



LANE REGIONAL AIR PROTECTION AGENCY
TITLE V OPERATING PERMIT

1010 Main St.
Springfield, OR 97477
Telephone (541) 736-1056

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

ISSUED TO:

**Weyerhaeuser NR Company –
Eugene EWP**

195 North Bertelsen Road
Eugene, Oregon 97402

PLANT SITE LOCATION:

195 North Bertelsen Road
Eugene, Oregon 97402


INFORMATION RELIED UPON:

Application No.: 69431
Received: February 23, 2023

LAND USE COMPATIBILITY STATEMENT:

Issued by: Lane County
Dated: September 5, 1996

ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY


Susannah Sbragia, Acting Interim Director

September 26, 2023
Date

<u>Nature of Business</u>	<u>SIC</u>	<u>NAICS</u>
Laminated Veneer Lumber Manufacturing	2439	321213

RESPONSIBLE OFFICIALS

Title: Mill Manager
Phone: (541) 607-8310

FACILITY CONTACT PERSON

Title: Environmental Manager
Phone: (541) 607-8312

**ADDENDUM NO. 1
(Significant Permit Modification)**

In accordance with OAR 340-218-0180(1)(c) and 40 CFR 63 subpart DDDDD, Title V Operating Permit No. 208256 is hereby amended to reduce the tune-up frequency of the process heaters in emission unit Press Heaters from biennially to every 5 years due to the installation of a continuous oxygen trim system. Condition 33.b has been updated to include language requiring a process heater tune-up every 5 years and Condition 33.e has been amended for a 5-year compliance reporting schedule (all new language is in **bold**). In accordance with OAR 340-218-0150(1)(b), the permit is also amended to change the name of the facility from “Weyerhaeuser NR Company – Eugene, OR ELP” to “Weyerhaeuser NR Company – Eugene EWP”.

Emission Unit Press Heaters Specific Emission Limits and Standards

33. Applicable Requirement: (Press Heaters – 40 CFR 63 Subpart DDDDD NESHAP Requirements):

- 33.b. For each process heater in emission unit Press Heaters **that has a continuous oxygen trim system that maintains an optimum air to fuel ratio**, the permittee must conduct a tune-up of the process heater **every 5 years** as specified in Conditions 33.b.i through 33.b.vi to demonstrate continuous compliance. Each **5-year** tune-up must be conducted no more than **61** months after the previous tune-up. **If an oxygen trim system is utilized on a unit without emission standards to reduce the tune-up frequency to once every 5 years, the permittee must set the oxygen level no lower than the oxygen concentration measured during the most recent tune-up.** (The initial tune-up requirement was completed July 6, 2015) [40 CFR 63.7500(e), 63.7515(d), **63.7540(a)(12)**]
- 33.b.i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown, **but the permittee must inspect each burner at least once every 72 months**). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment; [40 CFR 63.7540(a)(10)(i) and 40 CFR 63.7540(a)(12)]
- 33.b.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; [40 CFR 63.7540(a)(10)(ii)]
- 33.b.iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown); [40 CFR 63.7540(a)(10)(iii)]
- 33.b.iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject; [40 CFR 63.7540(a)(10)(iv)]
- 33.b.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 [40 CFR 63.7540(a)(10)(v)]
- 33.b.vi. Maintain on-site and submit, if requested by LRAPA, an annual report containing the information as follows: [40 CFR 63.7540(a)(10)(vi)]
- 33.b.vi.A. 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 or process heater; [40 CFR 63.7540(a)(10)(vi)(A)]
- 33.b.vi.B. A description of any corrective actions taken as a part of the tune-up; and [40 CFR 63.7540(a)(10)(vi)(B)]
- 33.b.vi.C. 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. [40 CFR 63.7540(a)(10)(vi)(C)]
- 33.e. The permittee may submit only a **5-year** compliance report, as applicable, as specified in **Conditions 33.e.i and 33.e.ii**, instead of a semi-annual compliance report. [40 CFR 63.7550(b)]

- 33.e.i. Each 5-year compliance report must cover the applicable 5-year period from January 1 to December 31. [40 CFR 63.7550(b)(3)]**
- 33.e.ii. Each 5-year compliance report must be postmarked or submitted no later than March 15. [40 CFR 63.7550(b)(4) and 40 CFR 63.10(a)(5)]**

JW/cmw
8/18/2023



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ISSUED BY LANE REGIONAL AIR PROTECTION AGENCY

A handwritten signature in black ink, appearing to read "Merlyn L. Hough", is written over a horizontal line.

Merlyn L. Hough Director

INFORMATION RELIED UPON:

Renewal Application No.: 64034
Received: May 25, 2018
Administrative Amendment No.: 66260
Received: June 19, 2020

LAND USE COMPATIBILITY STATEMENT:

Issued by: Lane County
Dated: September 5, 1996

January 12, 2021

Date

<u>Nature of Business</u>	<u>SIC</u>	<u>NAICS</u>
Laminated Veneer Lumber Manufacturing	2439	321213

RESPONSIBLE OFFICIALS

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LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit	MSF	1,000 Square feet 3/8” basis
Act	Federal Clean Air Act	MSDS	Material Safety Data Sheets
ASTM	American Society of Testing and Materials	NA	Not applicable
BDT	Bone dry ton	NESHAP	National Emission Standard for Hazardous Air Pollutants
BDU	Bone dry unit	NO _x	Nitrogen oxides
BF	Board feet	NSPS	New Source Performance Standards
Btu	British thermal unit	O ₂	Oxygen
CFR	Code of Federal Regulations	OAR	Oregon Administrative Rules
CO	Carbon Monoxide	ODEQ	Oregon Department of Environmental Quality
CO ₂	Carbon Dioxide	ORS	Oregon Revised Statutes
CO ₂ e	Carbon Dioxide Equivalent	OSHA	Occupational Safety and Health Administration
CPMS	Continuous parameter monitoring system	O&M	Operation and maintenance
Day	A calendar 24-hour period	Pb	Lead
DEQ	Department of Environmental Quality	PCD	Pollution Control Device
dscf	Dry standard cubic feet	PM	Particulate matter
EF	Emission factor	PM ₁₀	Particulate matter less than 10 microns in size
ERC	Emission Reduction Credit	PM _{2.5}	Particulate matter less than 2.5 microns in size
EPA	US Environmental Protection Agency	ppmv	Parts per million by volume
EPI	Epichlorohydrin	ppm	Parts per million
EU	Emissions Unit	PSEL	Plant Site Emission Limit
FCAA	Federal Clean Air Act	psia	Pounds per square inch, actual
FSA	Fuel sampling and analysis	RMP	Risk Management Plan
GHG	Greenhouse Gas	RTO	Regenerative Thermal Oxidizer
gr/dscf	Grain per dry standard cubic foot (1 pound=7000 grains)	SERP	Source emissions reduction plan
HAP	Hazardous Air Pollutant as defined by OAR 244-0040	SO ₂	Sulfur dioxide
HCFC	Halogenated Chloro-Fluoro-Carbon	ST	Source test
HCOH	Formaldehyde	TPY	Tons per year, (short ton=2000 lbs)
ID	Identification number	UF	Urea Formaldehyde
I&M	Inspection and maintenance	UFC	Urea-Formaldehyde Concentrate
LRAPA	Lane Regional Air Protection Agency	VE	Visible emissions
M	1,000	VMT	Vehicle miles traveled
MM	1,000,000	VOC	Volatile organic compounds
Month	Calendar month	Week	Calendar week starting at 12:01 am on Sunday morning
MB	Material Balance	Year	A period consisting of any 12-consecutive calendar months
MBF	1,000 Board feet		

DEFINITIONS

Modified EPA Method 9: As used in this permit “Modified EPA Method 9” is defined as follows:

Opacity must be measured in accordance with EPA 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.

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. [LRAPA 34-180 and OAR 340-218-0010, 340-218-0120(2)]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by LRAPA, EPA and citizens under the Clean Air Act, except as specified below:
 - 2.a. Conditions 7, 8, 9 and G5 and G9 (LRAPA Title 43) are only enforceable by LRAPA. [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(3)]:

Emission Unit and Pollution Control Device Identification

Emission Unit Description	EU ID	Pollution Control Device	PCD ID
Wood Residual Handling System	WRH	Baghouses 1, 2, & 3	BH-1, BH-2, & BH-3
Laminated Veneer Lumber (LVL) Presses 4, 4-18, 4-19, and 4-20	Presses	None	NA
Future Laminated Veneer Lumber (LVL) Press ID #'s TBD	Presses	None	NA
I-Line Process	I-Line	None	NA
I-Line Oven	I-Oven	None	NA
Press Heaters	Press Heaters	None	NA
Future Water Shed Overlay	WSO	None	NA
Aggregate Insignificant – includes: Carpentry Shop (PM/PM ₁₀ /PM _{2.5}) Fire Suppression Abort (PM/PM ₁₀ /PM _{2.5}) Misc. Hand Tool Use (PM/PM ₁₀ /PM _{2.5}) Press Lube Emissions (PM/PM ₁₀ /PM _{2.5}) Sawdust Dumpsters (PM/PM ₁₀ /PM _{2.5}) Billet Reclaim Saw (PM/PM ₁₀ /PM _{2.5}) Misc. Inks (VOC) Misc. Adhesive Usage (VOC) Misc. Aerosol Paint Cans (VOC) Misc. Thinner (VOC) Misc. Enamel Paint (VOC)	AI	None	NA

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

The following tables and conditions contain the applicable requirements along with the testing, monitoring, and recordkeeping requirements for the emissions units to which those requirements apply.

Facility-wide Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
48-015(1)	4	Fugitive emissions	Minimize	Recordkeeping	5, 6
49-010(1) & 39-090(1)	7	Nuisance	No nuisance	Recordkeeping	8
32-055	9	PM fallout	No deposition of PM >250µm on others' property	Recordkeeping	10
32-090(1)	11	Injury or damage to persons or property	Prohibited	Recordkeeping	13
32-050(1) & (2)	12	Concealment and masking	Prohibited	Recordkeeping	13
51-015	14	Source Emission Reduction Plan	Reduce Emissions	Recordkeeping	15
32-065(2)(a)	16.a.i	#1 Distillate oil sulfur content	0.3 percent by weight	Recordkeeping	17
32-065(2)(b)	16.a.ii	#2 Distillate oil sulfur content	0.5 percent by weight	Recordkeeping	17
32-065(1)	16.b	Residual oil sulfur content	1.75 percent by weight	Recordkeeping	17
40 CFR Part 68	18	Risk management	Risk management plan	NA	18
40 CFR Part 63 Subpart DDDD Plywood and Composite Wood Products NESHAP	19	HAPs	As applicable	Recordkeeping	20

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 not be limited to the following: [LRAPA 48-015(1)]

- 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, materials 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; and
 - 4.g. The prompt removal from paved streets of earth or other material which does or may become airborne.
5. **Monitoring Requirement:** At least once each week that the plant is operating, the permittee must visually survey the facility using EPA Method 22 for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are visible emissions that leave the plant site boundary for a period or periods totaling more than 18 seconds in a six-minute period. The minimum observation time must be at least six minutes. The visible emissions survey may be conducted simultaneously on multiple emission sources when they are in the same field of view for the observer. The person conducting the observation must follow EPA Method 22. If sources of excess fugitive emissions are identified, the permittee must: [LRAPA 34-016, LRAPA 48-015(2)&(3) and OAR 340-218-0050(3)(a)]
- 5.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 4; or
 - 5.b. Develop an LRAPA-approved Fugitive Emission Control Plan upon request by LRAPA and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
6. **Recordkeeping:** The permittee must maintain records of the fugitive emissions surveys and corrective actions, as applicable. The record must be maintained onsite for a period of a least five (5) years and must be provided to LRAPA personnel on request. [LRAPA 34-016 and OAR 340-218-0050(3)(b)]

Nuisance Conditions

7. **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(1)] This condition is enforceable only by LRAPA.
8. **Monitoring and Recordkeeping Requirement:** The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include the date of complaint, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and date and time of response to complainant. A facility representative must immediately investigate the condition following the receipt of a nuisance complaint and a facility representative must provide a response to the complainant if possible, within 24 hours, but not longer than five (5) working days. [LRAPA 34-016 and OAR 340-218-0050(3)(a)] This condition is enforceable only by LRAPA.
9. **Applicable Requirement:** The permittee must not cause or permit the emission of particulate matter larger 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 enforceable only by LRAPA.

10. Monitoring Requirement: The permittee must monitor compliance with this applicable requirement using the facility inspections required in Condition 5. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
11. Applicable Requirement: The permittee must not discharge from any source whatsoever such quantities of air contaminants which cause injury or damage to any persons, the public, business or property; such determination to be made by LRAPA. [LRAPA 32-090(1)]
12. 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:
 - 12.a. Conceals an emission of air contaminant which would otherwise violate these rules; or [LRAPA 32-050(1)]
 - 12.b. Masks the emission of an air contaminant which causes or tends to cause detriment to health, safety or welfare of any person. [LRAPA 32-050(2)]
13. Monitoring Requirement: The permittee must monitor compliance with the applicable requirements in Conditions 11 and 12 using the compliance certifications required in Conditions 53.a and 53.b.iii. [LRAPA 34-016 and OAR 340-218- 0050(3)(a)]
14. 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. See Attachment A at the end of this permit
15. Monitoring and Recordkeeping Requirement: 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. [LRAPA 34-016 and OAR 340-218-0050(3)(a)]

Fuel Conditions

16. Applicable Requirement: The permittee must not burn any fuel other than natural gas, propane, butane, ASTM grade fuel oils, or on-specification used fuel oil (as defined in 40 CFR 279.11). [LRAPA 32-065]
 - 16.a. Distillate fuel oil or on-specification used oil must not contain more than:
 - 16.a.i. 0.3% sulfur by weight for ASTM Grade 1 fuel oil; [LRAPA 32-065(2)(a)]
 - 16.a.ii. 0.5% sulfur by weight for ASTM Grade 2 fuel oil. [LRAPA 32-065(2)(b)]
 - 16.b. Residual fuel oils must not contain more than 1.75% sulfur by weight. [LRAPA 32-065(1)]
17. Monitoring Requirement: The permittee must monitor the sulfur content of each shipment of fuel oil (ASTM Grade 1 or ASTM Grade 2) that will be used in auxiliary equipment other than exempt equipment such as forklifts and motor vehicles by: [LRAPA 34-016 and OAR 340-218-0050(3)(a)]
 - 17.a. Obtaining a certification of sulfur content from each vendor for each shipment of fuel received; or
 - 17.b. Secure a SDS from the fuel supplier and a certification stating that the supplier will provide only fuel oil that meets the specifications in Condition 16 for use in non-exempt or auxiliary equipment such as stationary fire water pump motors.

Accidental Release Prevention

18. Applicable Requirement: Should this stationary source 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]

40 CFR 63 SUBPART DDDD - PLWYOOD AND COMPOSITE WOOD PRODUCTS (PCWP) NESHAP

19. Applicable Requirement: The permittee must use exclusively non-HAP coatings for Group 1 Miscellaneous Coating Operations. [40 CFR 63.2241(a)]
- 19.a. For purposes of this requirement, *non-HAP coatings* are defined as coatings with HAP contents below 0.1 percent by mass for Occupational Safety and Health Administration-defined carcinogens as specified in section A.6.4 of appendix A to 29 CFR 1910.1200, and below 1.0 percent by mass for other HAP compounds. [40 CFR 63.2292]
- 19.b. For purposes of this requirement, *Group 1 Miscellaneous Coating Operations* are defined as application of edge seals, nail lines, logo (or other informational) paint, shelving edge fillers, trademark/gradestamp inks, and wood putty patches to plywood and composite wood products (except kiln-dried lumber) on the same site where the plywood and composite wood products are manufactured. [40 CFR 63.2292]
20. Monitoring Requirement: The permittee must maintain records documenting that only non-HAP coatings are used for Group 1 Miscellaneous Coating Operations. [40 CFR 63 Subpart DDDD; Table 6 and Table 8]
21. Reporting Requirement: The permittee must submit a signed statement that it is using only non-HAP coatings for Group 1 Miscellaneous Coating Operations. The signed statement must be included with the semi-annual compliance certification. (The initial statement was received January 20, 2005) [40 CFR 63 Subpart DDDD; Table 6]
22. Recordkeeping Requirement: The permittee must maintain a copy of each notification and report submitted to comply with this applicable requirement, including all documentation supporting any Initial Notification or Notification of Compliance Status. [40 CFR 63.2282(a)(1)]

Emissions Unit WRH Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-010(1)&(3)	23	Visible Emissions	20% opacity, 3 min. in 60 min.	Periodic VE observations	24
32-015(2)(b)(A)	26	PM	0.10 gr/dscf	I&M, Recordkeeping	24 and 25
40 CFR Part 64 (CAM – Compliance Assurance Monitoring)	27	PM	Emission Action Level/Indicator Range	O&M, Recordkeeping	27
32-045(1)	28	PM	7.00 lb/hr - Process Weight Limit	I&M, Recordkeeping	24 and 25

23. Applicable Requirement: (WRH Opacity Limits)

The permittee must not emit or allow to be emitted any visible emissions that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one (1) hour from emissions unit WRH. The emissions standard in this condition do not apply to fugitive emissions from a source or part of a source. [LRAPA 32-010(1)&(3)]

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

In addition to the monitoring required by Condition 27.b, the permittee must monitor visible emissions into the atmosphere from emissions unit WRH in accordance with the following procedures, test methods, and frequencies: [LRAPA 35-0120 and OAR 340-218-0050(3)]

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

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

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

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

- 24.c. The permittee must use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:
- 24.c.i. The initial monitoring frequency for performing visible emission tests and/or surveys must be monthly.
 - 24.c.ii. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 23, the surveys and/or observations need only be done once per quarter.
 - 24.c.iii. If an exceedance occurs, the surveys and/or observations for the exceeding monitoring point will start over with monthly surveys and/or observations, according to the monitoring frequency above.
- 24.d. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.
- 24.e. 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, the observer must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
25. Recordkeeping Requirement(s): (Inspection and Maintenance Requirements for WRH Visible Emissions)
- The permittee must maintain records of inspection and maintenance procedures for the baghouses for emissions unit WRH: [LRAPA 34-016 and OAR 340-218-0050(3)]
- 25.a. Monthly inspection records of the WRH system (piping, cyclones, baghouses, and associated ductwork for structural integrity, corrosions, and air leaks) recorded on inspection forms.
 - 25.b. Maintenance activity records of replacement of baghouse bags on occurrence (when broken and routinely) recorded in a maintenance log.
26. Applicable Requirement: (WRH Grain Loading Requirements)
- The permittee must not cause or allow the emission of particulate matter, in excess of 0.10 grain per standard cubic foot, from the point sources (i.e., non-fugitive) within emissions unit WRH. [LRAPA 32-015(2)(b)(A)]
27. Applicable Requirement(s): (Compliance Assurance Monitoring Requirements for WRH Grain Loading) [40 CFR Part 64, LRAPA 35-0200 and OAR 340-218-0050(3)]
- 27.a. The permittee must maintain records of inspection and maintenance procedures for the baghouses for emissions unit WRH as required by Condition 25.
 - 27.b. The permittee must record pressure drop each operating day using the differential pressure gauges on each baghouse in WRH. No later than the proceeding Wednesday, the permittee must calculate the average pressure drop of the previous calendar week from the daily readings for that period. The weekly period begins on Sunday and ends on Saturday. The calendar weekly average pressure drop readings must be within the following ranges for each baghouse in emissions unit WRH:

Baghouse ID	Pressure Drop Range (inches H ₂ O)
BH-1	0.1 to 4.0
BH-2	0.1 to 4.0
BH-3	0.1 to 5.0

The permittee must initiate corrective action if the weekly average pressure drop is outside of the range for any baghouse in emissions unit WRH. Operation of emissions unit WRH when the weekly average pressure drop is outside of the range for any baghouse is not, by itself, a violation of this permit.

28. Applicable Requirement: (Process Weight Rule Requirements)

The permittee must not cause or allow the emission of particulate matter in any one (1) hour from any baghouses included in emissions unit WRH in excess of 7.00 lb/hr in accordance with Table 1, LRAPA 32-8010, for the process weight allocated to the process. [LRAPA 32-045(1)]

Emissions Unit Presses, I-Line, and I-Oven Specific Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-010(3)	29	Visible Emissions	20% Opacity, 3 min in 60 min	Periodic VE observations	30

29. Applicable Requirement: (Presses Visible Emissions Applicable Requirement)

The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions units Presses, I-Line or I-Oven that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour. [LRAPA 32-010(3)]

30. Monitoring Requirement: (Presses Visible Emissions Monitoring Requirements)

The permittee must monitor visible emissions into the atmosphere from emissions unit Presses in accordance with the following procedures, test methods, and frequencies: [LRAPA 35-0120 and OAR 340-218-0050(3)]

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

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

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

- 30.b.ii. Visible emissions from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
- 30.c. The permittee must use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:
 - 30.c.i. The initial monitoring frequency for performing visible emission tests and/or surveys must be monthly.
 - 30.c.ii. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 29, the surveys and/or observations need only be done once per quarter.
 - 30.c.iii. If the surveys and/or observations conducted during two (2) consecutive quarters of operation show opacity within the applicable limits specified in Condition 29, the surveys and/or observations need only be done once per semi-annual period.
 - 30.c.iv. If an exceedance occurs, the surveys and/or observations for the exceeding monitoring point will start over with monthly surveys and/or observations, according to the monitoring frequency conditions above.
- 30.d. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.
- 30.e. 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, the observer must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.

Emissions Unit Press Heaters Specific Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirements	
				Method	Condition Number
32-010(3)	31	Visible Emissions	20% Opacity, 3 min in 60 min	Periodic VE observations	32
40 CFR Part 63, Subpart DDDDD	33	HAPs	Work Practices	Tune-ups	NA

31. Applicable Requirement: (Press Heaters Visible Emissions Applicable Requirement)

The permittee must not cause or allow the emissions of any air contaminant into the atmosphere from emissions unit Press Heaters that equal or exceed an average of 20 percent opacity for a period or periods aggregating more than three (3) minutes in any one hour. [LRAPA 32-010(3)]

32. Monitoring Requirement: (Press Heaters Visible Emissions Monitoring Requirements)

The permittee must monitor visible emissions into the atmosphere from emissions unit Press Heaters in accordance with the following procedures, test methods, and frequencies: [LRAPA 35-0120 and OAR 340-218-0050(3)]

- 32.a. Modified EPA Method 9 must be used to determine opacity, in accordance with the ODEQ Source Sampling Manual. Prior notification and a pre-test plan are not required to be submitted to LRAPA for each test or survey conducted. Each observation period must be a minimum of six (6) minutes, unless any one (1) reading is greater than the emissions limit for the emissions unit. In that case, the observation period must be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
- 32.b. Visible emissions testing, using Modified EPA Method 9, may be waived for emission unit Press Heaters provided both of the following conditions are met:
 - 32.b.i. The permittee must conduct a 6-minute visible emissions survey of each emissions unit, using EPA Method 22; and
 - 32.b.ii. Visible emissions from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
- 32.c. The permittee must use the following monitoring schedule for conducting the visible emissions tests and/or surveys required by this condition:
 - 32.c.i. The initial monitoring frequency for performing visible emission tests and/or surveys must be monthly.
 - 32.c.ii. If the surveys and/or observations conducted during four (4) consecutive months of operation show opacity within the applicable limits specified in Condition 31, the surveys and/or observations need only be done once per quarter.
 - 32.c.iii. If the surveys and/or observations conducted during two (2) consecutive quarters of operation show opacity within the applicable limits specified in Condition 31, the surveys and/or observations need only be done once per semi-annual period.
 - 32.c.iv. If an exceedance occurs, the surveys and/or observations for the exceeding monitoring point will start over with monthly surveys and/or observations, according to the monitoring frequency conditions above.
- 32.d. All visible emissions tests and surveys must be conducted during operating conditions that have the potential to create visible emissions.
- 32.e. 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, the observer must note such conditions on the data observation sheet and make at least three (3) attempts to conduct the surveys and/or tests at approximately 2-hour intervals throughout the day. The permittee must attempt to make the observations daily until a valid observation period is completed.
- 33. Applicable Requirement: (Press Heaters – 40 CFR 63 Subpart DDDDD NESHAP Requirements):
 - 33.a. [Reserved] Condition 33.a requirement met. Permittee certified compliance with the NESHAP on December 3, 2015 in accordance with 40 CFR 63.7495(b).
 - 33.b. For each device in emissions unit Press Heaters, the permittee must conduct a tune-up of the process heater biennially as specified in Conditions 33.b.i through 33.b.vi to demonstrate continuous compliance. Each biennial tune-up must be conducted no more than 25 months after

the previous tune-up. (The initial tune-up requirement was completed July 6, 2015) [40 CFR 63.7500(e), 63.7515(d), 63.7540(a)(11)]

- 33.b.i. As applicable, inspect the burner, and clean or replace any components of the burner as necessary (the permittee may delay the burner inspection until the next scheduled unit shutdown). At units where entry into a piece of process equipment or into a storage vessel is required to complete the tune-up inspections, inspections are required only during planned entries into the storage vessel or process equipment;
- 33.b.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;
- 33.b.iii. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure that it is correctly calibrated and functioning properly (the permittee may delay the inspection until the next scheduled unit shutdown);
- 33.b.iv. Optimize total emissions of CO. This optimization should be consistent with the manufacturer's specifications, if available, and with any NO_x requirement to which the unit is subject;
- 33.b.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
- 33.b.vi. Maintain on-site and submit, if requested by LRAPA, an annual report containing the information as follows:
 - 33.b.vi.A. 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 or process heater;
 - 33.b.vi.B. A description of any corrective actions taken as a part of the tune-up; and
 - 33.b.vi.C. 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.
- 33.c. [Reserved] Condition 33.c requirement met. Permittee conducted the one-time energy assessment of the boiler and its energy use systems on December 23, 2013 in accordance with 40 CFR 63.7495(b), 63.7575 and Table 3 to Subpart DDDDD of Part 63.
- 33.d. The permittee must be in compliance with the emission limits, work practice standards, and operating limits in 40 CFR Part 63, Subpart DDDDD. These emission and operating limits apply at all times the affected unit is operating except for the periods noted in § 63.7500(f). [40 CFR 63.7505(a)]
- 33.e. The permittee may submit only an annual compliance report, as applicable, as specified in paragraphs (b)(1) through (4) of § 63.7550, instead of a semi-annual compliance report. [40 CFR 63.7550]
- 33.f. [Reserved] Condition 33.f requirement met. Permittee submitted the Notification of Compliance Status on December 3, 2015 in accordance with 40 CFR 63.7545(e).

- 33.g. [Reserved] Condition 33.g requirement met. The permittee submitted a signed statement in the Notification of Compliance Status report on December 3, 2015 in accordance with 40 CFR 63.7545(e)(8)(i) certifying that the permittee conducted a tune-up of the emissions unit.
- 33.h. [Reserved] Condition 33.h requirement met. The permittee submitted a signed statement with the Notification of Compliance Status on December 3, 2015 in accordance with 40 CFR 63.7545(e)(8)(ii) certifying that the energy assessment was completed according to Table 3 of 40 CFR 63 Subpart DDDDD and was an accurate depiction of the facility at the time of the assessment.
- 33.i. The permittee must submit reports according to the following procedures: [40 CFR 63.7550(h)]
- 33.i.i. The permittee must submit all reports required by Table 9 of 40 CFR Part 63, Subpart DDDDD electronically to the EPA via 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. The permittee must begin submitting reports via CEDRI no later than 90 days after the form becomes available in CEDRI. [40 CFR 63.7550(h)(3)]
- 33.j. The permittee must keep records as follows: [40 CFR 63.7555(a) and 63.7560]
- 33.j.i. A copy of each notification and report submitted to comply with this subpart, including all documentation supporting any Initial Notification or Notification of Compliance Status submitted, according to the requirements in § 63.10(b)(2)(xiv). [40 CFR 63.7555(a)(1)]
- 33.j.ii. Records must be in a form suitable and readily available for expeditious review. [40 CFR 63.7560(a)]
- 33.j.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)]
- 33.j.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. [40 CFR 63.7560(c)]

Insignificant Activities Requirements

34. 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 an 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:
- 34.a. LRAPA 32-010(3) (20% opacity);
- 34.b. LRAPA 32-030(1)(a) (0.10 gr/dscf corrected to 12% CO₂ or 50% excess air for fuel burning

- equipment);
- 34.c. LRAPA 32-015(2) (0.10 gr/dscf for non-fugitive, non-fuel burning equipment);
- 34.d. LRAPA 32-045 (process weight limit for non-fugitive, non-fuel burning process equipment).
35. 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 the ODEQ Source Sampling Manual.

PLANT SITE EMISSION LIMITS

36. The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [LRAPA 42-0040 and 42-0041]

Annual (12-month rolling) PSELs (tons)

Pollutant	Assigned Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)	Emission Reduction Credits (tons/yr)
PM	24	19	0
PM ₁₀	14	27	0
PM _{2.5}	9	17	--
CO	99	0	--
NO _x	39	16	0
VOC	66	0	--
GHG	74,000	0	--

- 36.a. The Emission Reduction Credits (ERCs) that were established in the previous permitting term were available for internal or external use by the permittee for increases of emissions or for sale until the credits expired on April 2, 2016. The ERCs that were not used prior to the expiration date have become unassigned emissions for the purpose of the PSEL and are no longer available for use as external offsets. [LRAPA 41-0030(5)(b) and OAR 340-268-0010(5)(b)]
- 36.b. The permittee may only use Unassigned Emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by LRAPA.
- 36.c. Compliance with the GHG PSEL is determined through the annual report required by Condition 53.b, as applicable.

37. Monitoring Requirement: [LRAPA 35-0120, 42-0080 and OAR 340-218-0050(3)(a)]

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

37.a. Monitoring Requirement:

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

Recordkeeping of Process Parameters

Emissions Unit(s)	Process Parameter	Pollutant(s)	Measurement Technique	Measurement Frequency
I-Oven and Press Heaters	Natural gas used (MMscf)	PM, PM ₁₀ , PM _{2.5} , CO, NO _x , VOC, and GHG	Recordkeeping	Monthly
WRH	Amount of wood residuals trucked off site (BDT)	PM, PM ₁₀ and PM _{2.5}	Production Records	Monthly
WSO	Amount of LVL applied with WSO (cf LVL)	VOC	Recordkeeping	Monthly
Presses and I-Line	Amount and type of adhesive used (lbs)	VOC	Purchase Records	Monthly

37.b. Monitoring Requirement:

The permittee must determine compliance with the PSELs by calculating 12-month rolling emissions for each emissions units for all pollutants except GHGs by the end of the following month using the following formula and process parameters listed above, and the emission factors listed in Condition 38:

$$E = \sum_{i=1}^{12} [P_{eu_i} \times EF_{eu} \times K]$$

- where:
- E = pollutant emissions in tons/yr.
 - $\sum_{i=1}^{12}$ = symbol representing “summation of” with limits defined from current calendar month $i=1$ to preceding twelve months at $i=12$.
 - P_{eu_i} = process parameter identified in Condition 37.a for calendar month i .
 - EF_{eu} = emission factor identified for each emissions unit and pollutant in Condition 38.
 - K = conversion constant is 1 ton/2000 lbs for annual emissions calculations.

38. Monitoring Requirement: [LRAPA 35-0120, 42-0080 and OAR 340-218-0050(3)(a)]

Table of emission factors to be used for calculating emissions:

Emission Factors

Emissions Unit(s)	Pollutant	Emission Factor	Emission Factor Units	Emission Factor Verification Testing	
				Yes/No	Test Method
WRH	PM (non-fugitive)	0.001	lb/BDT	No	NA
	PM ₁₀ (non-fugitive)	0.001	lb/BDT	No	NA
	PM _{2.5} (non-fugitive)	0.001	lb/BDT	No	NA
	PM (fugitive)	0.086	lb/BDT	No	NA
	PM ₁₀ (fugitive)	0.029	lb/BDT	No	NA
	PM _{2.5} (fugitive)	0.015	lb/BDT	No	NA
I-Oven and Press Heaters	PM	2.5	lb/MMscf	No	NA
	PM ₁₀	2.5	lb/MMscf	No	NA
	PM _{2.5}	2.5	lb/MMscf	No	NA
	CO	84.0	lb/MMscf	No	NA
	NO _x	100.0	lb/MMscf	No	NA
	SO ₂	1.7	lb/MMscf	No	NA
	VOC	5.5	lb/MMscf	No	NA
I-Line Process	VOC	0.004	lb/lb adhesive	Yes	Heated sealed caul plate test
Presses	VOC	0.0027	lb/lb adhesive	Yes	Heated sealed caul plate test
WSO	VOC	0.002043	lb/cf LVL	Yes	Heated sealed caul plate test

38.a. The emissions factors listed in this condition are not enforceable limits unless otherwise specified in this permit. Compliance with PSEs must only be determined by the calculations contained in Condition 37.b.

38.b. The VOC emission factors for emissions units WSO, I-Line Process, and Presses must be verified

within 30 days of any permanent change in adhesive formulation(s). A permanent change in adhesive formulation is defined as the use of any new adhesive formulation in the respective emission unit for longer than one calendar month. The permittee must notify LRAPA of any permanent adhesive formulation change and provide the VOC emission factor verification testing results of such formulation changes or equivalent documentation from the adhesive supplier in lieu of verification testing results within 45 days of completion of the testing or receipt of the equivalent documentation from the adhesive supplier. Seasonal changes in a formulation does not constitute a permanent adhesive formulation change. The heated sealed caul plate testing must use representative conditions including, but not limited to, adhesive spread rate, veneer species, web and flange material, and any catalytic adhesive component(s).

EMISSION FEES

39. Emission fees will be based on the Plant Site Emissions Limits, unless the permittee elects to report actual emissions for one or more permitted processes/pollutants. [LRAPA 34-180 and OAR 340-220-0090]

GENERAL TESTING REQUIREMENTS

40. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the ODEQ Source Sampling Manual. [LRAPA 35-0120(3) and OAR 340-218-0050(3)(a)]
- 40.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.
- 40.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.
- 40.c. Unless otherwise specified by permit condition or LRAPA approved source test plan, all compliance source tests must be performed as follows:
- 40.c.i. At least 90% of the maximum design capacity for initial performance tests on new or modified equipment; or
- 40.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 no less than the 90th percentile of the average hourly operating rates during a 12-month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report. Average hourly operating rates can be determined by taking daily operating data and dividing by the number of hours of operation.
- 40.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.

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

General Monitoring Requirements:

41. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
42. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and may be no less rigorous than the requirements of OAR 340-218-0050(3)(a)(F)]
43. 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 Recordkeeping Requirements

44. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
 - 44.a. The date, place as defined in the permit, and time of sampling or measurements;
 - 44.b. The date(s) analyses were performed;
 - 44.c. The company or entity that performed the analyses;
 - 44.d. The analytical techniques or methods used;
 - 44.e. The results of such analyses;
 - 44.f. The operating conditions as existing at the time of sampling or measurement; and
 - 44.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
45. The permittee must maintain specific records of required monitoring information that include the following: [OAR-218-0050(3)(a)(A)]
 - 45.a. Weekly facility fugitive emissions inspection, maintenance, and corrective action log;
 - 45.b. Visible emissions tests and surveys;
 - 45.c. Pollution control device(s) inspection, maintenance, and repair log;
 - 45.d. Monthly and annual I-Line pounds of adhesive used;
 - 45.e. Monthly and annual LVL pounds of adhesive used;
 - 45.f. Monthly and annual standard cubic feet of natural gas used in I-Oven and Press Heaters;
 - 45.g. Monthly and annual BDT of truck-loading materials;
 - 45.h. Monthly and annual cubic feet of LVL with WSO applied;
 - 45.i. Excess emissions log;
 - 45.j. Pollutant emissions for the entire facility as required by Condition 37.b;
 - 45.k. Boiler NESHAP records required by Condition 33.j; and
 - 45.l. Control device operating parameter logs.
46. 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 due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [LRAPA 34-016, and OAR 340-214-0114 and 340-218-0050(3)(b)]

47. 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)]
48. 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 (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or LRAPA Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [LRAPA 34-016 and OAR 340-218-0050(3)(b)(B)]

REPORTING REQUIREMENTS

49. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [LRAPA Title 36]
- 49.a. Immediately (within one (1) hour after the permittee knew or should have known of an excess emission period) notify LRAPA by telephone, email, facsimile, or in person of any excess emission; and
 - 49.b. Within fifteen (15) days of the excess emissions event, submit a written report that contains the following information: [LRAPA 36-025(1)]
 - 49.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;
 - 49.b.ii. The date and time the owner or operator notified LRAPA of the event;
 - 49.b.iii. The equipment involved;
 - 49.b.iv. Whether the event occurred during startup, shutdown, maintenance, or as a result of a breakdown, malfunction, or emergency;
 - 49.b.v. Steps taken to mitigate emissions and corrective actions taken;
 - 49.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 a best estimate, supported by operating data and calculations;
 - 49.b.vii. The final resolution of the cause of the excess emissions; and
 - 49.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to an emergency pursuant to LRAPA 36-040.
 - 49.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends, or holidays, the permittee must immediately notify LRAPA by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
 - 49.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.
 - 49.e. 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 49.a.
 - 49.f. The permittee must continue to maintain a log of all excess emissions in accordance with LRAPA 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)]
50. Permit Deviations 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 15 days of the deviation. Deviations that cause excess emissions, as specified in LRAPA Title 36 must be reported in accordance with Condition 49. [OAR 340-218-0050(3)(c)(B)]

51. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5). [OAR 340-218-0050(3)(c)(D)]
52. Reporting requirements must commence on the date of permit issuance unless otherwise specified in the permit. [OAR 340-218-0050(3)(c)(E)]

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

Lane Regional Air Protection Agency
1010 Main Street
Springfield, OR 97477

Clean Air Act Compliance Manager
U.S. Environmental Protection Agency

Region 10 OCE-101
1200 Sixth Avenue, Suite 900
Seattle, WA 98101
Email: hardesty.doug@epa.gov

Semi-annual and Annual Reports

53. The permittee must submit three (3) copies of reports of any required monitoring at least every six (6) months, completed on forms approved by LRAPA. Six-month periods are January 1 to June 30, and July 1 to December 31. Two copies of the report must be submitted to LRAPA and one copy to the EPA. All instances of deviations from permit requirements must be clearly identified in such reports: [OAR 340-218-0050(3)(c)(A) and 340-218-0080(6)(d)]
 - 53.a. The first semi-annual report is due **by August 30th** and must include the semi-annual compliance certification specified in Condition 54. [OAR 340-218-0080]
 - 53.b. The annual report is due **by March 15th** and must consist of the following:
 - 53.b.i. The emission fee report; [OAR 340-220-0100]
 - 53.b.ii. The excess emissions upset log; [LRAPA 36-025]
 - 53.b.iii. The second semi-annual compliance certification; [OAR 340-218-0080]
 - 53.b.iv. The annual certification that the risk management plan is being properly implemented or confirmation that the risk management plan requirements have not been triggered; [OAR 340-218-0080(7)]
 - 53.b.v. The parameters and calculations required by Condition 37;
 - 53.b.vi. Boiler NESHAP reporting required by Condition 33.e; and
 - 53.b.vii. The annual report must also include annual greenhouse gas (GHG) emissions in accordance with OAR 340 Division 215, as applicable. [OAR 340-215-0010(2) and 340-215-0040]
54. 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)]
 - 54.a. The identification of each term or condition of the permit that is the basis of the certification;
 - 54.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;

- 54.c. The status of compliance with terms and conditions of the permit for the period covered by the certification, including whether compliance during the period was continuous or intermittent. The certification must be based on the method or means designated in Condition 54.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;
- 54.d. Such other facts as LRAPA may require to determine the compliance status of the source;
- 54.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator may use monitoring as required in OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications; [OAR 340-218-0080(6)(e)]
- 54.f. Number of CAM excursions and corrective action; and
- 54.g. A signed statement certifying compliance with the requirements in Condition 19.

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

55. The following Local, State and 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 60, Subpart Dc	Standards of Performance for Small Industrial- Commercial- Institutional Steam Generating Units	The process heaters are not boilers and are not subject to the NSPS. In addition, both process heaters each have a maximum heat input value rating of less than 10 MMBtu/hour (9.4 MM Btu/hour as per manufacturer).
40 CFR Part 63, Subpart JJJJJ ('6J')	National Emission Standards for Hazardous Air Pollutants for Area Sources: Industrial, Commercial, and Institutional Boilers	The heaters at this facility are not subject to the area source NESHAP because the facility is a major source and process heaters are not regulated under the area source NESHAP.
LRAPA 33-060	Board products rule	Engineered lumber sources are not included in the Board products rule.
40 CFR Part 63 Subpart CCCCC ('6C')	Emission Standards for Gasoline Dispensing Facilities (GDFs)	This facility is not subject to the GDF NESHAP because the facility does not have any GDFs.

Rule Citation	Summary	Reason for Not Being Applicable
40 CFR Part 63 Subpart <i>ZZZZ</i> (‘4Z’)	Emission Standards for stationary compression ignition (CI) or spark ignition (SI) Reciprocating Internal Combustion Engines (RICE)	This facility is not subject to the CI or SI RICE NESHAP because the facility does not have any RICEs.

KE/CMW
12/01/2020

GENERAL CONDITIONS

G1. General Provision

Terms not otherwise defined in the permit shall have the meaning assigned to such terms in the referenced regulation.

G2. Reference Materials

Where referenced in this permit, the versions of the following materials are effective as of the dates noted unless otherwise specified in the permit:

- a. Source Sampling Manual; November 2018;
- 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 shall comply with all conditions of the federal operating permit. Any permit condition noncompliance constitutes a violation of the Federal Clean Air Act and/or state rules and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application. Any noncompliance with a permit condition specifically designated as enforceable only by the state constitutes a violation of state rules only and is grounds for enforcement action; for permit termination, revocation and re-issuance, or modification; or for denial of a permit renewal application.
- b. Any schedule of compliance for applicable requirements with which the source is not in compliance at the time of permit issuance shall be supplemental to, and shall not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

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 49-040] 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. [LRAPA 34-017]

G7. Certification [OAR 340-214-0110, 340-218-0040(5), 340-218-0050(3)(d), and 340-218-0080(2)]

Any document submitted to LRAPA or EPA pursuant to this permit shall contain certification by a responsible official of truth, accuracy and completeness. All certifications shall state that based on information and belief formed after reasonable inquiry, the statements and information in the document are true, accurate, and, complete. The permittee shall promptly, upon discovery, report to LRAPA a material error or omission in these records, reports, plans, or other documents.

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 340-248-0200 through 340-248-0280, and LRAPA 43-015 (LRAPA-only enforceable)]

The permittee shall comply with OAR 340-248-0200 through 340-248-0280, 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 shall 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 shall be deemed compliance with any applicable requirements as of the date of permit issuance provided that:
 - i. such applicable requirements are included and are specifically identified in the permit, or
 - ii. LRAPA, in acting on the permit application or revision, determines in writing that other requirements specifically identified are not applicable to the source, and the permit includes the determination or a concise summary thereof.
- b. Nothing in this rule or in any federal operating permit shall alter or affect the following:
 - i. the provisions of ORS 468.115 (enforcement in cases of emergency) and ORS 468.035 (function of department);
 - ii. the liability of an owner or operator of a source for any violation of applicable requirements prior to or at the time of permit issuance;
 - iii. the applicable requirements of the national acid rain program, consistent with Section 408(a) of the FCAA; or
 - iv. the ability of LRAPA to obtain information from a source pursuant to ORS 468.095 (investigatory authority, entry on premises, status of records).

- c. Sources are not shielded from applicable requirements that are enacted during the permit term, unless such applicable requirements are incorporated into the permit by administrative amendment, as provided in OAR 340-218-0150(1)(h), significant permit modification, or reopening for cause by LRAPA.

G12. Inspection and Entry [OAR 340-218-0080(3)]

Upon presentation of credentials and other documents as may be required by law, the permittee shall allow Lane Regional Air Protection Agency, or an authorized representative (including an authorized contractor acting as a representative of the EPA Administrator), to perform the following:

- a. Enter upon the permittee's premises where a 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 shall pay an annual base fee and an annual emission fee for all regulated air pollutants except for carbon monoxide, any class I or class II substance subject to a standard promulgated under or established by Title VI of the Federal Clean Air Act, or any pollutant that is a regulated air pollutant solely because it is subject to a standard or regulation under Section 112(r) of the Federal Clean Air Act. The permittee shall submit payment to Lane Regional Air Protection Agency, 1010 Main Street, Springfield, 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 shall be submitted in writing to LRAPA. Payment shall be made regardless of the dispute. User-based fees shall be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

G14. Off-Permit Changes to the Source [OAR 340-218-0140(2)]

- a. The permittee shall monitor for, and record, any off-permit change to the source that:
 - i. Is not addressed or prohibited by the permit;
 - ii. Is not a Title I modification;
 - iii. Is not subject to any requirements under Title IV of the FCAA;
 - iv. Meets all applicable requirements;
 - v. Does not violate any existing permit term or condition; and
 - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in LRAPA Title 12.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), shall be submitted to LRAPA and the EPA.

- c. The permittee shall keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 shall not extend to off-permit changes.

G15. Section 502(b)(10) Changes to the Source [OAR 340-218-0140(3)]

- a. The permittee shall monitor for, and record, any Section 502(b)(10) change to the source, which is defined as a change that would contravene an express permit term but would not:
 - i. Violate an applicable requirement;
 - ii. Contravene a federally enforceable permit term or condition that is a monitoring, recordkeeping, reporting, or compliance certification requirement; or
 - iii. Be a Title I modification.
- b. A minimum 7-day advance notification shall be submitted to LRAPA and the EPA in accordance with OAR 340-218-0140(3)(b).
- c. The permit shield of Condition G11 shall not extend to Section 502(b)(10) changes.

G16. Administrative Amendment [OAR 340-218-0150]

Administrative amendments to this permit shall be requested and granted in accordance with OAR 340-218-0150. The permittee shall promptly submit an application for the following types of administrative amendments upon becoming aware of the need for one, but no later than 60 days of such event:

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

G17. Minor Permit Modification [OAR 340-218-0170]

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

G18. Significant Permit Modification [OAR 340-218-0180]

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

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 Title 38]

No permittee shall construct or make modifications required to be reviewed under New Source Review (LRAPA 38-001) without receiving an Air Contaminant Discharge Permit (ACDP) (LRAPA 34-010) and having satisfied the requirements of LRAPA Title 38.

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 340-218-020]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by LRAPA.
- b. A permit shall be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of the permit for which cause to reopen exists.

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 shall 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 shall be submitted at least 12 months before the expiration of this permit, unless LRAPA requests an earlier submittal. If more than 12 months is required to process a permit renewal application, LRAPA 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 shall 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 shall have available at the facility at all times a copy of the LRAPA Title V Operating Permit and shall provide a copy of the permit to LRAPA or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

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