_{10})
Misc. Hand Tool Use (PM/PM_{10})
Press Lube Emissions (PM/PM_{10})
Product Sealant (VOC)
Ink (VOC)
Sawdust Dumpsters (PM/PM_{10})
Billet Reclaim Saw (PM/PM_{10})

11. Categorically Insignificant Activities: The facility has the following categorically insignificant activities:

- Constituents of a chemical mixture present at less than 1% by weight of any chemical orcompound regulated under divisions 200 through 268 excluding divisions 248 and 262 of this chapter, or less than 0.1% by weight of any carcinogen listed in the U.S. Department of Health and Human Services*Annual Report on Carcinogens* when usage of the chemical mixture is less than 1000,000 pounds/year.
- Evaporative and tail pipe emissions from on-site motor vehicle operation
- Distillate oil, kerosene, and gasoline fuel burning equipment rated at less than or equal to 0.4 million Btu/hr
- Natural gas and propane burning equipment rated at less than or equal to 2.0 million Btu/hr
- Office activities
- Food Service Activities
- Janitorial activities
- Personal care activities
- Groundskeeping activities including, but not limited to building painting and road and parking lot maintenance
- Instrument calibration
- Maintenance and repair shop
- Automotive repair shops or storage garages
- Air cooling or ventilating equipment not designed to remove air contaminants generated by or released from associated equipment
- Refrigeration systems with less than 50 pounds of charge of ozone depleting substances regulated under Title VI, including pressure tanks used in refrigeration systems but excluding any combustion equipment associated with such systems.
- Bench scale laboratory equipment and laboratory equipment used exclusively for chemical and physical analysis, including associated vacuum producing devices but excluding research and development facilities.
- Temporary construction activities
- Warehouse activities
- Accidental fires
- Air Vents from air compressors
- Air purification systems
- Electrical charging station
- Fire Brigade Training
- Instrument air dryers and distribution
- Blueprint making
- Routine maintenance, repair, and replacement such as anticipated activities most often associated with and performed during regularly scheduled equipment outages to maintain a plant and its equipment in good operating condition, including but not limited to steam cleaning, abrasive use, and woodworking
- Electric motors
- Storage tanks, reservoirs, transfer and lubricating equipment used for ASTM grade distillate or residual fuels, lubricants, and hydraulic fluids
- On-site storage tanks not subject to any New Source Performance Standards (NSPS), including underground storage tanks (UST), storing gasoline or diesel used exclusively for fueling of the facility's fleet of vehicles
- Natural gas, propane, and liquefied petroleum gas (LPG) storage tanks and transfer equipment
- Pressurized tanks containing gaseous compounds
- Vacuum sheet stacker vents
- Storm water settling basins
- Fire suppression and training
- Paved roads and paved parking lots within an urban growth boundary
- Hazardous air pollutant emissions of fugitive dust from paved and unpaved roads, except for those sources that have processes or activities that contribute to the deposition and entrainment of hazardous air pollutants from surface soils

- Health, safety, and emergency response activities
- Emergency generators and pumps used only during loss of primary equipment or utility service
- Oil/water separators in effluent treatment systems
- Combustion source flame safety purging on startup

Aggregate Insignificant Activities

12. Aggregate insignificant emissions from activities identified by the permittee are detailed in the following table:

Emissions Source	Pollutants (lbs/yr)		
	PM	PM_{10}	VOC
Carpentry Shop	50	50	NA
Ink	NA	NA	1000
Product Sealant	NA	NA	50
Press Lube	450	450	NA
Miscellaneous Hand Tool Use	50	50	NA
Fire Suppression Abort System	365	183	NA
Sawdust Dumpsters	25	25	NA
Billet Reclaim Saw	50	50	NA
Totals	**990**	**808**	**1050**

EMISSION LIMITS AND STANDARDS

PLANT SITE EMISSION LIMIT (PSEL) INFORMATION

13. Baseline Emission Rate (BER) Information:

Baseline emission rates are based upon actual estimated emission totals for the 1977 calendar year. Emissions are accounted from WRH, two (2) veneer dryers, one (1) oven, truck loading fugitives, three (3) presses, an I-line process, and aggregate insignificant activities. The detail sheets attached to this report contain the rates, factors and more details about the calculations.

CURRENT PLANT SITE EMISSION LIMITS

14. The plant can be operated as much as 24 hours per day, 7 days per week, and 52 weeks per year.

15. The production rates used as a basis for determining the PSELs are as follows:

Production or Process Parameter	Period	Rate	Units
Microllam LVL production	Annual	9,855,000	cu ft
	Max hourly	2,088	cu ft

Plant Site Emission Limits (PSELs)

16. Components of the PSEL

Pollutant	Netting Baseline (tons/yr)	Components of the PSEL			
		Assigned PSEL (tons/yr)	Pollutant	Unassigned Emissions (tons/yr)	ERCs[1] (tons/yr)
PM	22.8	4.0	PM	0	19.4
PM_{10}	21.6	2.6	PM_{10}	0	19.4
CO	1.2	3.1	CO	0	0
NO_x	5.7	7.8	NO_x	0	15.6
SO_2	<0.5	<0.5	SO_2	0	0
VOC	52.6	55.1	VOC	0	0

1. ERCs are the Emission Reduction Credits approved by letter dated April 2, 2007.

For the assigned PSEL, the total annual tons per year are required to be determined as a rolling 12-month total.

The attachment to this report contains calculations of the PSELs.

SIGNIFICANT EMISSION RATE

17. The Plant Site Emission Limit increase over the baseline emissions is less than the Significant Emission Rate (SER) as defined in LRAPA Title 38 rules for all of the pollutants as shown below.

Pollutant	Baseline Emissions (tons/year)	Proposed PSEL (tons/year)	Increase from Baseline (tons/year)	SER (tons/year)
PM	22.8	4.0	-18.8	25
PM_{10}	21.6	2.6	-19.0	15
CO	1.2	3.1	1.9	100
NO_x	5.7	7.8	2.1	40
VOC	52.6	55.1	2.5	40
SO_x	<0.5	<0.5	0	40

The table above shows that the facility does not have emissions of any pollutant greater than the SER.

HAZARDOUS AIR POLLUTANTS (HAPs)

18. The facility is a major source of Hazardous Air Pollutants (HAPs) because the potential emissions of methanol are greater than 10 tons per year and the total combined HAP emissions are greater than 25 tons per year. The facility is subject to the Plywood and Composite Wood Products MACT (40 CFR 63, Subpart DDDD). The only requirements imposed by that standard are that commencing October 1, 2007, the permittee shall use exclusively non-HAP coatings for Group 1 Miscellaneous Coating Operations. The natural gas fired press heaters were subject to the Commercial and Industrial Boiler NESHAP, 40 CFR Part 63; Subpart DDDDD under the Small Gaseous Fuel Subcategory as an existing source. However, the US Court of Appeals vacated the Boiler MACT in its entirety on June 8, 2007 and the compliance dates and Boiler MACT applicable requirements are no longer in force. The facility has the potential to emit the following HAPs (tons per year):

Pollutant	Potential to Emit (tons/yr)
Acetaldehyde	1.1E-05
Beryllium Compounds	9.4E-07
Cadmium Compounds	8.6E-05
Chromium, total	1.1E-04
Cobalt Compounds	6.6E-06
Dichlorobenzene	3.5E-05
Ethyl Acrylate	1.9E-06
Ethyl Benzene	2.8E-02
Formaldehyde	4.4
Hexane	0.14

Pollutant	Potential to Emit (tons/yr)
Lead Compounds	3.9E-05
Manganese Compounds	3.0E-05
Methanol	38.3
Mercury Compounds	2.0E-05
Naphthalene	4.8E-05
Nickel Compounds	1.6E-04
Phenol	1.5
Polycyclic Organic Matter	4.5E-06
Toluene	0.06
Vinyl Acetate	1.1E-05
Xylene	0.07
Total (tons per year)	44.6

STRATOSPHERIC OZONE DEPLETING REQUIREMENTS

19. The facility does not manufacture, sell, distribute, or use in the manufacturing of a product any stratospheric ozone-depleting substances and the EPA 1990 Clean Air Act, as amended. Sections 601-618 of the act do not apply to the facility except that air conditioning units and fire extinguishers containing Class I or Class II substances must be serviced by certified repairmen to ensure that the substances are recycled or destroyed appropriately.

MONITORING REQUIREMENTS

20. Section 70.6(a)(3) of the federal Title V permit rules, requires all monitoring and analysis procedures or test methods required under applicable requirements be contained in Title V permits. In addition, wherethe applicable requirement does not require periodic testing or monitoring, periodic monitoring must be prescribed that is sufficient to yield reliable data from the relevant time period that is representative of the source's compliance with the permit.

However, the requirements to include in a permit testing, monitoring, recordkeeping, reporting, and compliance certification sufficient to assure compliance does not require the permit to impose the same level of rigor with respect to all emissions units and applicable requirement situations. It does not require extensive testing or monitoring to assure compliance with the applicable requirements for emissions units that do not have significant potential to violate emission limitations or other requirements under normal operating conditions. Where compliance with the underlying applicable requirement for an insignificant emission unit is not threatened by a lack of a regular program of monitoring and where periodic testing or monitoring is not otherwise required by the applicable requirement, then in this instance, the status quo (i.e., no monitoring) will meet section 70.6(a)(3). For this reason, this permit does not include any monitoring for insignificant emissions units and activities.

The Title V permit does include monitoring for all requirements that apply to significant emissions units in addition to the testing requirements in the permit. Periodic visible emissions observations are required for all particulate emissions sources. In addition, the permit includes monitoring of operating parameters for other emission units and pollution control devices. It is assumed that as long as these processes and controls are properly operated, the particulate emissions levels will be below the emissions limits specified in the permit.

The facility is required to record material production and throughput totals and to estimate actual emissions. The estimations are to be based upon production data, emission factors and estimation methods used in the facility's application or other LRAPA approved method.

GENERAL TESTING REQUIREMENTS

21. This section is provided so that the permittee and LRAPA will know what test methods should be used to measure pollutant emissions in the event that testing is conducted for any reason. This section does not by itself require the permittee to conduct any more testing than was previously included in the permit. Although the permit may not require testing because other routine monitoring is used to determine compliance, LRAPA and EPA always have the authority to require testing if deemed necessary to determine compliance with an emission limit or standard. In addition, the permittee may elect to voluntary conduct testing to confirm the compliance status. In either case, the methods to be used for testing in the event that testing is conducted are included in the permit. This is true for SIP as well as NSPS emission limits and standards.

SOURCE TEST RESULTS

22. This facility has conducted various source tests to comply with permit requirements. The table below shows the results of the test reports on file at LRAPA.

Emission Device	Test Date	Production Rate During The Test	Results
Baghouse #1	December 2, 1999	Actual Flow Rate = 53,900 acf/min	PM Concentration = 0.0007 gr/dscf Opacity = 0%
Baghouse #1	May 5, 1998	Actual Flow Rate= 71,000 acf/min	PM Concentration = 0.00041 gr/scfd Opacity = 0%

RECORDKEEPING REQUIREMENTS

23. The permit includes requirements for maintaining records of all testing, monitoring, and production information necessary for assuring compliance with the standards and calculating plant site emissions.

REPORTING REQUIREMENTS

24. The permit includes a requirement for submitting semi-annual and annual monitoring reports that include semi-annual compliance certifications. Excess emissions are required to be reported to LRAPA immediately as well as in a logbook attached to the annual report. Emissions fees reports are required annually.

GENERAL BACKGROUND INFORMATION

25. The proposed permit is a renewal of an existing Oregon Title V Operating Permit (No. 208256) which was issued originally issued on June 14, 1999. The permit was originally scheduled to expire on June 14, 2004.

26. The facility is located in an area that has been designated as non-attainment for PM_{10} and designated as attainment for ozone, carbon monoxide, nitrogen dioxide, sulfur dioxide, and lead.

27. The facility is located within 100 kilometers of four (4) Class I air quality protection areas.

COMPLIANCE HISTORY

28. Pursuant to the requirements of condition 14 of existing Title V Permit No. 208256 and LRAPA 33-060-3A(2), the facility began performing weekly visible emissions tests using EPA Method 9 in July 1997. Based on the results of these tests, it was determined that the facility was notin compliance with the visible emission standard on several occasions after July 1997. LRAPA issued a Notice of Noncompliance (NON) in October 1997 which required the facility to come into continuous compliance with the standard. On December 18, 1997, LRAPA issued Stipulated Final Order (SFO) No. 97-1427 with the goal of establishing conditions and a schedule to require the facility to operate in compliance with the standard.

29. Condition 16.b of the SFO stated the following: "If TJM determines for one or more of the dryers that process and maintenance procedures are insufficient to ensure compliance . . . TJM shall issue purchase orders for control equipment appropriate to ensure compliance . . . . A description of the controls selected and a construction schedule shall be submitted . . . . In no event shall the final completion date be later than May 15, 1999."

30. Pursuant to condition 16.b of the SFO, the facility determined that add-on controls were necessary to ensure compliance with the opacity standard. The facility selected a 37,000 scfm regenerative thermal oxidizer (RTO) as the preferred control method and submitted a Notice of Approval to Construct application to LRAPA on July 15, 1998. To allow the facility to begin building the control deviceas soon as possible, LRAPA issued a conditional Notice of Approval to Construct the device on September 14, 1998. The Notice only authorized construction of the RTO, and prohibited any physical connection to a fuel supply or to the dryers themselves. The facility received LRAPA approval for the removal of the veneer dryers and the modified RTO (T=RTO-1) on November 6, 2006 by way of Approval to Construct NC-208256-C06 and a notice of completion was submitted by the facility on January 18, 2008. The completion notice indicated the two (2) dryers and RTO were removed on April 21, 2007. An Administrative Amendment was submitted by the facility to remove the dryers and RTO and the permit renewal reflects the removal of the veneer dryers and RTO.

31. As of the date of permit issuance, there are no open enforcement actions or non-compliances.

PUBLIC NOTICE

32. This permit was on public notice from March 20, 2008 to April 19, 2008. LRAPA received written comments from the public during the comment period. No request for public hearing was requested or received by LRAPA. The proposed permit was then sent to EPA for a 45 day review period on May 27, 2008. LRAPA requested and EPA agreed to an expedited review of 5 days if there were no substantive or adverse comments during the comment period. The public has 105 days (45 day EPA review period plus 60 days) from the date the proposed permit was sent to EPA to appeal the permit with EPA.

EMISSIONS DETAIL SHEETS

33. The emissions detail sheets are attached. **[attach all ED forms except ED601 Categorically Insignificant Activity forms]**

MAX/cmw
06/30/08