Standard

air contaminant discharge permit

Department of Environmental Quality

475 NE Bellevue Dr, Suite 110

Bend, OR 97701

This permit is being issued in accordance with the provisions of ORS 468A.040 and

based on the land use compatibility findings included in the permit record.

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| ISSUED TO:  D. R. Johnson Lumber Co.  dba Prairie Wood Products  PO Box 66  Riddle, OR 97469 | INFORMATION RELIED UPON:  Application No.: 26503  Date Received: 10/18/2011 |
| PLANT SITE LOCATION:  457 Front Street  Prairie City, OR 97869 | LAND USE COMPATIBILITY FINDING:  Approving Authority: Grant County and  Prairie City  Approval Date: 7/18/1984 & 7/19/1984 |
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**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

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Mark W. Bailey, Eastern Region Air Quality Manager Dated

Source(s) Permitted to Discharge Air Contaminants (OAR 340-216-0020):

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| --- | --- | --- |
| **Table 1 Code** | **Source Description** | **SIC** |
| Part B, #71 | Sawmills and/or Planing Mills 25,000 or more bd. ft./maximum 8 hr. finished product | 2421 |
| Part B, #13 | Boilers and other Fuel Burning Equipment over 10 MMBtu/hr. heat input, except exclusively Natural Gas and Propane fired units (with or without #2 diesel backup) under 30 MMBtu/hr. heat input. | 4961 |

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# GENERAL emission standards AND LIMITS

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| Visible Emissions | Emissions from any air contaminant source must not equal or exceed 20% opacity for a period aggregating more than 3 minutes in any one hour. |
| Particulate Matter Emissions | Particulate matter emissions from the Wellons boiler must not exceed 0.1 grains per standard cubic foot, corrected to 12% CO2 or 50% excess air. |
|  | Particulate matter emissions from any air contaminant source other than the boiler and fugitive emission sources must not exceed 0.1 grains per standard cubic foot. |
| Fugitive Emissions | The permittee must take reasonable precautions to prevent fugitive dust emissions by: |
| Treating vehicular traffic areas of the plant site under the control of the permittee; |
| Operating all air contaminant-generating processes so that fugitive type dust associated with the operation will be adequately controlled at all times; and |
| Storing collected materials from air pollution control equipment in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer. |
| 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. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled. |
| 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 Department personnel. |
| Fuels and Fuel Sulfur Content | The permittee must not use any fuel other than wood waste or on-specification used oil. |
|  | The permittee is allowed to use on-specification used oil as fuel which contains no more than 0.5% sulfur by weight. The permittee must obtain analyses from the marketer or, if generated on site, have the used oil analyzed, so that it can be demonstrated that each shipment of oil does not exceed the used oil specifications contained in 40 CFR Part 279.11, Table 1. |

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# specific performance and emission standards

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| Wellons Boiler – 40 CFR Part 63, Subpart JJJJJJ NESHAP Requirements | The NESHAP/MACT Standard for Industrial, Commercial and Institutional Boilers - *Boiler Area Source MACT (40 CFR Part 63 Subpart JJJJJJ)* applies to the Wellons Boiler because the boiler combusts biomass. The permittee may only burn *biomass*. *Biomass* means any biomass-based solid fuel that is not a solid waste as defined in 40 CFR 241.3. This includes, but is not limited to: Wood residue and wood products, including trees, tree stumps, tree limbs, bark, lumber, sawdust, sander dust, chips, scraps, slabs, millings and shavings;animal manure, including litter and other bedding materials;vegetative agricultural and silvicultural materials, including logging residues (slash), nut and grain hulls and chaff , bagasse, orchard prunings, corn stalks, coffee bean hulls and grounds. |
| Boiler Tune-Up Requirements | No later than March 21, 2012, the permittee must conduct a performance tune-up and every two years thereafter as follows: [40 CFR 63.11196(a)(1), 63.11201(b), 63.11214(b) and 63.11223] |
|  | Inspect the burner, and clean or replace any components of the burner as necessary. The burner inspection may be delayed until the next scheduled boiler shutdown, but each burner must be inspected at least once every 36 months; |
|  | Inspect the flame pattern, and adjust the burner as necessary to optimize the flame pattern. Any adjustment must be consistent with the manufacturer’s specifications for the burner, if available; |
|  | Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly; |
|  | Measure the exhaust concentration of carbon monoxide (ppmv) and oxygen (%), before and after the adjustments are made. Measurements may be made either on a dry or wet basis, as long as it is the same basis before and after any adjustments are made; |
|  | Optimize the total emissions of carbon monoxide. This optimization must be consistent with the manufacturer’s specifications, if available; |
|  | If the boiler is not operating on the required date for the tune-up, the tune-up must be conducted within one week of startup; and |
|  | Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. |
| Tune-Up Reports | The permittee must maintain biennial reports containing the tune-up information as required in Condition 2.2, specifically: [40 CFR 63. 11223(b)(6) (i) through (iii) and 63.11225(c)(2) (i) and (ii)] |
|  | Identification of the boiler, date of tune up, the procedures followed for the tune-up, and the manufacturer’s specifications to which the boiler was tuned; |
|  | The CO concentrations in the exhaust in ppmv, and oxygen %, measured before and after the tune-up, as detailed in Condition 2.2.d; |
|  | A description of any corrective actions taken as part of the tune-up; |
|  | The type and amount of fuel used each month over the 12 months prior to the biennial tune-up; and |
|  | These records must be maintained onsite, in a form suitable for inspection and/or submittal upon request. |
| Notification of Compliance Status for the Initial Tune-Up | No later than July 19, 2012, the permittee must submit the Notification of Compliance Status including the statement, signed by the responsible official, that states: “This facility complies with the requirements in 40 CFR 63.11214 to conduct an initial tune-up of the boiler.” [40 CFR 63.11225(a)(4)(i)] |
| Energy Assessment | No later than March 21, 2014, the permittee must conduct an energy assessment of the boiler and its energy use systems. [40 CFR 63.11214(c), 63.11237 and Table 2 to Subpart JJJJJJ of Part 63] |
|  | The energy assessment must be conducted as follows dependent on the annual heat input to the facility:For facilities with affected boilers using less than 300,000 MMBtu (0.3 trillion Btu) per year total heat input, the energy assessment must be no less than one day in length. The boiler system and *energy use system* accounting for at least 50 percent of the affected boiler(s) energy output must be evaluated to identify energy savings opportunities.For facilities with affected boilers and process heaters using greater than 300,000 MMBtu (0.3 trillion Btu), but less than 1,000,000 MMBtu (1 trillion Btu) per year total heat input, the energy assessment must be no less than three days in length. The boiler system and *energy use system* accounting for at least 33 percent of the affected boiler(s) energy output must be evaluated to identify energy savings opportunities.For facilities with affected boilers and process heaters using more than 1,000,000 MMBtu (1 trillion Btu) per year total heat input. The boiler system and *energy use system* accounting for at least 20 percent of the affected boiler(s) energy output must be evaluated to identify energy savings opportunities. |
|  | The energy assessment must include:A visual inspection of the boiler system;An evaluation of operating characteristics of the facility, specifications of *energy use systems*, operating and maintenance procedures, and unusual operating constraints;*Energy use systems* include, but are not limited to process heating, compressed air systems, machine drive (pumps, motors, fans), process cooling, facility heating, ventilation and air conditioning (HVAC) systems, hot heater systems, building envelope, and lighting;An inventory of major systems consuming energy from each affected boiler(s);A review of available architectural and engineering plans, facility operation and maintenance procedures and logs, and fuel usage;A list of major energy conservation measures; andA comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments. |
| Notification of Compliance Status for the Energy Assessment | No later than July 19, 2014, the permittee must submit the Notification of Compliance Status including the statement, signed by the responsible official, that states: “This facility has had an energy assessment performed according to 40 CFR 63.11214(c).” [40 CFR 63.11225(a)(4)(ii)] |
| Ongoing Reporting, Notification, and General Provision Requirements | The permittee must prepare a biennial compliance report and include it with the annual report specified in Condition 6.2. The report must include the following: [40 CFR 63.11225(b)] |
| Company name and address;Statement by a responsible official, with the official’s name, title, phone number, e-mail address and signature, certifying the truth, accuracy and completeness of the notification and a statement of whether the source has complied with all of the relevant standards and other requirements of 40 CFR Part 63, Subpart JJJJJJ.If the source experiences any deviations from the applicable requirements during the reporting period, include a description of the deviations, the time periods during which the deviations occurred, and the corrective action taken. |
|  | Notification 30 days prior to commencing combustion of solid waste including the following information: [40 CFR 63.11225(f)] |
|  | The name of the owner or operator of the affected source, the location of the source, the boilers(s) that will commence burning solid waste, and the date of the notice;The currently applicable subcategory under 40 CFR Part 63, Subpart JJJJJJ;The date on which the boilers became subject to the currently applicable emission limits; andThe date upon which combusting solid waste will commence. |
|  | Notification 30 days prior to switching to a fuel(s) that may result in the applicability of a different subcategory or a switch out of 40 CFR Part 63, Subpart JJJJJJ due to a switch to 100 percent natural gas, including the following information: [40 CFR 63.11225(g)] |
|  | The name of the owner or operator of the affected source, the location of the source, the boiler(s) that will switch fuels, and the date of the notice;The currently applicable subcategory under 40 CFR Part 63, Subpart JJJJJJ;The date on which the boilers became subject to the currently applicable emission limits; andThe date upon which the fuel switch will commence. |
|  | The General Provisions of 40 CFR Part 63 are incorporated by reference in accordance with Table 8 of Subpart JJJJJJ. [40 CFR 63.11235] |

# plant site emission limits

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| Plant Site Emission Limits (PSEL) | Plant site emissions must not exceed the following: | | |
| **Pollutant** | **Limit** | **Units** |
| PM | 24 | tons per year |
| PM10 | 14 | tons per year |
| PM2.5 | 13 | tons per year |
| SO2 | 39 | tons per year |
| NOx | 39 | tons per year |
| CO | 99 | tons per year |
| VOC | 99 | tons per year |
|  | Single HAP | 9 | tons per year |
|  | Total HAPS | 24 | tons per year |
| Annual Period | The annual plant site emission limits apply to any 12-consecutive calendar month period. | | |

# compliance demonstration

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| Monitoring Requirements | The permittee must monitor the operation and maintenance of the plant and associated air contaminant control devices as follows: |
|  | All operating and production parameters to be reported to the Department annually as required in Condition 6.2.a. |
|  | Records of excess emissions (recorded on occurrence). |
|  | A description of any maintenance to the Wellons backup boiler (recorded on occurrence). |
| PSEL Compliance Monitoring | Compliance with the PSEL is determined for each 12-consecutive calendar month period based on the following calculation for each pollutant:  E = Σ(EF x P)/2,000 lbs  Where,  E = Pollutant emissions (ton/yr);  EF = Pollutant emission factor (see Condition 10.0) |
| Emission Factors | The permittee must use the default emission factors provided in Condition 10.0 for calculating pollutant emissions, unless alternative emission factors are approved by the Department. The permittee may request or the Department may require using alternative emission factors provided they are based on actual test data or other documentation (e.g., AP-42 compilation of emission factors) that has been reviewed and approved by the Department. |

# recordkeeping requirements

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| Operation and Maintenance | The permittee must maintain the following records related to the operation and maintenance of the plant and associated air contaminant control devices: |
| Steam production of the Wellons backup boiler (lbs/month); |
| Amount of lumber, by species, kiln dried (bd. ft./month); |
| Cyclone throughput (lbs/month). |
| Excess Emissions | The permittee must maintain records of excess emissions as defined in OAR 340-214-0300 through 340-214-0340 (recorded on occurrence). Typically, excess emissions are caused by process upsets, startups, shutdowns, or scheduled maintenance. In many cases, excess emissions are evident when visible emissions are greater than 20% opacity for 3 minutes or more in any 60-minute period. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must cease operation of the equipment or facility no later than 48 hours after the beginning of the excess emissions, unless continued operation is approved by the Department in accordance with OAR 340-214-0330(4). |
| Complaint Log | The permittee must maintain a log of all written complaints and complaints received via telephone 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. |
| Retention of Records | Unless otherwise specified, all records must be maintained on site for a period of two (2) years and made available to the Department upon request. |

# reporting requirements

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| Excess Emissions | The permittee must notify the Department of excess emissions events if the excess emission is of a nature that could endanger public health. |
|  | Such notice must be provided as soon as possible, but never more than one hour after becoming aware of the problem. Notice must be made to the regional office identified in Condition 7.4 by e-mail, telephone, facsimile, or in person. |
|  | If the excess emissions occur during non-business hours, the permittee must notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311. |
|  | The permittee must also submit follow-up reports when required by the Department. |
| Annual Report | For each year this permit is in effect, the permittee must submit to the Department by **February 15** two (2) copies of the following information for the previous calendar year: |
|  | Operating parameters: |
|  | Sawmill production (bd. ft./yr); |
|  | Annual steam production for the backup boiler (lbs/yr); |
|  | Type and amount of woodwaste processed through the cyclones and Target Box (BDT/yr);Amount of wood dried in the kilns by species (MBF/yr);Annual emissions as calculated according to Condition 4.2. |
|  | Records of all planned and unplanned excess emissions events. |
|  | Summary of complaints relating to air quality received by permittee during the year. |
|  | List permanent changes made in plant process, production levels, and pollution control equipment which affected air contaminant emissions. |
|  | List major maintenance performed on pollution control equipment. |
| Greenhouse Gas Report | For each calendar year that the greenhouse emissions (as CO2e) equal or exceed 2,756 tons for CH4 + N2O, the permittee must submit to the Department by March 31 of the following year a greenhouse gas report using the EZ-Filer program online at: <http://deq12.deq.state.or.us/GHGonlineReporting/> |
| Notice of Change of Ownership or Company Name | The permittee must notify the Department in writing using a Departmental “Transfer Application” form *(AQ103)* within 60 days after the following: |
| Legal change of the name of the company as registered with the Corporations Division of the State of Oregon; or |
| Sale or exchange of the activity or facility. |
| Construction or Modification Notices | The permittee must notify the Department in writing using a Departmental “Notice of Intent to Construct” form *(AQ104)* and obtain approval in accordance with OAR 340-210-0205 through 340-210-0250 before: |
|  | Constructing, installing, or establishing a new stationary source that will cause an increase in any regulated pollutant emissions; |
| Making any physical change or change in operation of an existing stationary source that will cause an increase, on an hourly basis at full production, in any regulated pollutant emissions; or |
| Constructing or modifying any air pollution control equipment. |
| Where to Send Reports and Notices | The reports, with the permit number prominently displayed, must be sent to the Permit Coordinator for the region where the source is located as identified in condition 7.3. |

# Administrative requirements

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| Permit Renewal Application | The completed application package for renewal of this permit is due on **March 1, 2017**. Two (2) copies of the application must be submitted to the DEQ Permit Coordinator listed in Condition No. 7.3 |
| Permit Modifications | Application for a modification of this permit must be submitted not less than **60** days prior to the source modification. A special activity fee must be submitted with an application for the permit modification. The fees and two (2) copies of the application must be submitted to the Business Office of the Department. |
| Permit Coordinator’s Address | All reports, notices and applications should be directed to the Permit Coordinator for the area where the source is located. The Permit Coordinator’s address is as follows: |

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| **Permit Coordinator’s Address and Telephone** |
| Department of Environmental Quality  Eastern Region – Bend Office  475 NE Bellevue Dr., Suite 110  Bend, OR 97701  Telephone: (541) 633-2021 |

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| Department Contacts | Information about air quality permits and the Department’s regulations may be obtained from the DEQ web page at [www.oregon.gov/DEQ](http://www.oregon.gov/DEQ). All inquiries about this permit should be directed to the regional office for the area where the source is located. The Department’s regional office is as follows: |

| **Regional Office Address and Telephone** |
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| Department of Environmental Quality  Pendleton Office  700 SE Emigrant Avenue, Suite 330  Pendleton, OR 97801-2597  Telephone: (541) 276-4063 |

# fees

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| Annual Compliance Fee | The Annual Fee specified in OAR 340-216-0020, Table 2, Part 2 for a Standard ACDP is due on **December 1** of each year this permit is in effect. An invoice indicating the amount, as determined by Department regulations, will be mailed prior to the above date. |
| Change of Ownership or Company Name Fee | The non-technical permit modification fee specified in OAR 340-216-0020, Table 2, Part 3(a) is due with an application for changing the ownership or the name of the company. |
| Special Activity Fees | The special activity fees specified in OAR 340-216-0020, Table 2, Part 3 (b through i) are due with an application to modify the permit. |
| Where to Submit Fees | Fees must be submitted to:  Department of Environmental Quality  Business Office  811 SW Sixth Avenue  Portland, OR 97204-1390 |

# General conditions and disclaimers

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| Permitted Activities | This permit allows the permittee 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, or is revoked. |
| Other Regulations | In addition to the specific requirements listed in this permit, the permittee must comply with all other legal requirements enforceable by the Department. |

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| Conflicting Conditions | In any instance in which there is an apparent conflict relative to conditions in this permit, the most stringent conditions apply. |
| 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. |
| Department Access | The permittee must allow the Department’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. |
| Permit Availability | The permittee must have a copy of the permit available at the facility at all times. |

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| Open Burning | The permittee may not conduct any open burning except as allowed by OAR 340 Division 264. |
| Asbestos | The permittee must comply with the asbestos abatement requirements in OAR 340, Division 248 for all activities involving asbestos-containing materials, including, but not limited to, demolition, renovation, repair, construction and maintenance. |
| 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. |
| Permit Expiration | A source may not be operated after the expiration date of the permit, unless any of the following occur prior to the expiration date of the permit:  1. a timely and complete application for renewal or an Oregon Title V Operating Permit has been submitted; or 2. Another type of permit (ACDP or Oregon Title V Operating Permit) has been issued authorizing operation of the source.  For a source operating under an ACDP or Oregon Title V Operating Permit, a requirement established in an earlier ACDP remains in effect notwithstanding expiration of the ACDP, unless the provision expires by its terms or unless the provision is modified or terminated according to the procedures used to establish the requirement initially. |
| Termination, Revocation or Modification | DEQ may modify or revoke this permit pursuant to OAR 340-216-0082 and 340-216-0084. |

# Emission Factors

### **Criteria Pollutants:**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Emissions Device or Activity** | **Pollutant** | **Emission Factor (EF)** | **EF Units** | **EF Reference** |
| Wellons HF Boiler | PM | 0.4 | lb/Mlb Steam | DEQ Eestimate\* |
| PM10, PM2.5 | 0.34 |
| SO2 | 0.014 |
| NOx | 0.31 |
| CO | 1.0 |
| VOC | 0.02 | 1996 NCASI |
| Cyclones | PM | 0.5 | lb/ton | DEQ Estimate |
| PM10, PM2.5 | 0.25 |
| Target Box | PM | 0.1 | lb/ton |
| PM10, PM2.5 | 0.05 |
| Kilns | PM, PM10, PM2.5 | 0.02 | lb/M board feet | 1996 NCASI Study |
| VOC (Pine) | 2.0 |
| VOC (Fir) | 0.6 |

\*Assumes 85% of PM is PM10. Also assumes that 100% of PM2.5 is PM10.

### **Hazardous Air Pollutants:**

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| **Emissions Device or Activity** | **Pollutant** | **Emission Factor (EF)** | **EF Units** | **EF Reference** |
| Kilns | Methanol | 183 | lb/million board feet | OSU/NCASI 2007 dry kiln studies |
| Formaldehyde | 2.8 |
| Acetaldehyde | 113 |
| Propionaldehyde | 1.0 |
| Acrolein | 1.6 |
| Wellons Boiler | Methanol | 0.91 | lb/million lb steam | AP-42 |
| Formaldehyde | 1.4 |
| Acetaldehyde | 0.91 |
| Propionaldehyde | 0.05 |
| Acrolein | 0.02 |
| Benzene | 3.63 |
| Styrene | 2.1 |
| Toluene | 1.0 |
| Chlorine | 0.87 |
| Hydrogen Chloride | 0.74 |

# Process/Production Records

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| **Emissions Device or Activity** | **Process or Production Parameter** | **Frequency** |
| Backup HF Boiler | Pounds of Steam | Monthly |
| Cyclone Throughput | Bone Dry Tons |
| Target Box Throughput | Bone Dry Tons |
| Kiln Drying | M Board Feet of Fir Dried |
| M Board Feet of Pine Dried |

# Abbreviations, acronyms and definitions

|  |  |
| --- | --- |
| ACDP | Air Contaminant Discharge Permit |
| ASTM | American Society for Testing and Materials |
| AQMA | Air Quality Maintenance Area |
| calendar year | The 12-month period beginning January 1st and ending December 31st |
| CFR | Code of Federal Regulations |
| CO | Carbon Monoxide |
| CO2e | Carbon Dioxide Equivalent |
| DEQ | Oregon Department of Environmental Quality |
| Dscf | Dry standard cubic foot |
| EPA | US Environmental Protection Agency |
| FCAA | Federal Clean Air Act |
| Gal | Gallon(s) |
| GHG | Greenhouse Gas |
| gr/dscf | grains per dry standard cubic foot |
| HAP | Hazardous Air Pollutant as defined by OAR 340-244-0040 |
| I&M | Inspection and Maintenance |
| Lb | Pound(s) |
| MMBtu | Million British thermal units |
| NA | Not Applicable |
| NESHAP | National Emissions Standards for Hazardous Air Pollutants |
| NOx | Nitrogen Oxides |
| NSPS | New Source Performance Standard |
| NSR | New Source Review |
| O2 | Oxygen |
| OAR | Oregon Administrative Rules |
| ORS | Oregon Revised Statutes |
| O&M | Operation and Maintenance |
| Pb | Lead |
| PCD | Pollution Control Device |
| PM | Particulate Matter |
| PM10 | Particulate Matter less than 10 microns in size |
| PM2.5 | Particulate Matter less than 2.5 microns in size |
| ppm | part per million |
| PSD | Prevention of Significant Deterioration |
| PSEL | Plant Site Emission Limit |
| PTE | Potential to Emit |
| RACT | Reasonably Available Control Technology |
| scf | standard cubic foot |
| SER | Significant Emission Rate |
| SIC | Standard Industrial Code |
| SIP | State Implementation Plan |
| SO2 | Sulfur Dioxide |
| Special Control Area | as defined in OAR 340-204-0070 |
| VE | VisibleEemissions |
| VOC | Volatile Organic Compound |
| year | A period consisting of any 12- consecutive calendar months |