



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

1010 Main Street, Springfield, Oregon 97477  
(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:

**Arauco North America, Inc. --  
Eugene MDF**  
50 North Danebo Avenue  
Eugene, Oregon 97402

INFORMATION RELIED UPON:

Application: 61589, 65388  
Received: May 20, 2016, September 17, 2019

PLANT SITE LOCATION:

50 North Danebo Avenue  
Eugene, Oregon 97402

LAND USE COMPATIBILITY STATEMENT:

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

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

  
Merlyn L. Hough, Director

JAN 14 2020

Effective Date

Nature of Business: Medium Density Fiberboard Manufacturing

Primary SIC: 2493 Reconstituted wood products, medium density fiberboard (MDF)

Secondary SIC: 4961 Fuel burning equipment

RESPONSIBLE OFFICIAL:

Title: Plant Manager

FACILITY CONTACT PERSON:

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

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**LIST OF ABBREVIATIONS USED IN THIS PERMIT**

AQMA	Air Quality Management Area	NESHAP	National Emission Standards for Hazardous Air Pollutants
ASTM	American Society of Testing and Materials	NO <sub>x</sub>	Nitrogen oxides
BDT	Bone dry ton	O <sub>2</sub>	Oxygen
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
CO	Carbon monoxide	ODEQ	Oregon Department of Environmental Quality
CO <sub>2</sub>	Carbon dioxide	ORS	Oregon Revised Statutes
CO <sub>2</sub> e	Carbon dioxide equivalent	O&M	Operation and Maintenance
dscf	Dry standard cubic foot of gas volume at 29.92" Hg and 68°F	Pb	Lead
EF	Emission factor	PCD	Pollution control device
EPA	US Environmental Protection Agency	PCWP	Plywood and Composite Wood Products
ESP	Electrostatic precipitator	PM	Particulate matter
EU	Emissions unit	PM <sub>10</sub>	Particulate matter less than 10 microns in size
FCAA	Federal Clean Air Act	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
GHG	Greenhouse gas	PSEL	Plant Site Emission Limit
gr/dscf	Grain per dry standard cubic foot	RCDME	Routine Control Device Maintenance Exemption
HAP	Hazardous Air Pollutant as defined by LRAPA Title 44	RMP	Risk management plans
ID	Identification number	scf	Standard cubic foot
I&M	Inspection and Maintenance	SD	Sanderdust
LRAPA	Lane Regional Air Protection Agency	SERP	Source Emission Reduction Plan
M	1000	SIP	State Implementation Plan
MACT	Maximum Achievable Control Technology	SO <sub>2</sub>	Sulfur dioxide
MB	Material balance	ST	Source test
MBF	1000 board feet	VE	Visible emissions
Mlb	1000 pounds	VHAP	Volatile Hazardous Air Pollutant
MM	Million	VMT	Vehicle mile traveled
MMcf	Million cubic feet	VOC	Volatile organic compound
MSDS	Material safety data sheet		
MSF	1000 square feet		
NA	Not applicable		

## DEFINITIONS

- d1. **Modified EPA Method 9:** As used in this permit “Modified EPA Method 9” is defined as follows: Opacity must be measured in accordance with EPA Method 9 using the data reduction procedures in EPA Method 203B. For all standards, the minimum observation period must be six (6) minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., three (3) minutes in any one (1) hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. See also the definition of “Opacity” in LRAPA Title 12.
- d2. At this facility, production (gross) is defined in units of MSF (3/4” basis) as product of finished (sold) dimension. This definition also applies for emissions calculation.

**PERMITTED ACTIVITIES**

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120 and LRAPA 34-180]
2. All conditions in this permit are federally enforceable, except as specified below:
  - 2.a. Conditions 5, 6, 59.e, G5, and G9 (LRAPA Title 43 - Asbestos Requirements) are enforceable by LRAPA only. [OAR 340-218-0060]

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

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

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

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Natural Gas-fueled Boiler 2	Boiler-2	None	NA
Natural Gas-fueled Boiler 3	Boiler-3	None	NA
Pressurized Refiner/Westec Dryer	Dryer-1	Wet ESP #1 and #2, Baghouse and Biofilter System	WESP #1 and #2 plus P-1/ Baghouse System and P-1 Biofilter
Blender-1	BL-1	Baghouse System	BH BL-1 Baghouse System (BL-1East and BL-1West Combined Duct)
Press-1 (loader, press, and unloader)	Press-1	Baghouse System and Biofilter	P-1/Baghouse System and P-1 Biofilter
<u>Materials Handling Group 1</u> : Baghouses and Cyclone installed after 1970 (BH 1, 4, 6, 7, 8, 11-15, and Cyclone 1)	Mat-1	Baghouses and Cyclone	BH-1, BH-4, BH-6, BH-7, BH-8, BH-11-15, and C1
Materials Handling Group 3: Fugitives	Mat-3	None	NA
Materials Handling Group 4: Truck Dump	Mat-4	Enclosure	NA
Materials Storage Piles	Piles-1	None	NA

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
<u>Insignificant Emission Unit:</u> Misc. Chemical Usage                    VOC Resin Tanks                                    VOC Diesel Tank                                    VOC Gasoline Storage Tank                    VOC WESP Sediment Tanks                    VOC Steam from Refiner and High-Pressure Cyclone through Pre-Steamer Bin                            VOC Unpaved Roads                            PM/PM <sub>10</sub> /PM <sub>2.5</sub>	IEU	None	NA

**EMISSION LIMITS AND STANDARDS**

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

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

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015(2)	4	Fugitive Emissions	Minimize	I&M Recordkeeping	4.h and 4.i
49-010	5	Nuisance	No nuisance	Recordkeeping	5.a
32-055	6	PM Fallout > 250 microns	No fallout	I&M Recordkeeping	6.a
33-0060(3)(a)(F)	7	Concealment & Masking	Prohibited	I&M Recordkeeping	7.a
51-015	8	SERP	Reduce Emissions	Recordkeeping	8.a
35-0160 and OAR 340-218-0050(3)(a)	9	Boiler-2 and Boiler -3 Fuel Usage	Natural gas	Recordkeeping	9.a
40 CFR Part 68	10	Risk Management Plan	Risk Management Plan	NA	10
42-0043	13	All Criteria Pollutants	Must Meet Criteria for PSELS	Recordkeeping	13.a, 13.b, & 13.c

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-007	11	All Criteria Pollutants	Highest and Best	I&M and Recordkeeping	11.a

4. **Applicable Requirement:** The permittee must 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 are not be limited to the following: [LRAPA 48-015]
  - 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 water or other suitable chemicals on unpaved roads, material stockpiles, and other surfaces which can create airborne dusts;
  - 4.c. Full or partial enclosure of materials stockpiles in cases where application of water or other suitable chemicals is 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;
  - 4.f. The covering of moving, open-bodied trucks transporting materials likely to become airborne;
  - 4.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
  - 4.h. **Monitoring:** [OAR 340-218-0050(3)(a)] The permittee must inspect the facility at least once each week to identify and correct any spillage or leakage from materials handling systems including cyclones, baghouses and conveyors and conveyor transfer points. Spillage or leakage from materials handling systems must be cleaned up immediately during daylight hours. If the spillage is identified during darkness, in hazardous conditions, or in a poorly lit area, the permittee must remove the materials as soon as reasonably possible but no later than 24 hours following identification.
  - 4.i. **Recordkeeping:** The permittee must maintain a record of the facility inspections including date, time, and determinations made. The record must be maintained onsite for a period of at least five (5) years, and must be provided to LRAPA personnel on request.
  
5. **Applicable Requirement:** The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. [LRAPA 49-010] This condition is only enforceable by LRAPA.
  - 5.a. **Monitoring, Testing, Recordkeeping:** [OAR 340-218-0050(3)(a)] The permittee must 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 must also record permittee's actions to investigate, make a determination as to the validity of the complaint, and resolve the problem within two (2) working days of receiving the complaint or within such longer time (not to exceed five (5) working days) as is reasonably necessary. If more than five (5) days are needed to resolve the problem, the permittee must notify LRAPA immediately upon making that determination.
  
6. **Applicable Requirement:** The permittee must not emit particulate matter which is greater than 250



microns in size at such duration or quantity as to create an observable deposition upon the real property of another person. [LRAPA 32-055] This condition is only enforceable by LRAPA.

- 6.a. **Monitoring, Testing:** [LRAPA 35-0160 and OAR 340-218-0050(3)(a)] The permittee must monitor compliance with this applicable requirement using the facility inspections required in Condition 4.h.
7. **Applicable Requirement:** The permittee must not willfully cause or permit the installation or use of any device or use of any means which, without resulting in a reduction in the total amount of air contaminants emitted, conceals emission of air contaminant which would otherwise violate these rules. [LRAPA 33-030]
  - 7.a. **Monitoring, Testing:** [LRAPA 35-0160 and OAR 340-218-0050(3)(a)] Monitoring of compliance with this applicable requirement must be performed using the compliance certifications required in Conditions 57 and 59.d.
8. **Applicable Requirement:** In the event that an Air Pollution Alert, Warning, or Emergency Episode is declared in the Eugene-Springfield area by LRAPA, the permittee must take the action appropriate to the episode condition as required by LRAPA 51-015. The permittee must take action when the permittee first becomes aware of such declaration whether through news media or direct contact with LRAPA.
  - 8.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 35-0160 and OAR 340-218-0050(3)(a)] The permittee must maintain a record (log) of air pollution episodes and emission reduction actions taken, and must provide the log to LRAPA on request.
9. **Applicable Requirement:** Boiler-2 and Boiler-3 are limited to exclusive use of natural gas fuel.
  - 9.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 35-0160 and OAR 340-218-0050(3)(a)] The records required in Conditions 13.a, 16.a and 19.b must be used to monitor compliance with this applicable requirement.
10. **Applicable Requirement:** Should this facility become subject to the accidental release prevention regulations in 40 CFR Part 68, the permittee 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]
11. **Applicable Requirement:** The permittee must maintain and operate all air contaminant emitting equipment and air pollution control equipment in a condition that minimizes degradation of air quality. [LRAPA 32-007]
  - 11.a. **Monitoring, Testing, Recordkeeping:** [LRAPA 35-0160 and OAR 340-218-0050(3)(a)] The permittee must perform inspections and maintain records of maintenance activities as described in the most recent Air Pollution Control Equipment Inspection and Maintenance (I&M) Plan submitted to LRAPA for approval. The inspection and maintenance plan must be reviewed and updated as necessary but at least once every 12 months as part of the annual report required by Condition 55. Revision of the I&M Plan does not constitute an opening of the Title V permit.

**PLANT SITE EMISSION LIMITS**

12. **Applicable Requirement:** The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0041, 42-0055]

**Table 3. Plant Site Emission Limits**

Emissions Unit ID Number	Pollutant	PSEL	Unassigned Emissions	Units	Monitoring Requirements	
					Method	Permit Condition
Emissions Units Boiler-2, Boiler-3, Dryer-1, Blender-1, Press-1, Mat-1, Mat-3, Mat-4, Piles-1 and AI	PM	35	49	tons/year	EF Recordkeeping	13
	PM <sub>10</sub>	34	38	tons/year	EF Recordkeeping	13
	PM <sub>2.5</sub>	30	32	tons/year	EF Recordkeeping	13
	CO	126	217	tons/year	EF Recordkeeping	13
	NO <sub>x</sub>	139	30	tons/year	EF Recordkeeping	13
	SO <sub>2</sub>	39	0	tons/year	EF Recordkeeping	13
	VOC	80	148	tons/year	EF Recordkeeping	13
	GHG (CO <sub>2</sub> e)	74,000	NA	tons/year	EF Recordkeeping	13

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

**Plant Site Emission Limits Monitoring**

13. The permittee must determine compliance with the plant site emissions limits using the following monitoring and calculation procedures: [LRAPA 35-0160, 42-0080 and OAR 340-218-0050(3)(a)]

- 13.a. The permittee must monitor and maintain records of the following process parameters:

**Table 4. Process Parameter Monitoring**

Process Parameter	Emissions Unit(s)	Pollutant(s)	Measurement Technique	Measurement Frequency
Amount of Natural Gas Fuel Burned (MMcf)	Boiler-2, Boiler 3	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , GHG, and VOC	Recordkeeping	Monthly
Sanderdust Fuel Used (BDT)	Dryer-1	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , GHG, and VOC	Recordkeeping	Monthly
Natural Gas Used (MMcf)	Dryer-1, Blender-1	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , GHG, and VOC	Recordkeeping	Monthly
Furnish Dried (BDT)	Dryer-1, Blender-1	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Recordkeeping	Monthly
MDF Produced (MSF - 3/4" basis, gross)	Facility-wide	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Production Records	Monthly
Wood Residual Through Truck Dump	Mat-4	PM, PM <sub>10</sub> , and PM <sub>2.5</sub>	Recordkeeping	Monthly

13.b. The permittee must determine compliance with the PSEs, except GHGs, by calculating emissions for each emissions unit using the following formula, process parameters measured in Condition 13.a, and the emission factors listed in Condition 13.c:

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

where; E = pollutant emissions in tons/year  
 $\sum$  = symbol representing "summation of"  
 P<sub>eu</sub> = process parameter for each emissions unit identified in Condition 13.a.  
 EF<sub>eu</sub> = emission factor identified for each emissions unit and pollutant in Condition 13.c.  
 K = conversion constant = 1 ton/2000 lbs for annual emissions calculations

13.c. The following emission factors must be used to for calculating emissions:

**Table 5. 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	Method	Frequency
<b>Boiler-2, Boiler-3</b>	PM	Natural gas	2.5	lbs/MMCF	No	NA	NA
	PM <sub>10</sub>	Natural gas	2.5	lbs/MMCF	No	NA	NA
	PM <sub>2.5</sub>	Natural gas	2.5	lbs/MMCF	No	NA	NA
	CO	Natural gas	84	lbs/MMCF	No	NA	NA
	NO <sub>x</sub>	Natural gas	100	lbs/MMCF	No	NA	NA
	SO <sub>2</sub>	Natural gas	2.6	lbs/MMCF	No	NA	NA
	VOC (as propane)	Natural gas	5.5	lbs/MMCF	No	NA	NA
<b>Dryer-1(emission factor verification required for sanderdust only)</b>	PM	Natural gas Sanderdust Furnish	2.5 1.27 0.15	lb/MMCF lb/BDT SD lb/BDT furnish	Yes	ODEQ M7	Once per term
	PM <sub>10</sub>	Natural gas Sanderdust Furnish	2.5 1.27 0.15	lb/MMCF lb/BDT SD lb/BDT furnish	Yes	ODEQ M7	Once per term
	PM <sub>2.5</sub>	Natural gas Sanderdust Furnish	2.5 1.27 0.15	lb/MMCF lb/BDT SD lb/BDT furnish	Yes	ODEQ M7	Once per term
	CO	Natural gas Sanderdust Furnish	301 15 neg.	lb/MMCF lb/BDT SD lb/BDT furnish	Yes	EPA RM 10	Once per term

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	Frequency
	NO <sub>x</sub>	Natural gas Sanderdust Furnish	208 19.43 neg.	lb/MMCF lb/BDT SD lb/BDT furnish	Yes	EPA RM7, 7A-E	Once per term
	SO <sub>2</sub>	Natural gas Sanderdust Furnish	2.6 neg. neg.	lb/MMCF lb/BDT SD lb/BDT furnish	No	NA	NA
	VOC (as propane)	Natural gas Sanderdust* Furnish*	5.5 6.9 0.41	lb/MMCF lb/BDT SD lb/BDT furnish	Yes	*EPA Method 25A for VOC and Method 320, NCASI Method CI/WP-98.01, NCASI Method IM/CAN/WP- 99.02, or NCASI Method ISS/FP- A105.01 for formaldehyde and methanol. *Permittee must verify VOC emission factors for both Sanderdust and Furnish	Once per term
<b>Blender-1</b>	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	Natural Gas	2.5	lb/MMCF	No	NA	NA
	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	Furnish	0.004	lb/BDT furnish	No	NA	NA
	CO	Natural Gas	84	lb/MMCF	No	NA	NA
	NO <sub>x</sub>	Natural Gas	100	lb/MMCF	No	NA	NA
	SO <sub>2</sub>	Natural Gas	2.6	lb/MMCF	No	NA	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	Frequency
	VOC (as propane)	Natural Gas Furnish	5.5 0.063	lb/MMCF lb/BDT furnish	No Yes	EPA Method 25A for VOC and Method 320, NCASI Method CI/WP-98.01, NCASI Method IM/CAN/WP-99.02, or NCASI Method ISS/FP-A105.01 for formaldehyde and methanol	Once per term
<b>Mat-1</b> Baghouse Nos. 1, 4, 7, 8, 11, 12, 13, 14, 15 & Cyclone 1	PM/PM <sub>10</sub>	BDT Furnish	0.001	lb/BDT	No	NA	NA
	PM <sub>2.5</sub>	BDT Furnish	0.001	lb/BDT	No	NA	NA
<b>Mat-1</b> Baghouse #6	PM/PM <sub>10</sub>	BDT Sanderdust	0.04	lb/BDT	No	NA	NA
	PM <sub>2.5</sub>	BDT Furnish	0.04	lb/BDT	No	NA	NA
<b>Mat-3</b> Fugitives from Material Storage, Conveying & Transfer	PM	NA	32	lb/month	No	NA	NA
	PM <sub>10</sub>	NA	12	lb/month	No	NA	NA
	PM <sub>2.5</sub>	NA	6	lb/month	No	NA	NA

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	Frequency
<b>Mat-4</b> Truck Dump Area Fugitives	PM/PM <sub>10</sub>	BDT Throughput	0.1	lb/BDT	No	NA	NA
	PM <sub>2.5</sub>	BDT Throughput	0.05	lb/BDT	No	NA	NA
<b>Piles-1</b> Material Storage Piles	PM	NA	10	lb/month	No	NA	NA
	PM <sub>10</sub>	NA	5	lb/month	No	NA	NA
	PM <sub>2.5</sub>	NA	0.73	lb/month	No	NA	NA
	VOC	NA	254	lb/month	No	NA	NA
<b>Press-1</b>	VOC (normal operations)	MSF Production (Gross)	0.0.069	lb/MSF(3/4" basis)	Yes	EPA Method 25A for VOC and Method 320, NCASI Method CI/WP-98.01, NCASI Method IM/CAN/WP- 99.02, or NCASI Method ISS/FP- A105.01 for formaldehyde and methanol	Once per term
	VOC (RCDME)	MSF Production (Gross)	0.69	lb/MSF(3/4" basis)	NA	NA	NA
	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	MSF Production (Gross)	0.08	lb/MSF(3/4" basis)	Yes	ODEQ RM7	Once per term

Emissions Unit(s)	Pollutant	Fuels/Species/ Conditions	Emission Factor	Emission Factor Units	Emission Factor Verification Testing		
					Yes/No	Method	Frequency
	SO <sub>2</sub>	MSF Production (Gross)	Neg.	lb/MSF(3/4" basis	No	NA	NA
	CO	MSF Production (Gross)	0.032	lb/MSF(3/4" basis	Yes	EPA M10	Once per term
	NO <sub>x</sub> (normal operations)	MSF Production (Gross)	0.058	lb/MSF(3/4" basis	Yes	EPA M7, 7A-E	Once per term
	NO <sub>x</sub> (RCDME)	MSF Production (Gross)	0.06	lb/MSF(3/4" basis	No	NA	NA
Aggregate Insignificant – Unpaved Roads	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	Annual Constant (fugitives)	1.0	Tons/year	NA	NA	NA
Aggregate Insignificant – Storage Tanks and Misc. Product Usage, etc.	VOC	Annual Constant (fugitives)	1.0	Tons/year	NA	NA	NA



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

**Table 6. Emissions Unit Boiler-2 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Boiler-2	32-010(2)	14	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	14.a
	32-020(1)(a)	15	PM	0.10 gr/dscf @ 12% CO <sub>2</sub>	VE Periodic Monitoring	15.a
	40 CFR Part 63, Subpart DDDDD (Boiler NESHAP)	17	HAP	Work Practices	Tune-ups	NA

14. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Boiler-2 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-010(2)]
- 14.a. **Monitoring, Testing:** The permittee must monitor visible emissions from emissions unit Boiler-2 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]
15. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, from emissions unit Boiler-2. [LRAPA 32-020(1)(a)]
- 15.a. **Monitoring, Testing:** Monitoring of compliance with Condition 15 pertaining to emissions unit Boiler-2 must be conducted using the visible emission monitoring requirements in Condition 14. [LRAPA 35-0120 and OAR 340-218-0050(3)]
16. **Boiler-2 Recordkeeping:**
- 16.a. A monthly record must be maintained of the quantity of fuel fired in Boiler-2.
- 16.b. Monitoring of compliance with Condition 16 pertaining to emissions unit Boiler-2 must be conducted using the visible emission monitoring requirements in Condition 15, and by limiting fuels fired by the boiler to natural gas exclusively. [LRAPA 35-0120 and OAR 340-218-0050(3)]
17. **Applicable Requirement Boiler NESHAP:** The permittee must comply with the applicable requirements for Boiler-2 and Boiler-3 as specified in 40 CFR Part 63, Subpart DDDDD as promulgated. [40 CFR 63 Subpart DDDDD]:
- 17.a. For each device in EU-Boiler-2 and Boiler-3, the permittee must conduct a tune-up of the boiler annually (or every five (5) years if the boiler has a continuous oxygen trim system that maintains an optimum air to fuel ratio) as specified in Conditions 17.a.i through 17.a.vi to demonstrate continuous compliance. [40 CFR 63.7500(e), 63.7515(d), 63.7540(a)(10), 63.7500(a)(12)]
- 17.a.i. As applicable, inspect the burner, and clean or replace any components of the burner as

- necessary (you may delay the burner inspection any time prior to the tune-up or delay the burner inspection until the next scheduled unit shutdown);
- 17.a.ii. Inspect the flame pattern, as applicable, and adjust the burner as necessary to optimize the flame pattern. The adjustment should be consistent with the manufacturer's specifications, if available;
  - 17.a.iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (you may delay the inspection until the next scheduled unit shutdown);
  - 17.a.iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO<sub>x</sub> requirement to which the unit is subject;
  - 17.a.v. Measure the concentrations in the effluent stream of CO in parts per million, by volume, and oxygen in volume percent, before and after the adjustments are made (measurements may be either on a dry or wet basis, as long as it is the same basis before and after the adjustments are made). Measurements may be taken using a portable CO analyzer; and
  - 17.a.vi. Maintain on-site and submit, if requested by the Administrator, an annual report containing the information as follows:
    - 17.a.vi.1. The concentrations of CO in the effluent stream in parts per million by volume, and oxygen in volume percent, measured at high fire or typical operating load, before and after the tune-up of the boiler;
    - 17.a.vi.2. A description of any corrective actions taken as a part of the tune-up; and
    - 17.a.vi.3. The type and amount of fuel used over the 12 months prior to the tune-up, but only if the unit was physically and legally capable of using more than one type of fuel during that period. Units sharing a fuel meter may estimate the fuel used by each unit.
  - 17.b. The permittee must be in compliance with the work practice standards in 40 CFR Part 63, Subpart DDDDD. These limits apply at all times the affected unit is operating except for the periods noted in § 63.7500(f). [40 CFR 63.7505(a)]
  - 17.c. The permittee may submit only an annual compliance report, as applicable, as specified in paragraphs (b)(1) through (5) of § 63.7550, instead of a semi-annual compliance report. [40 CFR 63.7550(b)]
  - 17.d. The permittee must submit the reports according to the following procedures: [40 CFR 63.7550(h)]
    - 17.d.i. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via the CEDRI. (CEDRI can be accessed through the EPA's CDX.) The permittee must use the appropriate electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD. Instead of using the electronic report in CEDRI for 40 CFR Part 63, Subpart DDDDD, the permittee may submit an alternate electronic file consistent with the XML schema listed on the CEDRI Web site (<http://www.epa.gov/ttn/chief/cedri/index.html>), once the XML schema is available. If the reporting form specific to 40 CFR Part 63, Subpart DDDDD is not available in CEDRI at the time that the report is due, the permittee must submit the report to the Administrator at the appropriate address listed in §63.13. You must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. [40 CFR 63.7550(h)(3)]
  - 17.e. The permittee must keep records as follows: [40 CFR 63.7555(a) and 63.7560]

- 17.e.i. A copy of each notification and report that you submitted to comply with this subpart, including all documentation supporting any Notification of Compliance Status submitted, according to the requirements in § 63.10(b)(2)(xiv). [40 CFR 63.7555(a)(1)]
- 17.e.ii. Records must be in a form suitable and readily available for expeditious review. [40 CFR 63.7560(a)]
- 17.e.iii. The permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report, or record. [40 CFR 63.7560(b)]
- 17.e.iv. The permittee must keep each record on site, or they must be accessible from on site (for example, through a computer network), for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report, or record, according to §63.10(b)(1). The permittee can keep the records off site for the remaining 3 years.

**Table 7. Emissions Unit Boiler-3 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Boiler-3	32-010(2)	18	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	18.a
	32-020(1)(a)	19	PM	0.10 gr/dscf @ 12% CO <sub>2</sub>	VE Periodic Monitoring	19.a
	40 CFR Part 63, Subpart DDDDD (Boiler NESHAP)	20	HAP	Work Practices	Tune-ups	NA
	46-554, 40CFR60 Subpart Dc	19.a	SO <sub>2</sub>	Exclusively Fired on Natural Gas	Fuel Use Record	19.b

- 18. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Boiler-3 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-010(2)]
  - 18.a. **Monitoring, Testing:** The permittee must monitor visible emissions for emission unit Boiler-3 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 19. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot, corrected to 12% CO<sub>2</sub> or 50% excess air, from Boiler-3. [LRAPA 32-020(1)(a)]
  - 19.a. **Monitoring, Testing:** Monitoring of compliance with Condition 19 pertaining to emissions unit Boiler-3 must be conducted using the visible emission monitoring requirements in Condition 18, and by limiting fuels fired by the boiler to natural gas exclusively. [LRAPA 35-0120 and OAR 340-218-0050(3)]
  - 19.b. **Recordkeeping:** A monthly record must be maintained of the quantity of fuel fired in Boiler-3.
- 20. **Applicable Requirement:** The permittee must comply with the applicable requirements for Boiler-3

specified in 40 CFR Part 63 Subpart DDDDD as specified in Condition 17. [40 CFR Part 63 Subpart DDDDD]

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

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dryer-1	32-005	22	PM	Highest and Best	O&M, Recordkeeping	22.a
	32-015(2)(a)	23	PM	0.10 gr/dscf	Parameter Monitoring	23.a
	32-020(2)	21	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	21.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	22.a	PM	Emission Action Level – Highest and Best	O&M, Recordkeeping	22.a
	40 CFR Part 63; Subpart DDDD National Emissions Standards for Hazardous Air Pollutants (NESHAP): Plywood & Composite Wood Products (PCWP)	24	HAP	PCWP MACT	Recordkeeping	24

21. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Dryer-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-020(2)]
- 21.a. **Monitoring, Testing:** The permittee must monitor visible emissions from emission unit Dryer-1 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]
22. **Applicable Requirement:** The permittee must not operate Dryer-1 unless it is exhausted through wet ESPs #1 and #2, and the P-1/Baghouse System and P-1 Biofilter. Dryer-1 must be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment are maintained at full efficiency and effectiveness to keep the emission of air contaminants at the lowest practicable levels. [LRAPA 32-005]
- 22.a. **Monitoring, Testing:** [LRAPA 35-0120 and 340-218-0050(3)]
- 22.a.i. At least quarterly, in accordance with the inspection and maintenance plan in Condition

- 11.a, the permittee must inspect wet ESPs #1 and #2 on the Dryer-1 for physical degradation, including but not limited to missing spray nozzles that could affect the performance of the control device. The permittee must make all necessary repairs to Wet ESPs #1 and #2 to ensure efficient operation. The results of the inspection and any repair activities must be recorded in a log.
- 22.a.ii. For wet ESPs #1 and #2 controlling emissions units Dryer-1, the permittee must monitor and record the Wet ESP exhaust temperature and the secondary voltage. The Wet ESP exhaust temperature monitoring devices and voltage indicating devices must be installed, operated, maintained, and calibrated in accordance with the manufacturer's written instructions.
- 22.a.ii.1. *At least daily*, the permittee must monitor the temperature and voltage trends, and initiate corrective action if the outlet temperature exceeds 180 degrees F, or secondary voltage consistently stays below 37 kV for more than two (2) hours during Dryer 1 operation. [LRAPA 32-007 and 40 CFR Part 64 CAM]
- 22.a.ii.2. The permittee must maintain records of the number and duration of excursions identified in this condition, and corrective actions taken.
- 22.a.iii. A deviation from the approved wet ESP exhaust temperature and secondary voltage ranges will not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
23. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot from emissions unit Dryer-1. [LRAPA 32-015(2)(a)]
- 23.a. **Monitoring, Testing:** ODEQ Method 7 must be used for measuring particulate matter emissions from wet ESPs #1 and #2 controlling emissions from emissions unit Dryer-1. Each test run must be a minimum of 60 minutes long with a minimum sample volume of at least 31.8 dscf. Test results must be reported as grains per dry standard cubic feet (gr/dscf), pounds per hour, and pounds per 1000 ft<sup>2</sup> on a 3/4" and 1/8" basis of hardboard product (finished product equivalent) produced. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 23.a.i. At least one (1) source test must be performed on Dryer-1 Wet ESPs during the permit term.
- 23.a.ii. The permittee must conduct the source test required by Condition 23.a to verify that the dryer particulate emissions are below the emissions limits while operating within the exhaust temperature and secondary voltage range established in accordance with Condition 22.a.ii.
- 23.a.iii. During each test run, the permittee must record the following information:
- 23.a.iii.1. Type and quantity of fuel fired in Dryer-1;
- 23.a.iii.2. Amount of hardboard, finished product equivalent (1000 ft<sup>2</sup>/hr on a 3/4" and 1/8" basis);
- 23.a.iii.3. Visible emissions as measured in accordance with Modified EPA Method 9 within 30 minutes before, during, or within 30 minutes after each ODEQ Method 7 test run, unless weather conditions are such that it is not possible to read opacity; and
- 23.a.iii.4. Wet ESP #1 and #2 exhaust temperatures and secondary voltages.
- 23.a.iv. The source test must be conducted in accordance with Condition 46.

### PCWP MACT Emission Limits, Standards and Requirements

24. **Applicable Requirement:** The permittee must use an emissions control system to ensure the emissions from Dryer-1 meet the compliance options and operating requirements in Table 1B, Row 5 (reduce overall formaldehyde by 90%), Table 2 Row 4 (use of control device other than thermal oxidizer, catalytic oxidizer, or biofilter) and Table 2 Row 3 (biofilter) to 40 CFR 63, subpart DDDD. [40 CFR 63.2240(b)]
- 24.a. **Continuous Compliance Demonstration:** The permittee must demonstrate continuous compliance with the compliance options, operating requirements and work practice requirements by conducting a repeat performance test using the applicable methods specified in Table 4 of 40 CFR 63, Subpart DDDD within 2 years following the previous performance test and implementing the source specific plan to address how organic HAP captured in the ESP wastewater is contained or destroyed to minimize release to the atmosphere in accordance with the site-specific parameters established in Condition 24.c. [LRAPA 35-0120, OAR 340-218-0050-3 and 40 CFR 63.2268]
- 24.a.i. The permittee must report each instance in which the permittee did not meet each compliance option, operating requirement, and work practice requirement in Table 7 of 40 CFR 63, Subpart DDDD that applies. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in Conditions 24.a.i.1 through 24.a.i.3. These instances are deviations from the compliance options, operating requirements, and work practice requirements in the NESHAP. These deviations must be reported according to the requirements in Conditions 51 through 56. [40 CFR 63.2271(b)]
- 24.a.i.1. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the SSM Plan. [40 CFR 63.2271(b)(1)]
- 24.a.i.2. Deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the requirements of 40 CFR 63.6(e)(1). LRAPA will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 CFR 63.6(e). [40 CFR 63.2271(b)(2)]
- 24.a.i.3. Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the approved routine control device maintenance exemption. The routine control device maintenance exemption must not exceed 3 percent of annual operating uptime for each process unit controlled. [40 CFR 63.2271(b)(3)]
- 24.b. **Continuous Compliance Demonstration Reporting:** The permittee must certify compliance with the requirements of Condition 31.a.iii.C as part of each semi-annual compliance certification. [40 CFR 63.2271 and 63.2281]
- 24.b.i. This report must include identification of each instance in which the permittee did not meet each compliance option and operating requirement in Table 7 of 40 CFR Part 63 Subpart DDDD that applies to the facility. This includes periods of startup, shutdown and malfunctions and periods of control device maintenance. [40 CFR 63.2271(b)]
- 24.b.ii. The permittee must report to LRAPA by fax or by telephone within two working days after starting actions inconsistent with the SSM Plan. [40 CFR 63.10(d)(5)(ii)]
- 24.b.iii. The permittee must follow a written follow-up report with LRAPA within 7 days after the

end of any SSM event where actions were taken inconsistent with the SSM Plan unless LRAPA has authorized alternative arrangements. [40 CFR 63.10(d)(5)(ii)]

24.c. **Dryer-1 and Dryer-1 WESP Site-Specific Operating Parameters:** The permittee must maintain the following average operating parameters within the ranges established during the performance test(s) required by Condition 24.a: [Table 2, Row 4, 40 CFR Part 63 Subpart DDDD]

24.c.i. 24-hour combined WESP water blow-down rate: minim = 35,512 gallons/day

24.c.ii. Refiner/Dryer-1 steam diversion valve setting: minimum = 35% open

24.d. **Notice:** The permittee must notify LRAPA and the EPA within 30 days before taking any of the actions specified below: [40 CFR 63.2280(g)]

24.d.i. The permittee modifies or replaces the control system for any process unit subject to the compliance options and operating requirements in 40 CFR Part 63, Subpart DDDD. [40 CFR 63.2280(g)(1)]

24.d.ii. The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device. [40 CFR 63.2280(g)(3)]

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

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Blender-1	32-005	27	PM	Highest and Best	O&M, Recordkeeping	27.a
	32-015(2)(a)	26	PM	0.10 gr/dscf	Parameter Monitoring	26.a
	32-020(2)	25	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	25.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	27.a	PM	Emission Action Level/ Indicator Range	O&M, Recordkeeping	27.a

25. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Blender-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-020(2)]

25.a. **Monitoring, Testing:** The permittee must monitor visible emissions from the baghouse controlling emissions from emission unit Blender-1 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]

26. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot from emissions unit Blender-1. [LRAPA 32-015(2)(a)]
- 26.a. **Monitoring, Testing:** The permittee must monitor visible emissions from the baghouse controlling emissions from emission unit Blender-1 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]
27. **Compliance Assurance Monitoring:**
- 27.a. **At least daily** when operating, the permittee must monitor the baghouse (BH BL-1) pressure drop, and initiate corrective action if the pressure drop exceeds the following range in inches of water: 0.1 to 6.0. [CAM – 40 CFR Part 64 and LRAPA 35-0200]
- 27.b. A deviation from the approved baghouse pressure drop ranges will not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
- 27.c. **Recordkeeping:** The permittee must record in a log the results of inspections and any repair activities performed and maintain records of the number and duration of excursions identified in Conditions 27.a and corrective actions taken.

**Table 10. 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	32-020(2)	28	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	28.a
	32-015(2)(a)	29	PM	0.10 gr/dscf	Stack test and VE Periodic Monitoring	29.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	30	PM	Emission Action Level/Indicator Range	O&M, Recordkeeping	30
	40 CFR Part 63; Subpart DDDD NESHAP: PCWP	31	HAP	90% Reduction in Formaldehyde, Parametric Monitoring	Recordkeeping	31

28. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Press-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-010(2)]
- 28.a. **Monitoring, Testing:** The permittee must monitor visible emissions from emissions unit Press-1 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]



29. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter in excess of 0.10 grain per standard cubic foot from emissions unit Press-1. [LRAPA 32-015(2)(a)]
- 29.a. **Monitoring, Testing:** The permittee must monitor visible emissions from Press-1 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]
30. **Compliance Assurance Monitoring:**
- 30.a. **At least daily** when operating, the permittee must monitor each baghouse (P-1N and P-1S) pressure drop, and initiate corrective action if the pressure drop exceeds the following range in inches of water: [CAM – 40 CFR Part 64]
- 30.a.i. P-1N: 0.1 to 4.0.
- 30.a.ii. P-1S: 0.1 to 4.0.
- 30.b. A deviation from the approved baghouse pressure drop ranges will not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
- 30.c. **Recordkeeping:** The permittee must record in a log the results of inspections and any repair activities performed and maintain records of the number and duration of excursions identified in Condition 30.a, and corrective actions taken.

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

31. **Applicable Requirement:** The permittee must use an emissions control system (P-1 Biofilter herein referred to as “biofilter”) to ensure the resulting emissions from Press-1 and the refiner/dryer (Dryer-1) meet the compliance options and operating requirements in Table 1B Row 5 (reduce overall formaldehyde by 90%) and Table 2 to 40 CFR 63, subpart DDDD. [40 CFR 63.2240(b)]
- 31.a. **Continuous Compliance Demonstration:** The permittee must demonstrate continuous compliance with the compliance options and operating requirements by maintaining the 24-hour block biofilter bed temperature within the range established according to 63.2262(m) and as specified in Condition 31.d. [40 CFR 63.2271]
- 31.a.i. The permittee must determine the 24-hour block biofilter bed temperature after every 24 hours of operation by taking the average of all recorded readings in the previous 24 hours. [40 CFR 63.2270(e)]
- 31.a.ii. Data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, startups, shutdowns, malfunction and during times covered by the routine control device maintenance exemption are not to be included in the averaging calculations. [40 CFR 63.2270(b and c)]
- 31.a.iii. The permittee must conduct a repeat performance test using the applicable methods specified in Table 4 of 40 CFR 63 Subpart DDDD within 2 years following the previous performance test and within 180 days after each replacement of any portion of the biofilter media with a different type of media or each replacement of more than 50 percent (by volume) of the biofilter bed media with the same type of media. Compliance must be determined by calculating percent reduction using the formula in Condition 31.a.iii.C. [Table 7, Row 3 of 40 CFR 63 Subpart DDDD]
- 31.a.iii.A. The permittee must meet the requirements in Table 4 of 40 CFR 63, subpart DDDD in performing any performance test unless an alternative testing procedure is approved in advance. [40 CFR 62.2260(a) and 40 CFR 63.7(f)]
- 31.a.iii.B. The permittee must submit a written notification of intent to conduct a performance test at least 60 calendar days before the performance test is scheduled to begin as specified in 40 CFR 63.7(b)(1). In the event the permittee is unable to conduct the performance test on the date specified in the notification due to unforeseeable circumstances beyond the permittee’s control, the

permittee must notify LRAPA as soon as practicable and without delay prior to the scheduled performance test date and specify the date when the performance test is rescheduled. This notification of delay in conducting the performance test does not relieve the permittee of legal responsibility for compliance with any other applicable provisions of 40 CFR Part 63 or with any other applicable Federal, State, or local requirement, nor will it prevent LRAPA from implementing or enforcing 40 CFR Part 63 or taking any other action under the Act. [40 CFR 63.7(b)(2)]

- 31.a.iii.C. The permittee must determine compliance with Table 1B compliance option 5 (90% reduction in formaldehyde emissions) through the use of the following equation: [40 CFR 63.2262(h)]

$$PR = CE \times ((ER_{in} - ER_{out}) / ER_{in}) \times 100$$

Where:

PR = percent reduction (%)

CE = capture efficiency (%) (assumed to be 100% for Dryer-1 and determined for Press-1 according to 40 CFR 63, subpart DDDD Table 4)

ER<sub>in</sub> = emission rate of formaldehyde in the inlet vent stream of the control device as established by performance test on November 21, 2008 (11.3 lb/hr).

ER<sub>out</sub> = emission rate of formaldehyde in the outlet vent stream of the control device (lb/hr) (calculated by adding the performance test results from testing the outlet of WESP #1, WESP #2 and P-1 Biofilter).

- 31.a.iv. The permittee must maintain a Startup, Shutdown and Malfunction Plan (SSM Plan) compliant with the requirements of 40 CFR 63 Subpart A. [40 CFR 63.6(e)(3)]
- 31.a.v. The permittee must report each instance in which the permittee did not meet each compliance option and operating requirement in Table 7 that applies. This includes periods of startup, shutdown, and malfunction and periods of control device maintenance specified in Conditions 31.a.v.A through 31.a.v.C. These instances are deviations from the compliance options, operating requirements, and work practice requirements in the NESHAP. These deviations must be reported according to the requirements in Conditions 51 through 56. [40 CFR 63.2271(b)]
- 31.a.v.A. During periods of startup, shutdown, and malfunction, the permittee must operate in accordance with the SSM Plan. [40 CFR 63.2271(b)(1)]
- 31.a.v.B. Deviations that occur during a period of startup, shutdown, or malfunction are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the requirements of 40 CFR 63.6(e)(1). LRAPA will determine whether deviations that occur during a period of startup, shutdown, or malfunction are violations, according to the provisions in 40 CFR 63.6(e). [40 CFR 63.2271(b)(2)]
- 31.a.v.C. Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if the permittee demonstrates to LRAPA's satisfaction that the permittee was operating in accordance with the approved routine control device maintenance exemption. The routine control device maintenance exemption must not exceed 3 percent of

annual operating uptime for each process unit controlled. [40 CFR 63.2271(b)(3) and 40 CFR 63.2251(b)(3)]

- 31.b. **Continuous Compliance Demonstration Reporting:** The permittee must certify compliance with the requirements of Condition 31 as part of each semi-annual compliance certification.
- 31.b.i. This report must include identification of each instance in which the permittee did not meet each compliance option and operating requirement in Table 7 of 40 CFR 63 Subpart DDDD that applies to the facility. This includes periods of startup, shutdown and malfunctions and periods of control device maintenance. [40 CFR 63.2271(b)]
- 31.b.ii. The permittee must report to LRAPA by fax or by telephone within two working days after starting actions inconsistent with the SSM Plan. [40 CFR 63.10(d)(5)(ii)]
- 31.b.iii. The permittee must follow a written follow-up report with LRAPA within 7 days after the end of any SSM event where actions were taken inconsistent with the SSM Plan unless LRAPA has authorized alternative arrangements. [40 CFR 63.10(d)(5)(ii)]
- 31.c. **Temperature Monitoring:** For each temperature monitoring device, the permittee must meet the requirements in Conditions 31.c.i through 31.c.vi. [40 CFR 63.2269(b)]
- 31.c.i. Locate the temperature sensor in a position that provides a representative temperature. [40 CFR 63.2269(b)(1)]
- 31.c.ii. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger. [40 CFR 63.2269(b)(2)]
- 31.c.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F. [40 CFR 63.2269(b)(3)]
- 31.c.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor's reading. [40 CFR 63.2269(b)(4)]
- 31.c.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor. [40 CFR 63.2269(b)(5)]
- 31.c.vi. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation, and galvanic corrosion. [40 CFR 63.2269(b)(5)]
- 31.d. **Biofilter Temperature Operating Requirement:** The permittee must maintain the 24-hour block biofilter bed temperature within the following ranges established during the performance test(s) required by Condition 31.a.i: [Table 2, Row 3, 40 CFR Part 63 Subpart DDDD]
- 31.d.i. Press-1 biofilter upper bed temperature limit: maximum = 93 degrees F
- 31.d.ii. Press-1 biofilter lower bed temperature limit: minimum = 65 degrees F
- 31.e. **Notice:** The permittee must notify LRAPA and the EPA within 30 days before taking any of the actions specified below: [40 CFR 63.2280(g)]
- 31.e.i. The permittee modifies or replaces the control system for any process unit subject to the

compliance options and operating requirements in 40 CFR Part 63, Subpart DDDD. [40 CFR 63.2280(g)(1)]

- 31.e.ii. The permittee changes a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device. [40 CFR 63.2280(g)(3)]

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

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-1	32-010(2)	32	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	32.a
	32-015(2)(a)	33	PM	0.10 gr/dscf	I&M Monitoring	33.a
	40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	34	PM	Emission Action Level/Indicator Range	O&M, Recordkeeping	34

- 32. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-1 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-010(2)]
  - 32.a. **Monitoring, Testing:** The permittee must monitor visible emissions from emissions units Mat-1 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 33. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot from air contaminant sources in emission unit Mat-1. [LRAPA 32-015(2)(a)]
  - 33.a. **Monitoring, Testing:** Equipment maintenance and periodic inspection as well as the visible emission surveys required in Condition 32.a must be used to monitor compliance with this applicable requirement. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 34. **Compliance Assurance Monitoring:**
  - 34.a. **At least daily** when operating, the permittee must monitor each baghouse pressure drop in Mat-1, and initiate corrective action if the pressure drop exceeds the following range in inches of water: [CAM – 40 CFR Part 64, LRAPA 35-0300 and OAR 340-218-0050(3)]
    - 34.a.i. BH-1: 0.1 to 3.0
    - 34.a.ii. BH-4: 0.1 to 6.0
    - 34.a.iii. BH-6: 0.1 to 4.0
    - 34.a.iv. BH-7: 0.1 to 3.0
    - 34.a.v. BH-8: 0.1 to 2.5

- 34.a.vi. BH-11: 0.1 to 3.0
- 34.a.vii. BH-12: 0.1 to 5.0
- 34.a.viii. BH-13: 0.1 to 3.0
- 34.a.ix. BH-14: 0.1 to 4.0
- 34.a.x. BH-15: 0.1 to 6.0
  
- 34.b. A deviation from the approved baghouse pressure drop ranges will not by itself be considered a violation of the particulate matter concentration limit or opacity standard in this permit.
- 34.c. **Recordkeeping:** The permittee must maintain records of the maintenance inspections, determinations made, and corrective actions (if required).

**Table 12. 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(2)	35	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	35.a

- 35. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-3 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-010-1 and 3]
- 35.a. **Monitoring, Testing:** The permittee must monitor visible emissions from emissions unit Mat-3 in accordance with Condition 42. [LRAPA 35-0120 and OAR 340-218-0050(3)]

**Table 13. Emissions Unit Mat-4 Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Mat-4	32-010(2)	37	Visible Emissions	20% opacity, 3 min. in 60 min.	VE Periodic Monitoring	37.a
	33-060(5)(a)	36	PM	Enclosed Truck Dump And Storage Areas.	NA	NA

- 36. **Applicable Requirement:** Emissions of particulate matter from the medium density fiberboard (MDF) operation are subject to the requirements of LRAPA 33-060(5)(a). The permittee must comply with the following:
  - 36.a. All truck dumping and storage areas holding or intending to hold raw materials must be enclosed to prevent windblown particulate emissions from these areas to be deposited upon property not

under the ownership of the permittee. [LRAPA 33-060(5)(a)]

- 36.b. If the permittee proposes to control windblown particulate emissions from truck dumping and storage areas other than by enclosure, the permittee must apply to LRAPA for authorization to utilize alternative controls. The application must be submitted pursuant to LRAPA 34-035 and must describe in detail the plan proposed to control windblown particulate emissions and indicate on a plot plan the nearest location of property not under ownership of the permittee. [LRAPA 33-060(5)(c)]
37. **Applicable Requirement:** The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Mat-4 for a period or periods aggregating more than three (3) minutes in any one (1) hour which is equal to or greater than 20% opacity. [LRAPA 32-010(2)]
- 37.a. **Monitoring, Testing:** The control plan required in Condition 36.b and the visible emissions surveys required in Condition 4.h must be used to determine compliance with this applicable requirement. [LRAPA 35-0120 and OAR 340-218-0050(3)]

**Table 14. Hardboard Manufacturing Operations Specific Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
					Method	Condition Number
Dryer-1, Blender-1, Press-1, Mat-1, Mat-3, and Piles-1	33-060(5)(d)	38	PM	82.2 lb/hr [1.0 pound PM/ 1000 ft <sup>2</sup> (1/8” basis) production]	Recordkeeping	38.a

38. **Applicable Requirement:** The permittee must not cause or allow the emission of particulate matter from facility activities/processes other than Boiler-2, Boiler-3, Mat-4, and AI in excess of 82.2 lb/hr. [LRAPA 33-060(5)(d)]
- 38.a. **Monitoring, Testing:** The permittee must monitor compliance with this requirement by performing inspections and maintaining records of maintenance activities as described in the most recent Air Pollution Control Equipment Inspection and Maintenance (I&M) Plan required by Condition 11.a. [LRAPA 35-0120 and OAR 340-218-0050(3)]
- 38.b. **Recordkeeping:** The permittee must maintain records in accordance with Condition 11.a. and perform the emission estimations required by Condition 38.c.
- 38.c. The permittee must calculate the average hourly combined PM emission from Emission Units Dryer-1, Blender-1, Press-1, Mat-1, Mat-3, and Piles-1 for each day by the end of the next business day, by dividing the total daily emissions from these EUs by the number of hours Press-1 was operated that day. The results of those calculations will then be compared to the standard in Condition 38. [LRAPA 33-060(5)(f)]
- 38.c.i. As an alternative to daily calculations, the permittee may establish maximum production rates that, if not exceeded, would ensure that the emissions limitations are not being exceeded. If the permittee uses this option, the daily inspection log must include a record of the average hourly production rates for each day of operation. In

addition, the permittee must be capable of calculating emissions in accordance with this condition at any time upon request from LRAPA.

39. **Applicable Requirement:** LRAPA acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in LRAPA Title 12 exist at facilities required to obtain a LRAPA Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 39.a. LRAPA 32-010(2), and 32-010(3) (20% opacity);
  - 39.b. LRAPA 32-030 (0.10 gr/dscf corrected to 50% excess air for fuel-burning equipment);
  - 39.c. LRAPA 32-015 (0.10 gr/dscf for non-fugitive, non-fuel burning equipment)
  - 39.d. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following: [40 CFR 63.11116(a), (b), (d) federally enforceable, and LRAPA 44-0230, LRAPA only enforceable]
    - 39.d.i. Minimize gasoline spills;
    - 39.d.ii. Clean up spills as expeditiously as practicable;
    - 39.d.iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
    - 39.d.iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
    - 39.d.v. The permittee is not required to submit the notifications or reports as specified in 40 CFR 63.11124 and 63.11126, or subpart A, but the permittee must have records available within 24 hours of a request by LRAPA to document gasoline throughput.
    - 39.d.vi. Portable gasoline containers that meet the requirements of 40 CFR Part 59, subpart F, are considered acceptable for compliance with Condition 39.d.iii.
  - 39.e. In addition to the measures specified in Condition 39.d the permittee must take the following measures to minimize vapor releases: [LRAPA 44-0230, LRAPA only enforceable]
    - 39.e.i. Do not top off or overfill vehicle tanks. If a person can confirm that a vehicle tank is not full after the nozzle clicks off (such as by checking the vehicle's fuel tank gauge), the person may continue to dispense fuel using best judgment and caution to prevent a spill;
    - 39.e.ii. Post a sign at the gasoline dispensing facility (GDF) instructing a person filling up a motor vehicle to not top off the vehicle tank;
    - 39.e.iii. Ensure that cargo tanks unloading at the GDF comply with Conditions 39.d.i through 39.d.iii, 39.e.i, and 39.e.ii.
    - 39.e.iv. The permittee must only load gasoline into storage tanks at the facility by utilizing submerged filling, as defined in LRAPA 44-180. The submerged fill pipe must be no more than 12 inches from the bottom of the storage tank.
40. **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 LRAPA Title 12 and perform the testing in accordance with ODEQ's *Source Sampling Manual*.

**PCWP MACT Miscellaneous Coating Operation Requirements**

- 41. Applicable Requirement: The permittee must use only “non-HAP coatings” as defined in 40 CFR 63.2292 for all group 1 miscellaneous coating operations. [40 CFR 63 Subpart DDDD Table 3, Row 5]
  - 41.a. Continuous Compliance: The permittee must continue to use non-HAP coatings AND keep records showing that the permittee is using non-HAP coatings. [40 CFR 63 Subpart DDDD Table 8, Row 5]

**GENERAL MONITORING REQUIREMENTS [LRAPA 35-0160 and 340-218-0050(3)(a)]**

- 42. On the schedule contained in Conditions 42.a, the permittee must conduct a six (6) minute visible emission survey of each emission unit with devices with the potential to emit visible air contaminants to the atmosphere using EPA Method 22 for monitoring pertaining to Conditions 14, 18, 21, 25, 28, 32, and 35. 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. For the purpose of this survey, 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.
  - 42.a. The permittee must use the following monitoring schedule for conducting the visible emission surveys:
    - 42.a.i. Weekly for the following:

**Table 15. Weekly Visible Emission Monitoring Points**

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

- 42.a.ii. Initially, weekly for the following:

**Table 16. Weekly Visible Emission Monitoring Points**

Emissions Unit	Monitoring Point
Press-1	Press Biofilter Outlet



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

**Table 17. Monthly Visible Emission Monitoring Points**

Emissions Unit	Monitoring Point
Boiler-2 and Boiler-3	Boiler Stacks
Dryer-1	WESP #1 and #2 Stacks
Blender-1	Baghouse BL-1 Stacks (BL-1 East and BL-1 West)
Mat-1, Mat-3, Mat-4	Baghouse Stacks, Cyclone Stacks, and Materials-Handling Areas

- 42.b. All visible emissions surveys must be conducted during operating conditions that have the potential to create visible emissions (e.g., process is operating under normal, representative conditions).
- 42.c. If the weekly surveys specifically for Press-1 conducted during four (4) consecutive weeks do not result in the need for corrective action, the surveys need only be done once per month.
- 42.d. If the monthly surveys conducted during four (4) consecutive months do not result in the need for corrective action, the surveys need only be done once per quarter.
- 42.e. If visible emissions (for baghouses visible emissions observations are required for particulate only, not gaseous, emissions) are detected at the emission unit boundary for more than 5% (18 seconds) of the survey time, the permittee must take corrective action which includes one of the following (42.e.i or 42.e.ii):
- 42.e.i. For fugitive emissions from emission units the permittee must use water, sweeping, a chemical treatment, or other effective method to minimize the fugitive emissions, unless cold weather would make this activity result in hazardous conditions. Cold weather is defined as weather conditions where ambient temperatures at surface level are expected to be or have been less than 32°F within 12 hours. If water is used to control the fugitive dust emissions, the permittee must take care not to create a water quality problem from surface water run-off.
- 42.e.ii. Modified EPA Method 9 must be used to determine opacity in accordance with ODEQ's *Source Sampling Manual* within 24 hours on the affected monitoring point. Each Modified EPA Method 9 observation period must be for a minimum of six (6) minutes unless any one (1) reading is equal to or greater than 20% opacity, in which case the observation period must be for a minimum of 60 minutes or until a violation of the emissions standards identified in Conditions 14, 18, 21, 25, 28, 32, and 35, or an exceedance of the applicable requirement is documented, whichever is a shorter period. The permittee must record the results of the Modified EPA Method 9 tests.
- 42.e.iii. For emissions units with a baghouse as a control device, the permittee must perform corrective action by checking the condition of the bags and/or perform maintenance on the baghouses.
- 42.f. The permittee must record the corrective action taken or the results of the Modified EPA Method 9 tests.
- 42.g. 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 42.a.ii through 42.a.iii.

- 42.h. If the observer is unable to conduct the survey and/or Modified EPA 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 must 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 must conduct the test on the following day.
- 42.i. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each visible emissions survey or Modified EPA Method 9 test.
- 43. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
- 44. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0050(3)(a)(F)]
- 45. Monitoring requirements must 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 TESTING REQUIREMENTS [OAR 340-218-0050(3)(a)]**

- 46. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with ODEQ's *Source Sampling Manual*.
  - 46.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to LRAPA at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the ODEQ *Source Sampling Manual* and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for LRAPA to grant approval and may require EPA approval in addition to approval by LRAPA.
  - 46.b. Only regular operating staff may adjust the processes or emission control device parameters during a compliance source test and within two (2) hours prior to the tests. Any operating adjustments made during a compliance source test, which are a result of consultation during the tests with source testing personnel, equipment vendors, or consultants, may render the source test invalid.
  - 46.c. Unless otherwise specified by permit condition or LRAPA-approved source test plan, all compliance source tests must be performed as follows
    - 46.c.i. At least 90% of the design capacity for new or modified equipment; or
    - 46.c.ii. At least 90% of the normal maximum operating rate for existing equipment;  
  
For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
  - 46.d. Each source test 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.

- 46.e. Source test reports prepared in accordance with the ODEQ's *Source Sampling Manual* must be submitted to LRAPA within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.
- 47. The permittee must conduct emission factor verification tests in accordance with ODEQ's *Source Sampling Manual* for the emission units/emission factors identified as requiring testing in Condition 13.c at least once during the permit term. [LRAPA 35-0120, 42-0080, and OAR-340-220-170(1)]
  - 47.a. The permittee must notify LRAPA at least 15 days prior to conducting any emission factor verification tests by submitting a source test plan in accordance with ODEQ's *Source Sampling Manual*.
  - 47.b. The permittee must submit a summary of all emission factor verification tests to LRAPA within 60 days of any test, unless otherwise approved by LRAPA. The summary must include the following information:
    - 47.b.i. Emissions unit and monitoring point identification;
    - 47.b.ii. Emission results in pounds per hour and emission factor units;
    - 47.b.iii. Process parameters during the test (e.g., material throughput, steam production, etc.); and
    - 47.b.iv. Control device operating parameters.
  - 47.c. The emissions factors listed in Condition 13.c are not enforceable limits unless otherwise specified in this permit. Any tests conducted solely to confirm the validity of emission factors must not be used to determine compliance with the PSEs in Condition 12 unless otherwise specified in the permit. Compliance with PSEs must only be determined by the calculations contained in Condition 13.b of this permit, using the monitored parameters recorded during the reporting period and the emission factors contained in Condition 13.c.

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

- 48. The permittee must maintain the following general records where applicable for monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
  - 48.a. Date, place as defined in the permit, and time of sampling or measurements;
  - 48.b. Date(s) analyses were performed;
  - 48.c. Company or entity that performed the analyses;
  - 48.d. Analytical techniques or methods used;
  - 48.e. Results of such analyses;
  - 48.f. Operating conditions as existing at the time of sampling or measurement; and
  - 48.g. Records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
- 49. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
- 50. Unless otherwise specified, the permittee must 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. [LRAPA 35-0160 and OAR 340-218-0050(3)(b)(B)]

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

51. Excess Emissions Reporting The permittee must report all excess emissions as follows: [LRAPA 36-001 through 36-030]
- 51.a. Immediately (i.e., as soon as possible but in no case more than one (1) hour after the beginning of the excess emission period) notify LRAPA of an excess emission event by phone, e-mail, or facsimile: and
  - 51.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025(1)]
    - 51.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
    - 51.b.ii. The date and time the owner or operator notified LRAPA of the event;
    - 51.b.iii. The equipment involved;
    - 51.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
    - 51.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
    - 51.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
    - 51.b.vii. The final resolution of the cause of the excess emissions; and
    - 51.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to 36-040.
  - 51.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 must immediately notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is **1-800-452-0311**.
  - 51.d. If startups, shutdowns, or scheduled maintenance may result in excess emissions, the permittee must 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.
  - 51.e. Once LRAPA approves startup/shutdown procedures, the permittee must notify LRAPA of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if it results in excess emissions. When notice is required by this condition, it must be made in accordance with Condition 51.a
  - 51.f. The permittee must continue to maintain a log of all excess emissions in accordance with 36-025(3). However, the permittee is not required to submit the detailed log with the semi-annual and annual monitoring reports. The permittee is only required to submit a brief summary listing the date, time, and the affected emissions units for each excess emission that occurred during the reporting period. [OAR 340-218-0050(3)(c)]
52. Permit Deviation Reporting. The permittee must promptly report deviations from permit requirements that do not cause excess emissions, including those attributable to upset conditions, as defined in the permit, the probable cause of such deviations, and any corrective actions or preventive measures taken. "Prompt" means within fifteen (15) days of the deviation. Deviations that cause excess emissions, as specified in

LRAPA 36-001 through 36-030 must be reported in accordance with LRAPA 36-025. [OAR 340-218-0050(3)(c)(B)]

53. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions), the missing record(s) must 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 must document the reason for the missing record. [LRAPA 34-015, , and OAR 340-218-0050(3)(b)]
54. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
55. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]
56. The regulatory agencies' addresses are as follows, (unless otherwise instructed by LRAPA):

LRAPA  
1010 Main Street  
Springfield, OR 97477

U.S. EPA  
Enforcement and Compliance Assurance Division  
Region 10 (20-C04)  
1200 Sixth Avenue, Suite 155  
Seattle, WA 98101

#### SEMI-ANNUAL AND ANNUAL REPORTS

57. The permittee must submit three (3) copies of the semi-annual monitoring report, using LRAPA-approved forms, covering the period January 1 to June 30 **by August 31**, and covering the period July 1 to December 31 **by March 15**, unless otherwise approved in writing by LRAPA. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. The semi-annual monitoring report must include the semi-annual compliance certification. [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
58. The permittee must submit three (3) copies of the annual monitoring report, covering the period January 1 to December 31, using LRAPA-approved forms, **by March 15**. Two (2) copies of the report must be submitted to LRAPA and one (1) copy to EPA Region 10. [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
59. The annual monitoring report must consist of:
  - 59.a. Annual records of production and process information identified in Table 4; [LRAPA 35-0160 and OAR 340-218-0050(3)]
  - 59.b. Emission Fee Report; [OAR 340 Division 220]
  - 59.c. Excess Emissions Upset Log; [LRAPA 36-025]
  - 59.d. Second Semi-Annual Compliance Certification. [OAR 340-218-0080] and
  - 59.e. The annual report must also include annual greenhouse gas (GHG) emissions in accordance with OAR 340 Division 215. [OAR 340-215-0010(2) and 340-215-0040]
  - 59.f. The I&M Plan update required by Condition 11.a [LRAPA 35-0160]
60. The semi-annual compliance certification must include the following (provided that the identification of applicable information may cross-reference the permit or previous reports, as applicable): [OAR 340-218-

0080(6)(c)]

- 60.a. The identification of each term or condition of the permit that is the basis of the certification;
- 60.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference. When certifying compliance with new applicable requirements that are incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator also must identify any other material information that must be included in the certification to comply with Section 113(c)(2) of the FCAA, which prohibits knowingly making a false certification or omitting material information;
- 60.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, based on the method or means designated in Condition 60.b. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under LRAPA Title 12, occurred; and
- 60.d. Such other facts as LRAPA may require to determine the compliance status of the source.
- 60.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]
- 60.f. Number of CAM excursions and corrective action.
- 60.g. A PCWP MACT compliance report addressing the emission units subject to 40 CFR 63, Subpart DDDD (Dryer-1 and Press-1) and meeting the requirements of 40 CFR 63.2281(c). [40 CFR 63.2281(b)(5)]

**NON-APPLICABLE REQUIREMENTS**

- 61. The following Federal air quality requirements are not applicable to this facility for the reasons stated. [OAR 340-218-0110]

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 63, Subpart JJJJJ	National Emission Standards for Hazardous Air Pollutants: Industrial, Commercial, and Institutional Area Source Boilers	The permittee is not subject to this NESHAP because the facility is a major source.
40 CFR Part 63, Subpart CCCCC	National Emission Standards for Hazardous Air Pollutants: Gasoline Dispensing Facilities (GDFs)	The permittee is not subject to this NESHAP because the facility does not have any GDFs.
40 CFR Part 63, Subpart ZZZZ	National Emission Standards for Hazardous Air Pollutants: Reciprocating Internal Combustion Engines (RICES)	The permittee is not subject to this NESHAP because the facility does not have any RICES.

Max/cmw  
1/10/20

## GENERAL CONDITIONS

### G1. General Provision

Terms not otherwise defined in the permit must 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; November 15, 2018 - State Implementation Plan Volume 4, Appendix A4;
- b. Continuous Monitoring Manual; April 16, 2015 - 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. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the LRAPA Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

### G4. 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 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 must be supplemental to, and must 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.

### G5. 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. [LRAPA 32-050(2)] This condition is enforceable only by LRAPA.

G6. 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]

G7. 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.

G8. Outdoor Burning [LRAPA Title 47]

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

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR 340-248-0240, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee must comply with OAR 340-248-0240, LRAPA 43-015, and 40 CFR Part 61, Subpart M when conducting any renovation or demolition activities at the facility.

G10. Stratospheric Ozone and Climate Protection [40 CFR 82 Subpart F, LRAPA 32-080]

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

G11. Permit Shield [OAR 340-218-0110]

- a. Compliance with the conditions of the permit must 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 must 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.

G12. 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 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 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.

G13. 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 Lane Regional Air Protection Agency, 1010 Main Street, Springfield, Oregon, 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 must be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. 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 LRAPA Title 12.

- 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 G11 must not extend to off-permit changes.

G15. 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 G11 must not extend to Section 502(b)(10) changes.

G16. 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.

G17. 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.

G18. 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.

G19. 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.

G20. Construction/Operation Modification [OAR 340-218-0190]

The permittee must obtain approval from LRAPA prior to construction or modification of any stationary source of air pollution control equipment in accordance with LRAPA 34-010 and 34-034 through 34-038.

G21. New Source Review Modification [LRAPA 38-0010]

The permittee must not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010) from LRAPA and having satisfied the requirements of LRAPA Title 38 (New Source Review).

G22. 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.

G23. Duty to Provide Information [OAR 340-218-0050(6)(e) and LRAPA 34-015]

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.

G24. 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 must affect only those parts of the permit for which cause to reopen exists.

G25. 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.

G26. Permit Renewal and Expiration [OAR 340-218-0040(1)(a)(D) and 340-218-0130]

- a. This permit must expire 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 must remain in effect until final action has been taken on the renewal application to issue or deny the permit.

G27. 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).

G28. Property Rights [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.

G29. Permit Availability [LRAPA 34-015 and 340-218-0120(2)]

The permittee must have available at the facility at all times a copy of the LRAPA 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 Street  
Springfield, OR 97477  
(541) 736-1056

## ATTACHMENT A: Air Pollution Emergencies

Table I

### AIR POLLUTION EPISODE: *ALERT CONDITION*

#### EMISSION REDUCTION PLAN

#### Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For *Alert Conditions* due to excessive levels of carbon monoxide or ozone, persons operating motor vehicles shall be requested to voluntarily curtail or eliminate all unnecessary operations within the designated *Alert Area*, and public transportation systems shall be requested to provide additional services in accordance with a preplanned strategy.

#### Part B: Pollution Episode Conditions for Particulate Matter

For *Alert Conditions* resulting from excessive levels of particulate matter, the following measures shall be taken in the designated area:

1. There shall be no open burning by any person of any material.
2. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12 noon and 4 p.m.
3. Persons responsible for the operation of any source of air contaminants listed below shall take all required actions for the *Alert Level*, in accordance with the preplanned strategy:

Source of Contamination	Control Actions — <i>Alert Level</i>
A. Coal, oil, or wood-fired facilities.	<ol style="list-style-type: none"><li>1) Utilization of electric generating fuels having low ash and sulfur content.</li><li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li><li>3) Diverting electric power generation to facilities outside of <i>Alert Area</i>.</li></ol>
B. Coal, oil, or wood-fired process steam generating facilities.	<ol style="list-style-type: none"><li>1) Utilization of fuel having low ash and sulfur content.</li><li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li></ol>

Source of Contamination	Control Actions — <i>Alert Level</i>
	3) Substantial reduction of steam load demands consistent with continuing plant operations.
C. Manufacturing industries of the following classifications: <ul style="list-style-type: none"> <li>- Primary Metals Industries</li> <li>- Petroleum Refining</li> <li>- Chemical Industries</li> <li>- Mineral Processing Indus.</li> <li>- Grain Industries</li> <li>- Paper and Allied Products</li> <li>- Wood Processing Industry</li> </ul>	1) Reduction of air contaminants from manufacturing operations by curtailing postponing, or deferring production and all operations. 2) Reduction by deferring trade waste disposal operations which emit solid particle gas vapors or malodorous substance. 3) Reduction of heat load demands for processing. 4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.

**Table II**

AIR POLLUTION EPISODE: **WARNING CONDITIONS**

EMISSION REDUCTION PLAN

Part A: Pollution Episode Conditions for Carbon Monoxide or Ozone

For **Warning Conditions**, resulting from excessive levels of carbon monoxide or ozone, the following measures shall be taken:

1. Operation of motor vehicles carrying fewer than three (3) persons shall be prohibited within designated areas during specified hours. Exceptions from this provision are:
  - A. Public transportation and emergency vehicles
  - B. Commercial vehicles
  - C. Through traffic remaining on Interstate or primary highways.
2. At the discretion of the Agency, operations of all private vehicles within designated areas or entry of vehicles into designated areas may be prohibited for specified periods of time.
3. Public transportation operators shall, in accordance with a pre-planned strategy, provide the maximum possible additional service to minimize the public's inconvenience as a result of No. 1 or No. 2. above.
4. For ozone episodes the following additional measures shall be taken:
  - A. No bulk transfer of gasoline without vapor recovery from 2:00 a.m. to 2:00 p.m.
  - B. No service station pumping of gasoline from 2:00 a.m. to 2:00 p.m.
  - C. No operation of paper coating plants from 2:00 a.m. to 2:00 p.m.
  - D. No architectural painting or auto finishing;
  - E. No venting of dry cleaning solvents from 2:00 a.m. to 2:00 p.m. (except perchloroethylene).
5. Where appropriate for carbon monoxide episodes during the heating season, and where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.

Part B: Pollution Episode Conditions for Particulate Matter

For **Warning Conditions** resulting from excessive levels of particulate matter, the following measures shall be taken:

1. There shall be no open burning by any person of any material.
2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.
3. Persons operating fuel-burning equipment which requires boiler lancing or soot blowing shall perform such operations only between the hours of 12 noon and 4 p.m.
4. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces for domestic space heating, except where such devices provide the sole source of heat.
5. Persons responsible for the operation of any source of air contaminants listed below shall take all required



actions for the **Warning Level**, in accordance with a preplanned strategy:

Source of Contamination	Control Actions — <b>Warning Level</b>
<p>A. Coal, oil, or wood-fired electric power generating facilities.</p>	<ol style="list-style-type: none"> <li>1) Maximum utilization of fuels having lowest ash and sulfur content.</li> <li>2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li> <li>3) Diverting electric power generation to facilities outside of <b>Warning Area</b>.</li> <li>4) Prepare to use a plan of action if an <b>Emergency Condition</b> develops.</li> <li>5) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</li> </ol>
<p>B. Coal, oil, or wood-fired process steam generating facilities.</p>	<ol style="list-style-type: none"> <li>1) Maximum utilization of fuels having the lowest ash and sulfur content.</li> <li>2) Utilization of mid-day (12: 00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing.</li> <li>3) Prepare to use a plan of action if an <b>Emergency Condition</b> develops.</li> <li>4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.</li> </ol>
<p>C. Manufacturing industries which require considerable lead time for shut-down including the following classifications:</p> <ul style="list-style-type: none"> <li>- Petroleum Refining</li> <li>- Chemical Industries</li> <li>- Primary Metals Industries</li> <li>- Glass Industries</li> <li>- Paper and Allied Products</li> </ul>	<ol style="list-style-type: none"> <li>1) Reduction of air contaminants from manufacturing operations by, if necessary, assuming reasonable economic hardships by postponing production and allied operations.</li> <li>2) Reduction by deferring trade waste disposal operations which emit solid particles, gases, vapors or malodorous substances.</li> <li>3) Maximum reduction of heat load demands for processing.</li> <li>4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence of boiler lancing or soot blowing.</li> </ol>
<p>D. Manufacturing industries which require relatively short time for shut-down.</p>	<ol style="list-style-type: none"> <li>1) Elimination of air contaminants from manufacturing operations by ceasing, allied operations to the extent possible without causing injury to persons or damage to equipment.</li> </ol>

Source of Contamination	Control Actions — <i>Warning Level</i>
	<ul style="list-style-type: none"><li data-bbox="758 384 1416 478">2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances.</li><li data-bbox="758 499 1416 531">3) Reduction of heat load demands for processing.</li><li data-bbox="758 552 1416 615">4) Utilization of mid-day (12 noon to 4 p.m.) atmospheric turbulence for boiler lancing or soot blowing.</li></ul>

**Table III**

AIR POLLUTION EPISODE: *EMERGENCY CONDITIONS*

EMISSION REDUCTION PLAN

1. There shall be no open burning by any person of any material.
2. The use of incinerators for the disposal of solid or liquid wastes shall be prohibited.
3. All places of employment, commerce, trade, public gatherings, government, industry, business, or manufacture shall immediately cease operation, except the following:
  - A. Police, fire, medical and other emergency services;
  - B. Utility and communication services;
  - C. Governmental functions necessary for civil control and safety;
  - D. Operations necessary to prevent injury to persons or serious damage to equipment or property;
  - E. Food stores, drug stores and operations necessary for their supply;
  - F. Operations necessary for evacuation of persons leaving the area;
  - G. Operations conducted in accordance with an approved preplanned emission reduction plan on file with the Agency.
4. All commercial and manufacturing establishments not included in these rules shall institute such actions as will result in maximum reduction of air contaminants from their operations which emit air contaminants, to the extent possible without causing injury or damage to equipment.
5. The use of motor vehicles is prohibited except for the exempted functions in 3, above.
6. Airports shall be closed to all except emergency air traffic.
7. Where legal authority exists, governmental agencies shall prohibit all use of wood stoves and fireplaces.
8. Any person responsible for the operation of a source of atmospheric contamination listed below shall take all required control actions for this *Emergency Level*.

Source of Contamination	Control Actions — <i>Emergency Level</i>
A. Coal, oil, or wood-fired electric power generating facilities.	1) Maximum utilization of fuels having lowest ash and sulfur content.  2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.  3) Diverting electric power generation to facilities outside of Emergency area.

Source of Contamination	Control Actions — <i>Emergency Level</i>
	4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
B. Coal, oil, or wood-fired steam generating facilities.	1) Reducing heat and steam process demands to absolute necessities consistent with preventing equipment damage. 2) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing and soot blowing. 3) Taking the action called for in the emergency plan. 4) Cease operation of facilities not related to safety or protection of equipment or delivery of priority power.
C. Manufacturing industries of the following classifications:  - Primary Metals Industry - Petroleum Refining Operations - Chemical Industries - Mineral Processing Industries - Paper and Allied Products - Grain Industry - Wood Processing Industry	1) The elimination of air of contaminants from manufacturing operations by ceasing, curtailing, postponing or deferring production and allied operations to the extent possible without causing injury to persons or damage to equipment. 2) Elimination of air contaminants from trade waste disposal processes which emit solid particles, gases, vapors, or malodorous substances. 3) Maximum reduction of heat load demands for processing. 4) Utilization of mid-day (12:00 noon to 4:00 p.m.) atmospheric turbulence for boiler lancing or soot blowing.