



## BASIC AIR CONTAMINANT DISCHARGE PERMIT

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

This permit is being issued in accordance with the provisions of LRAPA's Rules and Regulations and based on the land use compatibility findings included in the permit record.

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**ISSUED TO:**

T-Bev, Inc.  
1770 Prairie Road  
Eugene, OR 97402  
<https://www.t-bev.com/>

**INFORMATION RELIED UPON:**

Application No.: 67194  
Date Received: 05/10/2021

**PLANT SITE LOCATION:**

1770 Prairie Road  
Eugene, OR 97402

**LAND USE COMPATIBILITY  
STATEMENT:**

Approving Authority: City of Eugene  
Approval Date: 05/05/2021

**ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY**

  
Steven A. Dietrich, Director

5-13-21  
Dated

Source(s) Permitted to Discharge Air Contaminants (LRAPA Section 37-0020):

Table 1 Code	Source Description	SIC
Part A, 2.	Boilers and other fuel-burning equipment (with or without #2 diesel oil back-up) of 2.0 or more MMBTU but less than 10 MMBTU/hour heat input.	4961

## 1.0 STATEMENT OF PURPOSE

- 1.1 Permitted Activities** The permittee is allowed to discharge air contaminants from processes and activities related to the air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit.

## 2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Visible emission limits** Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour. "Opacity" means the degree to which emissions, excluding uncombined water, reduce transmission of light and obscure the view of an object in the background.
- 2.2 Particulate Matter Weight Standards** Particulate matter emissions from any air contaminant source must not exceed 0.10 grains per dry standard cubic foot, adjusted to 50 percent excess air for fuel burning equipment that burns fuels other than wood.
- 2.3 Particulate Emission Limitations for Sources Other Than Fuel Burning Equipment** Particulate matter emissions from any air contaminant source must not exceed 0.10 grains per dry standard cubic foot.
- 2.4 Process Weight Emission Limitation** The permittee must not cause, suffer, allow, or permit the emissions of particulate matter in any one hour from any process in excess of the amount shown in LRAPA Section 32-8010, for the process weight rate allocated to such process.
- 2.5 Particulate Matter Fallout** The permittee must not cause or permit the emission of particulate matter larger than 250 microns in size at sufficient duration or quantity as to create an observable deposition upon the real property of another person.
- 2.6 Nuisance and Odors** The permittee must not cause or allow air contaminants from any source subject to regulation by LRAPA to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel.
- 2.7 Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements

enforceable by LRAPA.

### 3.0 RECORDKEEPING AND REPORTING REQUIREMENTS

- 3.1 **Records**            The permittee must maintain records of the information identified in Condition 3.2 for at least five (5) years from the date of the record.
- 3.2 **Reports**            The permittee is required to report to LRAPA by **February 15<sup>th</sup>** of each year the following information:
  - a. The total amount of natural gas combusted at the facility, in therms, during the previous calendar year.
- 3.3 **Permit Renewal**    An application to renew the existing permit is due by no later than 30 days prior to the expiration date of a Basic ACDP.
- 3.4 **Construction or Modification Notices**    The permittee must notify LRAPA before adding new or modifying existing equipment to the extent that process equipment is substantially changed or added to, or emissions are significantly changed or increased.
- 3.5 **Notice of Change of Ownership or Company Name**    The permittee must promptly notify LRAPA of any change of mailing address, company name, or plant ownership. The permit will expire 60 days after a change in the legal entity owning/operating the facility unless application, with appropriate fees, is made to transfer the permit to the new entity.
- 3.6 **Where to Send Reports and Notices**    The reports and notices, with the permit number prominently displayed, must be sent to the LRAPA office identified on the cover page of the permit.

### 4.0 FEES

- 4.1 **Fees**                The Annual Fees specified in LRAPA Section 37-8020, Table 2, Part 2 and Part 3 for a Basic ACDP are due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by LRAPA regulations, will be mailed prior to the above date.

## 5.0 GENERAL CONDITIONS

- 5.1 Masking of Emissions** The permittee must not cause or permit the installation of any device or use any means designed to mask the emissions 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.
- 5.2 Outdoor Burning** The permittee may not conduct any outdoor burning except as allowed by LRAPA Title 47.
- 5.3 Asbestos** All activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction, and maintenance must be performed by persons certified for asbestos abatement projects. Accumulation of asbestos containing material is prohibited. If you have asbestos questions, contact the LRAPA office identified below.
- 5.4 Permit Availability** The permittee must have a copy of the permit available at all times.
- 5.5 LRAPA Inspections** The permittee must allow the LRAPA's representatives access to the plant site and pertinent records at all reasonable times for the purposes of performing inspections, surveys, collecting samples, obtaining data, reviewing and copying air contaminant emissions discharge records and conducting all necessary functions related to this permit in accordance with ORS 468.095.
- 5.6 Legal Disclaimers** The issuance of this 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.
- 5.7 Permit Revocation** This permit is subject to revocation for cause as provided in LRAPA Section 37-0082.
- 5.8 LRAPA Contact** Call the LRAPA office in Springfield at (541) 736-1056.



Lane Regional Air Protection Agency

**BASIC  
 AIR CONTAMINANT DISCHARGE PERMIT  
 REVIEW REPORT**

T-Bev, Inc.  
 1770 Prairie Road  
 Eugene, OR 97402  
 (541) 653-9197  
<https://www.t-bev.com/>

Reports			NSPS	NESHAP	Public Notice
Annual	Semi-annual	Excess Emissions			
Feb 15	NA	NA	NA	NA	I

1. The proposed permit is an initial permit for a facility that began operation in 2015 at 1770 Prairie Road in Eugene, Oregon.
2. The permittee operates herbal and botanical extracts for functional food, beverage and dietary supplement applications. The predominate industrial classifications for this facility are SIC Code: 2833 - Medicinal Chemicals and Botanical Products and NAICS Code: 325411 - Medicinal and Botanical Manufacturing. The boilers at this facility have secondary industrial classifications of SIC Code: 4961 - Steam and Air-Conditioning Supply and NAICS Code: 221330 - Steam and Air-Conditioning Supply.
3. The significant emission units at the facility consist of two natural gas-fired boilers. The first boiler was installed in 2015 and has a name plate heat input capacity of between 1.47 to 2.94 MMBtu per hour. The second boiler was installed in 2021 and has a name plate heat input capacity of between 1.47 to 3.78 MMBtu per hour. The facility has conservatively assumed that both boilers have maximum heat input capacities at the top end of the listed ranges.
4. This facility qualifies for a Basic ACDP under Table 1, Part A:2. because the facility consists of individual fuel burning equipment that has a maximum heat input rating of 2.0 or more MMBtu per hour but less than 10 MMBtu per hour. LRAPA does not believe source category Table 1, Part B:51. (Organic or inorganic chemical manufacturing and distribution with ½ or more tons per year emissions of any one criteria pollutant) is applicable because this facility does not create or manufacture organic chemicals – they extract and concentrate already existing organic chemicals.
5. The facility is not subject to any New Source Performance Standard (NSPS). The facility does not appear to have any processes regulated under a Synthetic Organic Chemical Manufacturer Industry (SOCMI) NSPS.



6. The facility is an area source of federal hazardous air pollutants. The facility is not subject to a major or area source National Emission Standard for Hazardous Air Pollutants (NESHAP), including 40 CFR 63 subpart VVVVVV (6V) - National Emission Standards for Hazardous Air Pollutants for Chemical Manufacturing Area Sources and 40 CFR 63 subpart BBBB (7B) - National Emission Standards for Hazardous Air Pollutants for Area Sources: Chemical Preparations Industry
7. The facility is located in an area that has been designated as attainment/unclassified for PM<sub>2.5</sub>, ozone (VOC), NO<sub>2</sub>, SO<sub>2</sub>, Pb and a maintenance area for CO and PM<sub>10</sub>.
8. LRAPA has determined that sources that qualify for a Basic ACDP will not have significant emissions. In most cases, the emissions will not exceed 5 tons of PM or PM<sub>10</sub> or 10 tons of any other pollutant. Therefore, the Basic ACDP does not include Plant Site Emission Limits and it is not necessary to estimate emissions for each individual source.
9. Pursuant to LRAPA Subsection 37-0056(4), issuance of a new or renewed Basic Air Contaminant Discharge Permit requires public notice in accordance with LRAPA Paragraph 31-0030(3)(a). Therefore, there will be no prior notice or public participation. However, LRAPA will maintain a list of all permit actions processed under Category I and make the list available for public review.

JJW/rcr  
05/11/2021



**T-Bev, Inc. - 208304**  
**Emission Detail Sheets**  
**Boiler Emission Calculations**

**Boiler Specifications**

Total Max Heat Input	6.72	MMBtu/hr
Heat Value	1020	MMBtu/MMCF
Max Hrs Operation	8760	hr/yr

**Criteria Pollutants**

Pollutant	NG Emission Factor	NG Emission Factor Units	Potential Emissions (lbs/hr)	Potential Emissions (TPY)
PM/PM10/PM2.5	2.5	lbs/MMCF	0.02	0.07
Carbon Monoxide	84	lbs/MMCF	0.55	2.42
Nitrogen Oxides	50	lbs/MMCF	0.33	1.44
Sulfur Dioxide	1.7	lbs/MMCF	0.01	0.05
VOCs	5.5	lbs/MMCF	0.04	0.16
GHGs (CO2 equiv.)	117	lbs/MMBtu	787	3,447

**HAP Emissions**

Pollutant	NG Emission Factor (lb/MMCF)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)
<b>Organics</b>			
Acetaldehyde	0.0031	2.0E-05	8.9E-05
Acrolein	0.0027	1.8E-05	7.8E-05
Benzene	0.0058	3.8E-05	1.7E-04
Ethyl Benzene	0.0069	4.5E-05	2.0E-04
Formaldehyde	0.0123	8.1E-05	3.5E-04
Hexane	0.0046	3.0E-05	1.3E-04
Naphthalene	0.0003	2.0E-06	8.7E-06
POM (inc. PAHs)	0.0004	2.6E-06	1.2E-05
Propylene	0.5300	3.5E-03	1.5E-02



Pollutant	NG Emission Factor (lb/MMCF)	Potential Emissions (lbs/hr)	Potential Emissions (TPY)
Toluene	0.0265	1.7E-04	7.6E-04
Xylenes	0.0197	1.3E-04	5.7E-04
<b>Metals</b>			
Arsenic	2.0E-04	1.3E-06	5.8E-06
Beryllium	1.2E-05	7.9E-08	3.5E-07
Cadmium	1.1E-03	7.2E-06	3.2E-05
Chromium	1.4E-03	9.2E-06	4.0E-05
Manganese	3.8E-04	2.5E-06	1.1E-05
Mercury	2.6E-04	1.7E-06	7.5E-06
Nickel	2.1E-03	1.4E-05	6.1E-05
Selenium	2.4E-05	1.6E-07	6.9E-07
Total =	0.62		0.02

**GHG-Related Emission Factors**

Pollutant	Natural Gas (kg/MMBtu)	GWP
Carbon Dioxide (CO <sub>2</sub> )	53.06	1
Methane (CH <sub>4</sub> )	1.0E-03	25
Nitrous Oxide (N <sub>2</sub> O)	1.0E-04	298

**Notes:**

Two boilers rated up to a maximum heat input of 3.78 and 2.94 MMBtu per hour.

Criteria pollutant emission factors, excluding GHGs, are based on DEQ natural gas emission factors

GHG emission factors are based on 40 CFR 98, Tables C-1 and C-2

FHAP emission factors, except for metals from NG combustion, are from Ventura County APCD "AB 2588 Combustion Emission Factors".

FHAP emission factors for metals from NG combustion are from US EPA AP-42 Section 1.4 - Natural Gas Combustion (07/1998)