



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.

ISSUED TO:

Specialty Crates Inc.
41 North Danebo Avenue
Eugene, Oregon, 97402

INFORMATION RELIED UPON:

Application No.: 70544
Date Received: April 08, 2024

PLANT SITE LOCATION:

41 North Danebo Avenue
Eugene, Oregon, 97402

**LAND USE COMPATIBILITY
STATEMENT:**

Approving Authority: City of Eugene
Approval Date: May 20, 2014

ISSUED BY THE LANE REGIONAL AIR PROTECTION AGENCY

Travis Knudsen, Executive Director

5/14/24

Effective Date

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

Table 1 Code	Source Description	SIC
Part A, 9	Millwork more than 5,000 but less than 25,000 board feet per 8 hours of finished product.	2499

1.0 PERMIT ISSUANCE

- 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air contaminant source(s) listed on the first page of this permit until this permit expires, is modified, revoked or rescinded as long as the permittee complies with the conditions of this permit. If there are other emissions activities occurring at the site besides those listed on the cover page of this permit, the permittee may be required to obtain a General, Simple or Standard ACDP, if applicable. The permittee is also allowed to discharge air contaminants from the following: [LRAPA 37-0056(4)(a)]
- a. Any categorically insignificant activities, as defined in LRAPA title 12, at the source; and
 - b. Construction or modification changes that are a Type 1 or Type 2 change under LRAPA 34- 035 in accordance with LRAPA 34-010 and 34-035 through 34-038.

2.0 GENERAL EMISSION STANDARDS AND LIMITS

- 2.1 Production Limits** The permittee is prohibited from increasing production or throughput of wood panels processed to 25,000 board feet per 8 hours of finished product without first applying for and being issued a General, Simple, or Standard Air Contaminant Discharge Permit. [LRAPA 37-0020(2)]
- 2.2 Visible Emissions** The permittee must comply with the following visible emission limits, as applicable:
- a. For all emissions units, the permittee must not allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity. [LRAPA 32-010(3)(a)]
 - b. The visible emission standards in 2.2.a, are based on the average of 24 consecutive observations recorded at 15-second intervals which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured as measured

by EPA Method 9, a continuous opacity monitoring system (COMS), or LRAPA-approved monitoring method. [LRAPA 32-010(2)].

- c. The visible emissions standard in this condition does not apply to fugitive emissions from the source. [LRAPA 32-010(1)]

2.3 Particulate Matter Weight Standards for Combustion Sources

For fuel burning equipment that was installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015, the particulate matter emissions must not exceed 0.10 grains per dry standard cubic foot, corrected to 50 percent excess air provided that all representative compliance source test results prior to April 16, 2015, demonstrate particulate matter emissions not greater than 0.080 grains per dry standard cubic foot. [LRAPA 32-030(1)(a), 32-030(3) and 32-030(3)(b)]

For fuel burning equipment that was installed, constructed, or modified after June 1, 1970, but prior to April 16, 2015, the particulate matter emissions must not exceed 0.14 grains per dry standard cubic foot, corrected to 50 percent excess air, provided that any representative compliance source test results prior to April 16, 2015 demonstrate emissions greater than 0.080 grains per dry standard cubic foot or if there are no representative compliance source test results. [LRAPA 32-030(1)(b), 32-030(3) and 32-030(3)(b)]

For fuel burning equipment that was installed, constructed, or modified after April 16, 2015, the particulate matter emissions must not exceed 0.10 grains per dry standard cubic foot, corrected to 50 percent excess air. [LRAPA 32-030(2), 32-030(3) and 32-030(3)(b)]

2.4 Particulate Matter Fallout

The permittee must not cause or permit the emission of any 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. [LRAPA 32-055]

2.5 Nuisance and Odors

The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by LRAPA personnel. [LRAPA 49-010]

2.6 Other Regulations

In addition to the specific requirements listed in this permit, the permittee must comply with all other applicable legal requirements enforceable by LRAPA.

3.0 RECORDKEEPING REQUIREMENTS

- 3.1 Monitoring Requirements** The permittee must monitor and maintain records of the operation and maintenance of the plant and associated air contaminant control devices as follows: [LRAPA 34-016(1)]
- a. The number of board feet of lumber used per calendar year.
- 3.2 Operation and Maintenance** The permittee must maintain all records associated with continuous monitoring data, including, but not limited to, original data sheets, charts, calculations, calibration data, production records and final reports related to the operation and maintenance of the plant and associated air contaminant control devices. [LRAPA 34-016(1)]
- 3.3 Excess Emissions** The permittee must maintain records of excess emissions as defined in LRAPA title 36 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. Excess emissions are evident when visible emissions are greater than 20% opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour. [LRAPA 36-025]
- 3.4 Complaint log** The permittee must maintain a log of all written complaints and complaints received via telephone, fax, or email that specifically refer to air pollution concerns associated to the permitted facility. The log must include a record of the permittee's actions to investigate the validity of each complaint and a record of actions taken for complaint resolution. [LRAPA 34-016(1)]
- 3.5 Retention of Records** Unless otherwise specified, all records must be maintained on site for a period of at least five (5) years and be made available to LRAPA upon request. [LRAPA 34-016(5)]

4.0 REPORTING REQUIREMENTS

- 4.1 Excess Emissions** The permittee must notify LRAPA by telephone or in person of any excess emissions which are of a nature that could endanger public health. [LRAPA 36-020]
- a. Such notice must be provided as soon as possible, but never more than one (1) hour after becoming aware of the problem. Notice must be made to the LRAPA office identified in Condition 6.2.
 - b. If the excess emissions occur during non-business hours, the permittee must notify LRAPA by calling the

Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.

- c. The permittee must also submit follow-up reports when required by LRAPA.

4.2 Annual Report

The permittee must submit to LRAPA by **February 15** of each year this permit is in effect the following information for the preceding calendar year: [LRAPA 34-016(2)]

- a. The number of board feet of lumber used per calendar year
- b. Records of all planned and unplanned excess emissions events.
- c. Summary of complaints relating to air quality received by the permittee during the year.

4.3 Notice of Change of Ownership or Company Name

The permittee must notify LRAPA in writing using a LRAPA "Permit Application Form" within 60 days after the following: [LRAPA 37-0030(4)]

- a. Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or
- b. Sale or exchange of the activity or facility.

4.4 Construction or Modification Notices

The permittee must notify LRAPA in writing using a LRAPA "Notice of Construction Form," or "Permit Application Form," and obtain approval in accordance with LRAPA 34-010 through 34-038 before:

- a. New Sources: [LRAPA 34-010(1)(a)] – Construction or operation of a new source that emits any regulated air pollutant.
- b. Existing Source – Construction or modification that will cause an increase, on an hourly basis at full production, of any regulated air pollutant emissions; [LRAPA 34-010(1)(b)(A)]
- c. Existing Source – Replacement of a device or activity that emits any regulated air pollutants; or
- d. Existing Source – Construction, modification, or replacement of any air pollution control device.

4.5 Where to Send Reports and Notices

All reports, notices, and applications should be directed to the LRAPA office identified in Condition 6.2.

5.0 ADMINISTRATIVE REQUIREMENTS

- 5.1 Renewal of the Basic Permit** A complete application for renewal of this permit is due within 30 days prior to expiration. [LRAPA 37-0040(2)(b)(A)]
- a. If LRAPA is delinquent in renewing the permit, the existing permit will remain in effect and the permittee must comply with the conditions of the permit until such time that the permit is renewed.
 - b. The permittee may submit an application for either a General, Simple or Standard ACDP at any time, but the permittee must continue to comply with the Basic ACDP until LRAPA takes final action on the General, Simple or Standard ACDP application.
 - c. If a complete application for renewal of the Basic ACDP or General, Simple or Standard ACDP is filed with LRAPA in a timely manner, the permit will not be deemed to expire until final action has been taken on the application.
- 5.2 Where to Send Renewal Application** All reports, notices, and applications should be directed to the LRAPA office identified in Condition 6.2.

6.0 FEES

- 6.1 Annual Fees** The Annual Fees specified in LRAPA title 37, section 37-8020, Table 2, Part 2.b. and 3.a. 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. [LRAPA 37-0056(3)]
- 6.2 Where to Submit Fees** Fees must be submitted to:
Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477
Telephone: (541) 736-1056
www.lrapa.org

7.0 GENERAL CONDITIONS AND DISCLAIMERS

- 7.1 **Other Regulations** In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by LRAPA.
- 7.2 **Conflicting Conditions** In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply.
- 7.3 **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. [LRAPA 32-050]
- 7.4 **LRAPA Access** The permittee must allow 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.
- 7.5 **Permit Availability** The permittee must have a copy of the permit available at the facility at all times.
- 7.6 **Outdoor Burning** The permittee may not conduct any outdoor burning except as allowed by LRAPA title 47.
- 7.7 **Asbestos** The permittee must comply with the asbestos abatement requirements in LRAPA title 43 for all activities involving asbestos-containing materials, including, but not limit to, demolition, renovation, repair, construction, and maintenance.
- 7.8 **Property Rights** 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.
- 7.9 **Termination, Revocation, or Modification** LRAPA may terminate, modify or revoke this permit in accordance with LRAPA title 37, section 37-0082 and section 37-0084.

8.0 ABBREVIATIONS, ACRONYMS, AND DEFINITIONS

ACDP	Air Contaminant Discharge Permit	NSPS	New Source Performance Standard
ASTM	American Society for Testing and Materials	NSR	New Source Review
AQMA	Air Quality Maintenance Area	O ₂	Oxygen
calendar year	The 12-month period beginning January 1st and ending December 31st	OAR	Oregon Administrative Rules
CFR	Code of Federal Regulations	ORS	Oregon Revised Statutes
CO	Carbon monoxide	O&M	Operation and maintenance
DEQ	Oregon Department of Environmental Quality	Pb	Lead
dscf	Dry standard cubic foot	PCD	Pollution control device
EPA	US Environmental Protection Agency	PM	Particulate matter
FCAA	Federal Clean Air Act	PM ₁₀	Particulate matter less than 10 microns in size
gal	Gallon(s)	PM _{2.5}	Particulate matter less than 2.5 microns in size
gr/dscf	Grains per dry standard cubic foot	ppm	Part per million
HAP	Hazardous Air Pollutant as defined by LRAPA title 44	PSD	Prevention of Significant Deterioration
ID	Identification number	PSEL	Plant Site Emission Limit
O&M	Operation and maintenance	PTE	Potential to Emit
lb	Pound(s)	RACT	Reasonably Available Control Technology
LRAPA	Lane Regional Air Protection Agency	scf	Standard cubic foot
MMBtu	Million British thermal units	SER	Significant Emission Rate
NA	Not applicable	SIC	Standard Industrial Code
NESHAP	National Emissions Standards for Hazardous Air Pollutants	SIP	State Implementation Plan
NO _x	Nitrogen oxides	SO ₂	Sulfur dioxide
		Special Control Area	As defined in LRAPA title 29
		VE	Visible emissions
		VOC	Volatile organic compound
		year	A period consisting of any 12-consecutive calendar months



Lane Regional Air Protection Agency

**BASIC
 AIR CONTAMINANT DISCHARGE PERMIT
 REVIEW REPORT**

Specialty Crates Inc.
 41 North Danebo Avenue
 Eugene, Oregon, 97402

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

1. The proposed permit is a renewal permit for an existing facility constructed in 2014 at 41 North Danebo Avenue, Eugene, Oregon.
2. The permittee operates a millwork activity for making crates. The primary industrial classifications for this facility are SIC Code 2499 – Wood Products, Not Elsewhere Classified, and NAICS Code 321920 – Wood Container and Pallet Manufacturing.
3. This facility’s emission sources include a Baker AX single resaw, a Baker Ambi-Trim trim saw, a Baker double notcher, a Safety Speed 7000 panel saw, a Producto 76-S1 resaw, and a SCMI-M2 gang rip saw. A Baker Ambi-Trim BCO-O is the main emission unit. It has a circular 18-inch blade with 60 teeth. Its production rate varies according to feed speed and material length.
4. This facility qualifies for a Basic ACDP because the facility consists of millwork more than 5,000 but less than 25,000 board feet per maximum 8 hours of finished product.
5. The facility is not subject to any New Source Performance Standard (NSPS).
6. The facility is not subject to any area or major source National Emission Standards for Hazardous Air Pollutants (NESHAP)
7. The facility is located inside the Eugene-Springfield Air Quality Management Area. The facility is located in an area that has been designated attainment/unclassified for PM_{2.5}, ozone (VOC), NO₂, SO₂, and Pb and a maintenance area for CO and PM₁₀.
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 PM₁₀ 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(5), 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.

QL/aa
05/08/2024

Specialty Crates Inc
 Permit Number: 207554

Specialty Crates Emission Details

		Sawmill Emissions				
Process	Pollutant	Actual Sawdust Weight Collected(lbs/year)	Projected Maximum Usage (bd ft./year)	BDT (tons/year)	Emission Factor (lbs/BDT)	Projected Annual Emissions (tons)
Millwork	PM	420000	17520000	1936.42	0.50	0.48
	PM10	420000	17520000	1936.42	0.43	0.42
	PM2.5	420000	17520000	1936.42	0.25	0.24

Emission Factors retrieved from General Permit AQGP-010 for Cyclone - Medium Efficiency.

Annual actual usage is 1900000 bd.ft. according to the annual report this facility provided.

The sawmill can process up to 16000 bd.ft. per 8-hour shift. In a year, the projected maximum usage is $16000 * 3 * 365 = 17520000$ bd.ft.

The cyclone of the facility collect sawdust in a container that weigh 35000lbs if full. The facility approximately collect 12 loads per year. Hence, the total yearly weight of sawdust is 420000lbs.

BDT is calculated by getting the projected weight of sawdust using a ratio of the Projected Maximum Usage over the Actual Annual Usage $(17520000/1900000 \text{ bd.ft./year})$ times the actual annual sawdust (420000lbs)