

**OREGON DEPARTMENT OF ENVIRONMENTAL QUALITY**  
**OREGON TITLE V OPERATING PERMIT**

Western Region  
4026 Fairview Industrial Dr. SE  
Salem, OR 97302  
Telephone: 503-378-8240

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:

Pacific Wood Laminates Inc.  
P.O. Box 820  
Brookings, OR 97415

INFORMATION RELIED UPON:

Application Number: 21096  
Received: 7/1/04, Revised 5/2017  
Addendum: 1/13/09, 4/6/09, 7/3/19

PLANT SITE LOCATION:

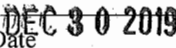
819 Railroad Avenue  
Brookings, OR 97415

LAND USE COMPATIBILITY STATEMENT:

Issued by: City of Brookings  
Dated: 03/29/91

ISSUED BY THE DEPARTEMENT OF ENVIRONMENTAL QUALITY

  
Claudia Davis, Western Region Air Quality Manager

  
Date

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<u>Nature of Business</u>	<u>SIC</u>	<u>NAICS</u>
Plywood Manufacturing	2436	321212
Laminated Veneer Lumber	2439	321213
Steam production	4961	221330

RESPONSIBLE OFFICIAL

Name: Nolan Roy  
Title: Operations Manager

FACILITY CONTACT PERSON

Name: Sean Rimes  
Title: Senior Product Engineer  
Phone: 541-469-4177

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## LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT

ACDP	Air Contaminant Discharge Permit	Mlbs	1000 pounds
Act	Federal Clean Air Act	MSF	1000 square feet
ASTM	American Society of Testing and Materials	NA	Not applicable
Btu	British thermal unit	NO <sub>x</sub>	Nitrogen oxides
CFR	Code of Federal Regulations	O <sub>2</sub>	Oxygen
CO	Carbon Monoxide	OAR	Oregon Administrative Rules
CO <sub>2</sub> e	carbon dioxide equivalent	ODEQ	Oregon Department of Environmental Quality
CPMS	Continuous parameter monitoring system	ORS	Oregon Revised Statutes
DEQ	Department of Environmental Quality	O&M	Operation and maintenance
dscf	Dry standard cubic feet	Pb	Lead
EF	Emission factor	PCD	Pollution Control Device
EPA	US Environmental Protection Agency	PM	Particulate matter
EU	Emissions Unit	PM <sub>10</sub>	Particulate matter less than 10 microns in size
FCAA	Federal Clean Air Act	PM <sub>2.5</sub>	Particulate matter less than 2.5 microns in size
FSA	Fuel sampling and analysis	ppm	Parts per million
GDF	Gasoline Dispensing Facility	PSEL	Plant Site Emission Limit
GHG	greenhouse gas	psia	pounds per square inch, actual
gr/dscf	Grain per dry standard cubic feet (1 pound = 7000 grains)	SERP	Source emissions reduction plan
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SO <sub>2</sub>	Sulfur dioxide
HCFC	Halogenated Chloro-Fluoro-Carbons	ST	Source test
ID	Identification number or label	TACT	Typically Achievable Control Technology
I&M	Inspection and maintenance	VE	Visible emissions
		VMT	Vehicle miles traveled
		VOC	Volatile organic compounds

## PERMITTED ACTIVITIES

1. Until such time as this permit expires or is modified or revoked, the permittee is allowed to discharge air contaminants from those processes and activities directly related to or associated with air contaminant source(s) in accordance with the requirements, limitations, and conditions of this permit. [OAR 340-218-0010 and 340-218-0120(2)]
2. All conditions in this permit are federally enforceable, meaning that they are enforceable by DEQ, EPA, and citizens under the Clean Air Act, except Conditions 6, 7, 8, G5, and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [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)]:

Table 1

Emissions Unit	EU ID	Pollution Control Device/Practice	PCD ID
Hogged fuel boiler	PH2	Wet scrubber	WS 1/WS 2
Materials transport: Hog fuel truck unloading, hog fuel pile and boiler feed conveyors, truck loading of ply trim, sawdust and sanderdust	MT	None	NA
Plywood press 1 Plywood press 2 Plywood press 3 Plywood press 4	Presses	None	NA
Pneumatic Conveyors group: Primary plytrim Cyclone, Cyclone 1/Baghouse 4 LVL Plytrim Cyclone/Baghouse 2 Hog fuel handling Cyclone/ Baghouse 3 Sanderdust Cyclone/Baghouse 1 Glue mixer exhaust fan	CON	Baghouse 4 Baghouse 2 Baghouse 3 Baghouse 1 None	BH4 BH2 BH3 BH1 NA
Veneer Dryers : Dryer A Dryer B Dryer C	Dryers	Regenerative Thermal Oxidizer/Regenerative Catalytic Oxidizer	RTO-1/RCO-1
Unpaved roads	WE	Watering	NA
Facility VOC	VOC	None	
Aggregate Insignificant activities including: Radiant propane heater, Maintenance Shop raw materials & solvents	AI	None	NA

## EMISSION LIMITS AND STANDARDS

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

### Facility wide Requirements

Table 2

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
340-208-0210(1-2)	4	Fugitive emissions	Minimize	Fugitive emission survey	5
340-208-0300	6	Air contaminants	No nuisance	Complaint Investigation	8
340-208-0450	7	PM >250μ	No fallout	Complaint Investigation	8
340-234-0510(2)	9	Particulate Matter	34.7 pounds/hour, daily basis	Recordkeeping	10
40 CFR Part 68	11	Risk management	Risk management plan	NA – below threshold	NA

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. [OAR 340-208-0210(1-2)]
  - 4.a. Such reasonable precautions must include, but not be limited to the following:
    - 4.a.i. 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.a.ii. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
    - 4.a.iii. Full or partial enclosure of materials stockpiles in cases where application of water or chemicals are not sufficient to prevent particulate matter from becoming airborne;
    - 4.a.iv. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
    - 4.a.v. Adequate containment during sandblasting or other similar operations;
    - 4.a.vi. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne;
    - 4.a.vii. Prompt removal from paved streets of earth or other material that does or may become airborne; and

- 4.a.viii. Remove all spillage caused by plug ups and/or leakage as soon as possible, but in no case later than 24 hours after discovery.
- 4.b. Upon request by DEQ, the permittee must develop a fugitive emission control plan for approval by DEQ if the above precautions are not adequate, and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
- 5. Monitoring Requirement: At least once each month for a minimum period of 30 minutes, the permittee must visually survey the plant for any sources of excess fugitive emissions. For the purpose of this survey, excess fugitive emissions are considered to be any visible emissions that leave the plant site boundaries for more than 18 seconds in a six-minute period. The person conducting the observation must follow the procedures of EPA Method 22. If sources of visible emissions are identified, the permittee must: [OAR 340-218-0050(3)(a)(C)]
  - 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 a DEQ approved fugitive emission control plan upon request by DEQ and implement the plan whenever fugitive emissions leave the property for more than 18 seconds in a six-minute period.
  - 5.c. Recordkeeping: The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 22 tests.

#### Nuisance Conditions

- 6. Applicable Requirement: The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by DEQ personnel. [OAR 340-208-0300] *This condition is enforceable only by the State.*
- 7. Applicable Requirement: The permittee must not cause or permit the deposition 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. [OAR 340-208-0450] *This condition is enforceable only by the State.*
- 8. Monitoring Requirement: The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 72 hours, if possible. *This condition is only enforceable by the state.* [OAR 340-218-0050(3)(a)]

#### Veneer and Plywood Manufacturing Operations Rule

- 9. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter in excess of 34.7 pounds per hour from emissions units MT and Presses on a daily basis, and determined by multiplying the plant production capacity by one pound per 1,000 square feet. [OAR-340-234-0510(2)].
- 10. Monitoring Requirement: The permittee must calculate the daily hourly average particulate matter emission rate of emissions units MT and Presses by dividing the amount of particulate matter emitted daily by the number of hours operated that day. No calculations are required so long as daily production of dried veneer does not exceed maximum of 1200 MSF 3/8" basis per day. No later than the 10<sup>th</sup> day of each month, the permittee must perform the calculations for each day of the previous calendar month. Records shall be maintained of either the calculations and the results compared to the standard or documentation

that the dried veneer production is less than or equal to the maximum MSF-3/8" per day. [OAR 340-218-0050(3)(a)]

### Risk Management Plan

11. Applicable Requirement: Should this stationary source become subject to the accidental release prevention regulations in 40 CFR Part 68, then 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]

### HOG FUEL BOILER (PH2)

**Table 3 - Summary of Requirements for Emission Unit Boiler PH2**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(6)	12	Visible emissions	20% opacity	6-minute block average	NA	13
340-228-0210(2)(b)(A)	14	PM	0.10 gr/dscf @ 12% CO <sub>2</sub>	Avg. of 3 test runs	19	15-18
40 CFR Part 63 Subpart JJJJJ	20	HAPs	Tune-up & one time energy assessment	Biennial tune-up	20.a, 20.b	21-25

### Visible Emission Standards for PH2

12. Applicable Requirement: The permittee must comply with the following visible emission limits for emissions unit PH2. Any visible emissions may not equal or exceed an average of 20% opacity [OAR 340-208-0110(6)]
- 12.a. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 12.c, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by: [OAR 340-208-0110(2)]
  - 12.b. EPA Method 9; or
  - 12.c. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
  - 12.d. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.
13. The permittee must monitor visible emissions from the stack of PH2 (WS1, WS2) by conducting an EPA Method 9 test on the frequency described in Condition 57. [OAR 340-218-0050(3)(a)(C)]

### Particulate Matter Standards for PH2

14. Applicable Requirement: The permittee must not cause or allow the emissions of particulate matter in excess of 0.10 gr/dscf corrected to 12% CO<sub>2</sub> from emissions unit PH2. [OAR 340-228-0210(2)(b)(A)]

### PM Emissions Monitoring (Compliance Assurance Monitoring)

15. The permittee shall monitor and record the outlet temperatures on WS1 and WS2 hourly, calculating hourly average temperatures from a minimum of four evenly spaced data points in each hour. [OAR 340-226-0120, 340-212-0210]
- 15.a. The permittee shall take corrective action any time the outlet temperature on the wet scrubbers

- (WS1, WS2) is greater than 200 degrees Fahrenheit.
- 15.b. An excursion from the specified outlet temperature shall not necessarily by itself be considered a violation of the particulate matter concentration limit in this permit.
  - 15.c. The permittee must verify calibration of the temperature monitor by using a calibrated probe semi-annually for each scrubber. Temperature variation of +/-30 degrees Fahrenheit is allowed. A larger discrepancy between the calibrated probe and the scrubber temperature monitor requires corrective action. Corrective action can include re-calibration or replacement of the temperature monitor.
  - 15.d. Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, the temperature monitor must be in continuous operation.
  - 15.e. Records must be maintained of all temperature monitor breakdowns, repairs, calibrations, and corrective action.
16. At least once per calendar year, the permittee shall inspect the control equipment of the boiler (PH2) for the following pollution control devices: [OAR 340-226-0120]
- 16.a. The multiclones shall be inspected for physical degradation that could affect the performance of the control device, including but not limited to any individual multiclones that are plugged, missing, or damaged to the extent that they are no longer effective. The permittee shall make all necessary repairs to the multiclone to ensure efficient operation as soon as possible. The results of the inspection and any repair activities shall be recorded in a log.
  - 16.b. The wet scrubbers on emissions unit PH2 shall be inspected for physical degradation that could affect the performance of the control device, including but not limited to plugged or missing spray nozzles. The permittee shall make all necessary repairs to the wet scrubbers to ensure efficient operation. The results of the inspection and any repair activities shall be recorded in a log.
17. The permittee shall continue to operate, maintain, calibrate, and record the output of the continuous monitoring system (CMS) in accordance with the manufacture's written instructions for measuring residual oxygen at emissions unit PH2. [OAR 340-226-0120, 340-212-0210]
- 17.a. Real time data shall be displayed at least once every minute that the boiler is in operation and a reading shall be recorded every 15-minutes. All data collected shall be maintained on site and available for inspection. Non-valid data shall be highlighted.
  - 17.b. Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, the residual oxygen meter must be in continuous operation.
  - 17.c. The oxygen meter must be calibrated or have a calibration check semi-annually, according to the manufacturer's specifications.
  - 17.d. Records must be maintained of all oxygen monitor breakdowns, repairs, calibrations, and corrective action.
  - 17.e. The permittee shall take corrective action anytime the oxygen readings for PH2 are less than 4% or greater than 14%. Records shall be maintained of any deviations and actions taken. The deviation from an action level parameter is not necessarily by itself a violation of the emissions standards. However, failure to take corrective action, when appropriate, is a violation of this permit
18. The permittee shall monitor the hours of operation for the boiler by recording the startup and shutdown date



and time and the duration of the startup and shutdown periods. [OAR 340-218-0050(3)(a)(C)]

### Emissions Testing for PH2

19. Emissions unit PH2 shall be tested once during this permit term and every 5 years after the permit expiration date until the permit is renewed. Subsequent tests shall be separated by at least 12 months from the prior test and be performed at least 6 months prior to the expiration date of this permit. [OAR 340-218-0050(3)(a)(C)]

- 19.a. Testing must consist of a minimum of three (3) 1-hour test runs [except for opacity (three 6-minute test runs)] for particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), and opacity.

- 19.a.i. The following test methods must be used unless DEQ approves another test method:

PM	ODEQ Methods 1-5
NO <sub>x</sub>	EPA Method 7E
CO	EPA Method 10
Opacity	EPA Method 9

- 19.b. Prior to source testing of these stacks, the permittee and/or its contractor shall determine whether cyclonic flow exists in the scrubber exhaust stacks. If cyclonic flow exists, the permittee can either install flow straighteners in the stacks to remove the cyclonic flow, or the source tester shall propose modifications to the PM and flow measurement test methods that account for the cyclonic flow (e.g., the 'Alignment Approach', EPA Method 2G).
- 19.c. Particulate matter (PM) test results shall be reported as grains per dry standard cubic foot (gr/dscf), grains per dry standard cubic foot at 12% CO<sub>2</sub> (gr/dscf @ 12% CO<sub>2</sub>), pounds per hour (lb/hr), pounds per 1000 pounds of steam (lb/1000 lb steam) and pounds per MMBtu (lb/MM Btu) of heat input. The PM concentration data shall be measured and reported for each of the scrubber exhaust stacks. The mass rate values shall be reported as total PM emissions from the boiler (i.e. both scrubbers combined). Heat input shall be determined according to EPA Method 19.
- 19.d. NO<sub>x</sub> and CO test results shall be reported as ppmvd, pounds per hour, pounds per 1000 pounds of steam produced and pounds per million Btu of heat input.
- 19.e. During each test run, the permittee shall record the following information:
- 19.e.i. fuel characteristics including moisture content, species, approximate percentage of wood and bark, and the percent by weight that passes a 1/8" sieve. The F-factor of the fuel can be either measured or based on the Method 19 F-factors, calculated to account for the relative quantities of wood and bark in the fuel blend.
  - 19.e.ii. visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each PM test run, unless weather conditions are such that it is not possible to read opacity;
  - 19.e.iii. the boiler excess oxygen (%);
  - 19.e.iv. pressure drop across the multiclone (inches of water column);
  - 19.e.v. liquid flow rate of the scrubbers, engineering estimate base on psi and #nozzles in service (gallons per minute);
  - 19.e.vi. the boiler steaming rate (lbs/hr);
  - 19.e.vii. temperature and pressure of the steam (°F)

### Area Source Boiler NESHAP Requirements for Boiler PH2

20. Applicable Requirement: The permittee must be in compliance with all requirements outlined in the Area Source NESHAP boiler rules for EU PH2. [40 CFR Part 63, Subpart JJJJJ]
- 20.a. The permittee must conduct an initial tune-up as specified in 40 CFR 63.11214 and conduct a tune-up of the boiler biennially as specified in 40 CFR 63.11223. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up. [40 CFR 63.11214(b) and 63.11223(b)]
  - 20.b. The permittee must conduct a one-time energy assessment according to 40 CFR 63.11237 by the compliance date of March 21, 2014. Note: This requirement has been completed. [40 CFR 63.11196 and 63.11210(c)]
  - 20.c. At all times, the permittee must operate and maintain EU PH2, including associated air pollution control equipment and monitoring equipment, in a manner consistent with safety and good air pollution control practices for minimizing emissions. The general duty to minimize emissions does not require the permittee to make any further efforts to reduce emissions if levels required by 40 CFR Part 63 Subpart JJJJJ have been achieved. Determination of whether such operation and maintenance procedures are being used will be based on information available to the DEQ that may include, but is not limited to, monitoring results, review of operation and maintenance procedures, review of operation and maintenance records, and inspection of the source. [40 CFR 63.11205(a)]
21. Recordkeeping: The permittee must maintain on-site and submit if requested by the DEQ, the records containing the information listed below: [40 CFR 63.11223(c)]
- 21.a. A copy of each notification and report that the permittee submitted to comply with 40 CFR Part 63 Subpart JJJJJ and all documentation supporting an Initial Notification of Notification of Compliance Status that the permittee submitted.
  - 21.b. The date of each tune-up, the procedures followed for tune-up, and the manufacturer's specifications to which the boiler was tuned.
  - 21.c. A copy of the energy assessment report.
  - 21.d. Records of the occurrence and duration of each malfunction of the boiler, or of the associated air pollution control and monitoring equipment.
  - 21.e. Records of actions taken during periods of malfunction to minimize emissions in accordance with the general duty to minimize emissions in 40 CFR 63.11205(a), including corrective actions to restore the malfunctioning boiler, air pollution control, or monitoring equipment to its normal or usual manner of operation.
  - 21.f. Records must be in a form suitable and readily available for expeditious review. The permittee must keep each record for 5 years following the date of each recorded action. The permittee must keep each record on-site or be accessible from a central location by computer or other means that instantly provide access at the site for at least 2 years after the date of each recorded action. The permittee may keep the records off site for the remaining 3 years.
22. The permittee must conduct a performance tune-up of Boiler EU PH2 every two years as follows: [40 CFR 63.11196(a)(1), 63.11201(b), 63.11214(b) and 63.11223]
- 22.a. 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;
  - 22.b. 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;
  - 22.c. Inspect the system controlling the air-to-fuel ratio, as applicable, and ensure it is correctly calibrated and functioning properly;
  - 22.d. 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;
  - 22.e. Optimize combustion so as to minimize the total emissions of carbon monoxide. This optimization

- must be consistent with the manufacturer's specifications, if available;
  - 22.f. 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
  - 22.g. Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
- 23. The permittee must maintain biennial reports containing the tune-up information as required in Condition 22, specifically: [40 CFR 63.11223(b)(6) (i) through (iii) and 63.11225(c)(2) (i) and (ii)]
  - 23.a. 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;
  - 23.b. The CO concentrations in the exhaust in ppmv, and oxygen %, measured before and after the tune-up, as detailed in Condition 22;
  - 23.c. A description of any corrective actions taken as part of the tune-up;
  - 23.d. These records must be maintained onsite, in a form suitable for inspection and/or submittal upon request.
- 24. The permittee must prepare a biennial compliance certification report for the previous biennial period and include it with the annual report specified in Condition 70. The report must include the following: [40 CFR 63.11225(b)]
  - 24.a. company name and address;
  - 24.b. 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 JJJJJ. The notification must include the following certifications of compliance, signed by a responsible official:
    - 24.b.i. "This facility complies with the requirements in 40 CFR 63.11223 to conduct a biennial tune-up of each boiler."
    - 24.b.ii. "No secondary materials that are solid wastes were combusted in any affected unit."
    - 24.b.iii. If the source experiences any deviations from the applicable requirements during the reporting period, include a description of deviations, the time periods during which the deviations occurred, and the corrective actions taken.
- 25. The General Provisions of 40 CFR Part 63 are incorporated by reference in accordance with Table 8 of Subpart JJJJJ. [40 CFR 63.11235]

#### **VD-A, VD-B, and VD-C)**

**Table 4 - Summary of Requirements for Emissions Units VD-A, VD-B and VD-C**

Applicable Requirement	Requirement Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition Number
340-234-0510(1)	26	Visible emissions	10% average, opacity 20% maximum opacity as 6 min. block average	VE, I & M	27, 32
340-226-0210(2)(b)	28	PM	0.10 gr/dscf (avg. of 3 test runs)	Monthly I & M, source test, CAM	32-37
340-226-0310	29	PM	Table 1 OAR 340 Division 226	Monthly I & M, source test, CAM	32-37
340-234-0510(1)(e) & (g)	30	Air contaminant emissions	Minimize with highest and best operation	Monthly I & M	32

Applicable Requirement	Requirement Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition Number
340-234-0510(1)(f)	31	Air contaminant emissions	Concealing emissions prohibited	Yearly I & M	33

#### Visible Emission Standards for VD-A, VD-B and VD-C

26. Applicable Requirement: The permittee shall not cause or allow the operation of emissions units VD-A, VD-B and VD-C such that visible air contaminants emitted from the dryer stacks, cooling sections, RTO/RCO exhaust or roof vents exceed an average operating opacity of ten percent or a maximum opacity of 20 percent. [OAR 340-234-0510(1)]

26.a. “Average operating opacity” means the opacity of emissions determined using EPA Method 9 on more than two days within a 12-month period, with the days separated from each other by at least 30 days. A violation of the average operating opacity limitation is judged to have occurred if the opacity of emissions on each of the three days is greater than the specified average operating opacity limitation. [OAR 340-234-0010]

26.b. “Maximum opacity” means the opacity at any time as determined by an EPA Method 9 visible emissions test. [OAR 340-234-0010]

27. Monitoring Requirement: The permittee must monitor visible emissions at the outlet of the cooling vents of each dryer (VD-A, VD-B, VD-C) and RTO-1/RCO-1 stack by conducting an EPA Method 9 test. [OAR 340-218-0050(3)(a)(C)]

27.a. The EPA Method 9 test method may be waived provided the permittee conducts a six (6) minute visible emissions survey on the device at the compliance demonstration point using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.

27.b. The visible emissions tests must be conducted on the frequency described in Condition 57.

27.c. If any test result exceeds the applicable standard in Condition 26, the permittee must initiate corrective action within 1-hour to bring the dryer into compliance with the applicable standards. Upon completion of the corrective actions, an EPA Method 9 test must be conducted as soon as is practicable to demonstrate that the source is in compliance with the applicable standard. If the permittee observes no further exceedances during the EPA Method 9 test, the monitoring frequency can go back to the previous monitoring frequency for the monitoring point that had an exceedance.

27.d. If the observer is unable to conduct the tests and/or surveys due to darkness or visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to conduct the tests daily until a valid observation period is completed.

27.e. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions (e.g., during veneer drying).

27.f. Recordkeeping: The permittee must maintain records of all visible emissions tests and surveys, including: date, time, observer, observations, results, and any corrective actions taken.

**Particulate Matter Standards for VD-A, VD-B and VD-C**

28. Applicable Requirement: The permittee must not cause or allow the emissions of particulate matter in excess of 0.10 gr/dscf from emissions units VD-A, VD-B and VD-C. [OAR 340-226-0210(2)(b)]
29. Applicable Requirement: The permittee must not cause, suffer, allow, or permit the emissions of particulate matter in any one hour from emissions units VD-A, VD-B and VD-C in excess of the amount shown in Table 1 of OAR 340 Division 226, for the process weight allocated to that process. [OAR 340-226-0310]
30. Applicable Requirement: VD-A, VD-B and VD-C shall be maintained and operated at all times such that air contaminant generating processes and all contaminant control equipment shall be at full efficiency and effectiveness so that the emission of air contaminants are kept at the lowest practicable levels. Where effective measures are not taken to minimize fugitive emissions, DEQ may require that the equipment or structures in which processing, handling, and storage are done, be tightly closed, modified, or operated in such a way that air contaminants are minimized, controlled, or removed before discharge to the open air. [OAR 340-234-0510(1)(e) and (g)]
31. Applicable Requirement: The permittee shall not willfully cause or permit the installation or use of any means, such as dilution, which, without resulting in a reduction in the total amount of air contaminants emitted, conceals an emission, which would otherwise violate OAR 340-234-0510. [OAR 340-234-0510(1)(f)]
32. Monitoring Requirement: At least once per month the permittee shall conduct an external inspection of VD-A, VD-B and VD-C for fugitive emissions and signs physical of degradation. [OAR 340-218-0050(3)(a)(C)]
- 32.a. Recordkeeping: Records shall be maintained of each inspection, findings, and corrective actions taken.
33. Monitoring Requirement: At least once per calendar year, the permittee shall inspect VD-A, VD-B and VD-C to ensure that the dryers have not been altered in such a manner that could conceal the discharge of air contaminant emissions without actually reducing emissions. [OAR 340-218-0050(3)(a)(C)]
- 33.a. Recordkeeping: Records shall be maintained of the inspections, findings, and actions taken.

**Monitoring for Emissions Unit Dryers (Compliance Assurance Monitoring)**

34. In order to provide compliance assurance for the particulate matter standards in Conditions 28 and 29, the following monitoring is required: [OAR 340-226-0120]
- 34.a. The RTO chamber temperature must be continuously monitored, whenever the veneer dryers are operating with green veneer being fed into the dryer.
- 34.b. The RTO combustion chamber temperature must be maintained at a minimum of 1200°F, as a 3 hour rolling average, or the average temperature measured in a source test that demonstrates a minimum of 70% VOC destruction efficiency.
- 34.c. Once the RTO is converted to an RCO with the addition of catalyst, the RCO combustion chamber temperature must be maintained at a minimum of 720°F, as a 3 hour rolling average, or the average temperature measured in a source test that demonstrates a minimum of 70% VOC destruction efficiency.
35. An excursion from the specified RTO chamber temperature shall not necessarily by itself be considered a violation of the particulate matter concentration limit in this permit. [OAR 340-226-0120(2)(d)]
36. For each temperature monitor, the permittee must meet the quality control requirements listed in Conditions

36.a through 36.c. [OAR 340-212-0210]

- 36.a. The permittee must verify calibration of the temperature monitor by using a calibrated probe semi-annually for each scrubber and/or RTO. Temperature variation of +/-30 degrees Fahrenheit is allowed. A larger discrepancy between the calibrated probe and the scrubber temperature monitor requires corrective action. Corrective action can include re-calibration or replacement of the temperature monitor.
- 36.b. Except for system breakdowns, out-of-control periods, repairs, maintenance periods, calibration checks, and zero (low-level) and high-level calibration drift adjustments, the temperature monitor must be in continuous operation.
- 36.c. Records must be maintained of all temperature monitor breakdowns, repairs, calibrations, and corrective action.

### Emissions Testing

37. Emissions units Dryers VD-A, VD-B and VD-C shall have the dryer emissions through the RTO tested once during this permit term, conducted within 180 days of permit issuance unless the conversion to an RCO happens before the end of the 180 day period. When the RTO is converted to an RCO by addition of catalyst, a source test must be conducted within 180 days of start of operation. All emission testing must be performed in accordance with a DEQ approved source test plan. [OAR 340-218-0050(3)(a)(C)]

- 37.a. Unless otherwise specified by permit condition or DEQ approved source test plan, Dryers VD-A, VD-B and VD-C and RTO compliance source tests must be performed according to Condition 56.
- 37.b. Testing must consist of a minimum of three (3) 1-hour test runs [except for opacity (three 6-minute test runs)] for flow, particulate matter (PM), nitrogen oxides (NO<sub>x</sub>), carbon monoxide (CO), opacity, volatile organic compounds emissions from the emissions unit Dryers A, B and C at the exhaust stack of the RTO/RCO. Emission tests will be performed simultaneously on the RTO/RCO inlet stream to determine VOC emissions (including formaldehyde and methanol). The RTO/RCO's VOC destruction and removal efficiency (DRE) will be reported based on the RTO/RCO inlet and outlet VOC emission data.

37.b.i. The following test methods must be used unless DEQ approves another test method:

Location: RTO/RCO Exhaust Duct

PM	ODEQ Method 5
NO <sub>x</sub>	EPA Method 7E
CO	EPA Method 10
Opacity	EPA Method 9
VOC	EPA Method 25A

Location: RTO/RCO Inlet Duct

Flow	EPA Methods 1-4
VOCs	EPA Method 25A
Methanol and formaldehyde	NCASI Method 98.01 (or equivalent)

- 37.c. Report test results for NO<sub>x</sub> and CO, as ppmvd, pounds per hour, and pounds per 1000 square feet on a 3/8 inch basis (lb/1000 ft<sup>2</sup> 3/8" basis).
- 37.d. Particulate matter (PM) test results shall be reported as grains per dry standard cubic foot (gr/dscf), pounds per hour (lb/hr), and pounds per 1000 square feet on a 3/8 inch basis (lb/1000 ft<sup>2</sup> 3/8" basis).
- 37.e. VOC (non-methane hydrocarbon) test results will be reported on an "as VOC basis" in accordance with DEQ Guidance Document P-8-20-100. Report test results as propane in ppmvd, pounds per hour, and pounds per 1000 ft<sup>2</sup> on a 3/8 inch basis of veneer dried. VOC

destruction efficiency shall be calculated from the inlet and outlet VOC test results.

37.f. Perform each test while drying the most representative species of wood.

37.g. During each test run, the permittee shall record the following information:

- 37.g.i. species of veneer dried;
- 37.g.ii. amount of veneer dried (1000 ft<sup>2</sup>/hr on a 3/8" basis);
- 37.g.iii. amount of redry (%);
- 37.g.iv. visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each particulate test run, unless weather conditions are such that it is not possible to read opacity;
- 37.g.v. dryer conditions including dryer temperatures by zone (°F);
- 37.g.vi. drying time (minutes); and
- 37.g.vii. RTO/RCO combustion chamber temperatures (°F)
- 37.g.viii. Amount of propane burned.

#### PLYWOOD PRESSES (Presses 1, 2, 3, and 4)

Table 5 - Summary of Requirements for Emissions Units Presses 1, 2, 3, and 4

Applicable Requirement	Requirement Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition Number
340-208-0110(4)	38.a	Visible emissions from Press 1, 3, & 4	20% opacity as 6-minute block average	VE	40
340-208-0110(3)(a)	38.b	Visible emissions from Press 2	40% opacity as 6 min. block avg. until December 31, 2019; 20% opacity on or after January 1, 2020	VE	40
340-226-0210(2)(c)	39.a	PM	0.10 gr/dscf (avg. of 3 test runs) for Press 4	VE, ST	40, 41
340-226-0210(2)(b)(B)	39.b	PM	0.14 gr/dscf (avg. of 3 test runs) for Press 1 and 3	VE, ST	40, 41
340-226-0210(2)(a)(B)	39.c	PM	0.24 gr/dscf through 12/31/19, then 0.15 gr/dscf (avg. of 3 test runs) for Press 2	VE, ST	40, 41

#### Visible Emission Standards for Presses 1, 2, 3, and 4

38. Applicable Requirements: The permittee must not cause or allow:

- 38.a. Emissions of any air contaminant into the atmosphere from Press 1, 3 and 4, which is equal to or greater than 20% opacity. [OAR 340-208-0110(4)]
- 38.b. Emissions of any air contaminant into the atmosphere from Press 2, which is equal to or greater than 40% average opacity as a 6-minute block through December 31, 2019. On and after January 1, 2020 the average opacity is limited to 20%. [OAR 340-208-0110(3)(a)]
- 38.c. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 38.c.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block

average is calculated by summing the opacity of the 24 observations and dividing the sum by

24. Six-minute block averages are measured by: [OAR 340-208-0110(2)]

- 38.c.i. EPA Method 9; or
- 38.c.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
- 38.c.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.

#### **Particulate Matter Standards for Presses 1, 2, 3, and 4**

39. The permittee must not cause or allow the emissions of particulate matter in excess of the following limits for EU Presses:

- 39.a. For Press 4, the emission limit is 0.10 gr/dscf. [OAR 340-226-0210(2)(c)]
- 39.b. For Presses 1 and 3, the emission limit is 0.14 gr/dscf. [OAR 340-226-0210(2)(b)(B)]
- 39.c. For Press 2, the emission limit is 0.24 gr/dscf prior to Dec. 31, 2019, then 0.15 gr/dscf on or after Jan. 1, 2020. [OAR 340-226-0210(2)(a)(B)]

40. Monitoring Requirement: The permittee must monitor visible emissions from the press vents in accordance with the following procedures, test methods and frequencies:

- 40.a. EPA Method 9 must be used to determine opacity in accordance with DEQ's Source Sampling Manual.
- 40.b. Visible emissions testing, using EPA Method 9 may be waived provided both of the following conditions are met:
  - 40.b.i. The permittee must conduct a six (6) minute visible emission survey of each emission unit using EPA Method 22.
  - 40.b.ii. If visible emissions, excluding condensed water vapor, from an individual monitoring point are detected more than 5% (18 seconds) of the survey time, EPA Method 9 must be conducted on that monitoring point in accordance with Condition 40.a within 24 hours.
- 40.c. Visible emission tests must be conducted on the frequency described in Condition 57.
- 40.d. If, on a regularly scheduled test day, it is not possible to conduct a Method 9 test due to inclement weather conditions or interference from other sources, the permittee must note such conditions on the observation data sheet and must conduct the required emission monitoring as soon as practicable after the regularly scheduled test day, while maintaining the 30-day period between quarterly readings as indicated in Condition 40.a. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day.
- 40.e. If any test, completed on a regularly scheduled test day, shows a violation of the applicable limits in Condition 38 the permittee must:
  - 40.e.i. Take corrective action to remedy the violation within 30 minutes; and
  - 40.e.ii. Perform daily tests until at least 5 consecutive days show emissions below the limits. After the 5-day period, the test frequency must be quarterly.
- 40.f. All EPA Method 9 tests and surveys must be performed during periods that the emissions devices are in operation.

#### **Emissions Testing**

41. Emissions unit Presses shall have the press emissions from any one press tested once during this permit



term. All emission testing must be performed in accordance with a DEQ approved source test plan. [OAR 340-218-0050(3)(a)(C)]

- 41.a. Unless otherwise specified by permit condition or DEQ approved source test plan, Press compliance source tests must be performed according to Condition 56.
- 41.b. The press must meet the EPA method 204 requirements for a permanent total enclosure (PTE) or have a temporary total enclosure (TTE) constructed to meet the requirements of Method 204 for the duration of the testing.
- 41.c. Testing must consist of a minimum of three (3) 1-hour test runs [except for opacity (three 6-minute test runs)] for flow, particulate matter (PM), opacity, volatile organic compounds, methanol and formaldehyde emissions from the emissions unit Presses at the exhaust stack of any one press.

41.c.i. The following test methods must be used unless DEQ approves another test method:

Location: Press Exhaust Duct

Stack Flow and conditions	EPA Methods 1-4
PM	ODEQ Method 5
Opacity	EPA Method 9
VOC	EPA Method 25A
Formaldehyde and Methanol	NCASI Method 98.01
TTE	EPA Method 204

- 41.d. Particulate matter (PM) test results shall be reported as grains per dry standard cubic foot (gr/dscf), pounds per hour (lb/hr), and pounds per 1000 square feet on a 3/8 inch basis (lb/1000 ft<sup>2</sup> 3/8" basis).
- 41.e. VOC (non-methane hydrocarbon) test results will be reported on an "as VOC basis" in accordance with DEQ Guidance Document P-8-20-100, and methanol and formaldehyde test results will be reported as species. Report test results as propane in ppmvd, pounds per hour, and pounds per 1000 ft<sup>2</sup> on a 3/8 inch basis of plywood pressed. These tests will be used for emission factor verification purposes, not compliance testing.
- 41.f. Perform each test while pressing the most representative species of wood.
- 41.g. During each test run, the permittee shall record the following information:
  - 41.g.i. species of veneer pressed;
  - 41.g.ii. amount of plywood pressed (1000 ft<sup>2</sup>/hr on a 3/8" basis);
  - 41.g.iii. visible emissions as measured in accordance with EPA Method 9 within 30 minutes before, during, or within 30 minutes after each particulate test run, unless weather conditions are such that it is not possible to read opacity;
  - 41.g.iv. press conditions including press temperature and pressure;
  - 41.g.v. pressing time (minutes); and
  - 41.g.vi. plywood adhesive used (gallons).

## MATERIAL TRANSPORT (MT) AND PNEUMATIC CONVEYORS (CON)

Table 6 - Summary of Requirements for Emission Unit MT & CON

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3) & (4)	42	Visible emissions	20% opacity or 40% opacity thru 12/31/19,	6-minute block average	NA	45

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
			then 20% opacity			
340-226-0210(1)(b)	43	PM	0.10- 0.24 gr/dscf, see condition	Avg. of 3 test runs	NA	46, 47
340-226-0310	44	PM	See Table 1	Avg. of 3 test runs	NA	46, 47

### Visible Emission Standards for MT & CON

42. Applicable Requirement: The permittee must comply with the following visible emission limits for all cyclone and baghouse exhausts from EU MT and CON. Visible emissions may not equal or exceed: [OAR 340-208-0110(3) & (4)]
- 42.a. An average of 20% opacity for equipment installed, constructed or modified after June 1, 1970;
  - 42.b. An average of 40% opacity through 12/31/2019 then an average of 20% opacity on and after 1/1/2020, for equipment installed, constructed or modified prior to June 1, 1970.
  - 42.c. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, or more frequently as allowed under Condition 42.c.ii, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by: [OAR 340-208-0110(2)]
    - 42.c.i. EPA Method 9; or
    - 42.c.ii. A continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR part 60; or
    - 42.c.iii. An alternative monitoring method approved by DEQ that is equivalent to EPA Method 9.

### Particulate Matter Standards for MT

43. Applicable Requirement: The permittee must not cause or allow the emissions of particulate matter in excess of the following limits from all cyclones and baghouses in EU MT and CON:
- 43.a. For equipment installed, constructed or modified prior to June 1, 1970, 0.24 gr/dscf until Dec. 31, 2019, then 0.15 gr/dscf on and after Jan. 1, 2020. [OAR 340-226-0210(2)(a)(B)]
  - 43.b. For equipment installed, constructed or modified after June 1, 1970 but prior to April 16, 2015, 0.14 gr/dscf [OAR 340-226-0210(2)(b)(B)]
  - 43.c. For equipment installed, constructed, or modified after April 16, 2015, 0.10 gr/dscf [OAR 340-226-0210(2)(c)]
44. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter in any one hour from process equipment in EU MT and CON in excess of the amount shown in Table 1, OAR 340-226-0310, for the process weight allocated to that process. [OAR 340-226-0310]
45. Monitoring and Recordkeeping Requirements: At least once per calendar quarter, the permittee must conduct an EPA Method 9 visible emissions test at the outlet of each cyclone and baghouse in EU MT and CON. [OAR 340-218-0050(3)(a)(C)]
- 45.a. The EPA Method 9 test method may be waived provided the permittee conducts a 6 minute visible emissions survey on the device at the compliance demonstration points using EPA Method 22 and visible emissions, excluding water vapor, are not detected for more than 5% (18 seconds) of the survey time.

- 45.b. If the observer is unable to conduct the tests and/or surveys due to visual interference caused by other visible emission sources or due to adverse weather conditions such as fog, heavy rain, or snow, the observer must note such conditions on the observation form and make at least three attempts to conduct the tests and/or surveys at approximately 2-hour intervals throughout the day during daylight hours. The permittee must attempt to make the tests daily until a valid observation period is completed. The visible emissions test and/or survey requirement is waived for any source in the EU MT and CON if that source is shutdown for a period exceeding the quarterly monitoring period.
- 45.c. All visible emissions test and surveys shall be conducted during operating conditions that have the potential to create visible emissions (e.g. during loading and/or unloading activities).
- 45.d. Recordkeeping: The permittee must maintain records of all visible emissions tests and surveys, including date, time, observer, observations, results, and any corrective actions taken.
46. Monitoring and Recordkeeping Requirement: The permittee shall conduct an inspection and maintenance program to keep the air pollution control systems of EU MT and CON in proper operating condition by conducting quarterly external inspections of all cyclones and associated ductwork for structural integrity, corrosion, and air leaks. The permittee shall maintain records of all inspections and any corrective actions taken. [OAR 340-218-0050(3)(a)(C)]
47. Monitoring and Recordkeeping Requirements: At least once per month, the permittee must conduct external inspections of all baghouses, cyclones, blowpipes, and duct work for structural integrity, corrosion, and air leaks. [OAR 340-218-0050(3)(a)(C)]
- 47.a. Recordkeeping: Records must be maintained of all inspections, results, and corrective actions taken.

#### Plant Traffic - Unpaved Roads (WE)

**Table 8 - Summary of Requirements for WE**

Applicable Requirement	Condition Number	Pollutant/ Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition Number
OAR 340-208-0450	48	PM >250 $\mu$	No Particle fallout	Complaint investigation	49

#### Visible Emission Standards for WE

48. Applicable Requirement: The permittee must not cause or permit the deposition 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. [OAR 340-208-0450] *This condition is enforceable only by the State.*
49. Monitoring Requirement: The permittee must investigate fugitive emissions complaints in accordance with the requirements of Condition 8. No other visible emission monitoring is required for EU WE.

#### Insignificant Activities Emission Limits and Standards

50. DEQ acknowledges that insignificant emissions units (IEUs) identified by rule as either categorically insignificant activities or aggregate insignificant emissions as defined in OAR 340-200-0020 exist at facilities required to obtain an Oregon Title V Operating Permit. IEUs must comply with all applicable requirements. In general, the requirements that could apply to IEUs are incorporated as follows:
- 50.a. OAR 340-208-0110 (20% opacity)
- 50.b. OAR 340-228-0210 (0.14 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning)

- equipment installed constructed or modified on or after June 1, 1970 but prior to April 15, 2015)
- 50.c. OAR 340-228-0210 (0.10 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning equipment installed constructed or modified after April 15, 2015)
- 50.d. OAR 340-226-0210 (0.14 gr/dscf for non-fugitive, non-fuel burning equipment installed constructed or modified on or after June 1, 1970 but prior to April 15, 2015)
- 50.e. OAR 340-226-0210 (0.10 gr/dscf for non-fugitive, non-fuel burning equipment installed constructed or modified after April 15, 2015)
- 50.f. OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment).
- 50.g. The permittee must not allow gasoline to be handled in a manner that would result in vapor releases to the atmosphere for extended periods of time. Measures to be taken include, but are not limited to the following: [OAR 340-224-0240]
- 50.g.i. Minimize gasoline spills;
  - 50.g.ii. Clean up spills as expeditiously as practicable;
  - 50.g.iii. Cover all open gasoline containers and all gasoline storage tank fill-pipes with a gasketed seal when not in use;
  - 50.g.iv. Minimize gasoline sent to open waste collection systems that collect and transport gasoline to reclamation and recycling devices, such as oil/water separators.
  - 50.g.v. The permittee is not required to submit the notifications or reports as specified in OAR 340-244-0246, but the permittee must have records available within 24 hours of a request by DEQ to document gasoline throughput.
  - 50.g.vi. Portable gasoline containers that meet the requirements of 40 CFR Part 59, Subpart F, are considered acceptable for compliance with Condition 50.g.iii.
- 50.h. In addition to the measures specified in Condition 50.g, the permittee must take the following measure to minimize vapor releases: [OAR 340-244-0240, state only enforceable]
- 50.h.i. Do not top off or overfill vehicle tanks. If a person can confirm that a vehicle tank is not full after the nozzle clicks off (such as by checking the vehicle's fuel tank gauge), the person may continue to dispense fuel using best judgment and caution to prevent a spill;
  - 50.h.ii. Post a sign at the gasoline dispensing facility (GDF) instructing a person filling up a motor vehicle to not top off the vehicle tank;
  - 50.h.iii. Ensure that cargo tanks unloading at the GDF comply with Conditions 50.g.ii through 50.g.iv and 50.h.i and 50.h.ii.
  - 50.h.iv. The permittee must only load gasoline into storage tanks at the facility by utilizing submerged filling, as defined in OAR 340-244-0030. Submerged fill pipes installed after 11/9/06 must be no more than 6 inches from the bottom of the storage tank. Submerged fill pipes installed on or before 11/9/06 must be no more than 12 inches from the bottom of the storage tank
- 50.i. Emergency stationary reciprocating internal combustion engines (RICE) are subject to the following requirements: [40 63.6640(f)]
- 50.i.i. For each emergency stationary RICE, the permittee must:
    - 50.i.i.A. Change oil and filter every 500 hours of operation or annually, whichever comes first; [40 CFR 63. 6603(a), table 2d(4)(a)]
    - 50.i.i.B. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; [40 CFR 63. 6603(a), table 2d(4)(b)]
    - 50.i.i.C. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; [40 CFR 63. 6603(a), table 2d(4)(c)]
    - 50.i.i.D. During periods of startup, minimize the engine's time spent at idle and minimize the engine's startup time at startup to a period needed for appropriate and safe loading of the engine, not to exceed 30 minutes, after which time the non-startup emission limitations apply; and [40 CFR 63. 6603(a), table 2d]
  - 50.i.ii. The permittee must install a non-resettable hour meter on each emergency stationary RICE, if one is not already installed. [40 CFR 63.6625(f)]

- 50.i.iii. The permittee must operate and maintain the stationary RICE according to the manufacturer's emission related operation and maintenance instructions [40 CFR 63.6640(a), Table 6(9)]
- 50.i.iv. Operating conditions: [40 CFR 63.6640(f)(2)]
  - 50.i.iv.A. There is no time limit on the use of emergency stationary RICE in emergency situations.
  - 50.i.iv.B. Emergency stationary RICE may be operated for the purpose of maintenance checks and readiness testing, provided that the tests are recommended by the manufacturer, the vendor, or the insurance company associated with the engine. Required testing of such units should be minimized, but there is no time limit on the use of emergency stationary RICE in emergency situations and for routine testing and maintenance.
  - 50.i.iv.C. Emergency stationary RICE may be operated for an additional 50 hours per year in non-emergency situations. The 50 hours per year for non-emergency situations cannot be used for peak shaving or to generate income for a facility to supply power to an electric grid or otherwise supply power as part of a financial arrangement with another utility.
- 50.i.v. The permittee must keep records of the hours of operation of each emergency stationary RICE that is recorded through the non-resettable hour meter. The permittee must document how many hours are spent for emergency operation, including what classified the operation as emergency and how many hours are spent for non-emergency operation. If the engines are used for demand response operation, the permittee must keep records of the notification of the emergency situation, and the time the engine was operated as part of demand response. [40 CFR 63.6655(f)]

51. Unless otherwise specified in this permit, the Department 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 and perform the testing in accordance with the DEQ's Source Sampling Manual.

#### PLANT SITE EMISSION LIMITS

52. The permittee must not cause or allow plant site emissions to exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0035 through OAR 340-222-0041]

Pollutant	Plant Site Emission Limit (tons/yr)	Unassigned Emissions (tons/yr)
PM	158	81
PM <sub>10</sub>	132	73
PM <sub>2.5</sub>	106	29
CO	193	23
NO <sub>x</sub>	102	0
SO <sub>2</sub>	39**	0
VOC	107	0
HAPs (single/combined)*	9/24	0
GHG	80,900	0

\* Maximum of 9 tons/year of a single HAP and 24 tons/year of all combined HAPs

\*\* SO<sub>2</sub> is given at the generic level (calculated actual emissions are at 3 tons/year)

53. 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 DEQ. [OAR 340-222-055]

#### Plant Site Emissions Monitoring

54. The permittee must determine compliance with the Plant Site Emission Limits established in Conditions 52 of this permit by conducting monitoring and calculations for each 12-month period in accordance with the following procedures, test methods, and frequencies, except for GHGs. [OAR 340-218-0050(3)]

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

**Table 9. PSEL Monitoring**

Emissions unit(s)	Process parameter and units	Pollutant(s)	Measurement Technique	Measurement Frequency
PH2	Steam production: steam produced by boilers (1000 lbs)	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , CO, NO <sub>x</sub> , SO <sub>2</sub> , and VOC	Steam flow meter	Monthly total
Dryers	Actual veneer dried by species and/or type (e.g.; Douglas Fir, White Fir, redry) (MSF - 3/8" basis)	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC	Production records	Monthly total
Presses	Actual plywood pressed (MSF - 3/8" basis)	PM, PM <sub>10</sub> , PM <sub>2.5</sub> , VOC	Production records	Monthly total
MT	Material received, burned and handled (BDT)	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Production records	Monthly total
CON, WE	Final plywood production (MSF/day - 3/8" basis), hours of operation for each baghouse.	PM, PM <sub>10</sub> , PM <sub>2.5</sub>	Production records	Daily & Monthly totals
Glue Mixer	Total amounts of adhesives and chemicals purchased	VOC	Purchasing records	Monthly total

54.b. Emission factors for calculating pollutant emissions:

**Table 10. Emission Factors and Verification Testing**

Emissions unit(s)	Pollutant	Fuels/ species/ conditions	Emission factor	Units
PH2	PM	Wood fuel	0.2	lb/Mlb of steam
	PM <sub>10</sub>	Wood fuel	0.198	lb/Mlb of steam

Emissions unit(s)	Pollutant	Fuels/ species/ conditions	Emission factor	Units
	PM <sub>2.5</sub>	Wood Fuel	0.18	lb/Mlb of steam
	CO	Wood fuel	0.803	lb/Mlb of steam
	NO <sub>x</sub>	Wood fuel	0.453	lb/Mlb of steam
	SO <sub>2</sub>	Wood fuel	0.015	lb/Mlb of steam
	VOC	Wood fuel	0.13	lb/Mlb of steam
Presses	PM/PM <sub>10</sub> /PM <sub>2.5</sub>		0.203/0.173/0.086	lb/MSF plywood
	VOC		0.25	lb/MSF plywood
CON : BH1 BH2 BH3 BH4 Glue mixer	PM/PM <sub>10</sub> /PM <sub>2.5</sub>		0.55/0.55/0.54 0.79/0.79/0.78 0.19/0.189/0.188 0.86/0.86/0.85 1.3/1.3/0.65	lb/hr lb/hr lb/hr lb/hr lb/hr
Dryers/RTO	PM/PM <sub>10</sub> /PM <sub>2.5</sub>	Douglas Fir	0.176/0.176/0.176	lb/MSF, 3/8"
	VOC	Douglas Fir	0.170	lb/MSF, 3/8"
	CO	propane	0.119	lb/MSF, 3/8"
	NO <sub>x</sub>	propane	0.014	lb/MSF, 3/8"
Dryers – Cooling Zones	VOC	Douglas Fir	0.084	lb/MSF, 3/8"
MT: HF truck unloading HF front loader  HF Pile conveyor  HF Feed conveyor	PM/PM <sub>10</sub> /PM <sub>2.5</sub>		0.5/0.375/0.25  0.5/0.375/0.25  0.2/0.0.15/0.1  0.2/0.0.15/0.1	lb/BDT

Emissions unit(s)	Pollutant	Fuels/ species/ conditions	Emission factor	Units
MT: Sanderdust screen Sawdust truck loading Plytrim truck loading Sanderdust truck loading	PM/PM <sub>10</sub> / PM <sub>2.5</sub>		2.0/1.5/1.0  2.0/1.5/1.0  0.5/0.375/0.25  2.0/1.5/1.0	lb/BDT
WE	PM/PM <sub>10</sub> / PM <sub>2.5</sub>	Unpaved	0.1/0.03/0.01	lb/MSF, 3/8"

- 54.c. The permittee must calculate emissions for each 12 consecutive calendar month period by the end of the following month using the following equation for all pollutants except GHGs:.

$$E = (\sum(P_{eu} \times EF_{eu}) \times K + MB + 1 \text{ ton/yr (Agg. Insign)}).$$

where:

E = Pollutant emissions in lbs/month and tons/yr.  
P<sub>eu</sub> = Process parameter identified in Table 9 above;  
EF<sub>eu</sub> = Emission factor identified for each emissions unit and pollutant in Table 10 above;  
MB = VOC mass balance emissions for Facility VOC per Condition 54.d  
K = Conversion constant: 1 lb/lb for monthly emissions calculations; 1 ton/2,000 lbs for annual emissions calculations.

- 54.d. The permittee must calculate VOC mass balance emissions for Emission Units Facility VOC as follows:

$$MB = [\sum(C_x \cdot D_x \cdot K_x) - W] \cdot Z$$

Where

MB = VOC emissions (lbs/month or tons/yr)  
C = Material usage for the period in gallons  
D = Material density in pounds per gallon  
K = VOC Concentration expressed as a decimal fraction  
X = subscript X represents a specific material  
W = weight of VOC shipped offsite as hazardous or non-hazardous waste or in wastewater  
Z = conversion constant (1 ton/2000 lbs.)

As an alternative to D and K above, the permittee may use the VOC concentration given in pounds per gallon in the calculation.

- 54.e. The emission factors listed in Condition 54.b are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs must only be determined by calculating emissions using monitored parameter data and emission factors specified in Condition 54.c.



- 54.f. The permittee shall conduct emission factor verification tests in accordance with DEQ's Source Sampling Manual for PM, CO, NO<sub>x</sub> and VOC emission factors listed for emissions units PH2 and Dryers/RTO using the test method specified under each emission unit.
- 54.f.i. The testing required in Conditions 19 and 37 may be used to satisfy this requirement in full or in part.

#### EMISSION FEES

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

#### GENERAL TESTING REQUIREMENTS

- 56. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120]
  - 56.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to DEQ at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. Permittee should be aware, if significant variations are requested, it may require more than 30 days for DEQ to grant approval and may require EPA approval in addition to approval by DEQ.
  - 56.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.
  - 56.c. Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:
    - 56.c.i. At least 90% of the design capacity for new or modified equipment;
    - 56.c.ii. At least 90% of the maximum operating rate for existing equipment; or
    - 56.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.
  - 56.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, DEQ may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
  - 56.e. Source test reports prepared in accordance with DEQ's Source Sampling Manual must be submitted to DEQ within 60 days of completing any required source test, unless a different time period is approved in the source test plan submitted prior to the source test.

#### Visible Emissions Units Monitoring

- 57. The permittee shall monitor visible emissions from emissions units PH2, Dryers, Presses, and CON in

accordance with the following procedures, test methods, and frequencies:

- 57.a. EPA Method 9 shall be used to determine opacity for the emissions unit Dryers.
- 57.b. EPA Method 9 shall be used to determine opacity for the emissions units PH2 and CON. For EPA Method 9, each observation period shall be a minimum of six (6) minutes unless any one reading is greater than the emissions limit for the emissions unit, then the observation period shall be a minimum of 60 minutes or until a violation of the emissions standard has been documented; whichever is a shorter period.
- 57.c. Visible emissions testing, using EPA Method 9, may be waived for emission units Presses and CON provided both of the following conditions are met:
  - 57.c.i. The permittee conducts a six (6) minute visible emissions survey of each emissions unit using EPA Method 22; and,
  - 57.c.ii. Visible emissions, excluding condensed water vapor, from an individual monitoring point are not detected for more than 5% (18 seconds) of the survey time.
- 57.d. The permittee shall follow the existing monitoring schedule for conducting the visible emissions tests and /or surveys as required below (continue with schedule from previous permit):
  - 57.d.i. The initial monitoring frequency for performing visible emission test and/or surveys in the previous permit was:

Emission Unit	Frequency
PH2, Dryers-1	Weekly
Presses and CON	Monthly

- 57.d.ii. The existing schedule, based on the initial monitoring schedule above, with any adjustments listed below, shall continue to apply.
- 57.d.iii. If 6 consecutive weeks of visible emission surveys and/or EPA Method 9 tests conducted on emissions units PH2 and Dryers, show opacity to be within the applicable limits specified in Conditions 12 and 26, the surveys and/or EPA Method 9 tests need only be performed once per month for corresponding emissions units.
- 57.d.iv. If 3 consecutive months of visible emission surveys and/or EPA Method 9 tests conducted on the emissions unit Dryers, show opacity within the applicable limits specified in Conditions 12 and 26, the EPA Method 9 tests and/or surveys need only be done once per quarter. If 3 consecutive months of visible emission surveys and/or EPA Method 9 tests conducted on the emissions units Presses and CON show opacity to be within the applicable limits specified in Conditions 38.a, 38.b, and, the EPA Method 9 tests and/or surveys need only be done once per quarter.
- 57.d.v. If a test exceeds the standard in Conditions 12, 26, 38.a, or 38.b, for emissions units PH2, Dryers, Presses or CON, the frequency shall be daily for the emissions units for 5 consecutive days following the exceedance. If the results of daily tests are all less than the applicable standards, the test frequency shall be the same as before the exceedance occurred.

- 57.e. All visible emissions tests and surveys shall be conducted during operating conditions that have the potential to create visible emissions (e.g., material processed through baghouses).
- 57.f. If the observer is unable to conduct the survey and/or test due to visual interference caused by other visible emissions sources (e.g., fugitive emissions during high wind conditions) or due to weather conditions such as fog or heavy rain, the observer shall note such conditions on the data observation sheet and make at least three attempts to conduct the surveys and/or tests at approximately 2 hour intervals throughout the day. The permittee shall attempt to observe daily until a valid observation period is completed.
- 57.g. The permittee shall maintain records of all surveys, tests, and corrective actions taken.

## GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

### General Monitoring Requirements

- 58. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
- 59. The permittee must use the same methods to determine compliance as those used to determine actual emissions for fee purposes and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
- 60. The permittee must comply with the monitoring requirements 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

- 61. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
  - 61.a. The date, place as defined in the permit, and time of sampling or measurements;
  - 61.b. The date(s) analyses were performed;
  - 61.c. The company or entity that performed the analyses;
  - 61.d. The analytical techniques or methods used;
  - 61.e. The results of such analyses;
  - 61.f. The operating conditions as existing at the time of sampling or measurement;
  - 61.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, and calibration drift checks); and
- 62. 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 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. [OAR 340-214-0110, 340-214-0114, and 340-218-0050(3)(b)]

### Source Specific Recordkeeping Requirements

- 63. Source specific recordkeeping requirements:

- 63.a. The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any EPA Method 9 tests.
- 63.b. Type and amount of fuels used;
- 63.c. Monthly and annual records of press production - 3/8 inch basis;
- 63.d. Monthly and annual records of gross veneer dried - 3/8 inch basis;
- 63.e. Weekly facility fugitive emissions inspection, maintenance, and corrective action log;
- 63.f. Fugitive dust inspection and maintenance activities including the weekly fugitive emissions survey results and actions taken, quarterly inspection results of all transfer points and conveyor systems and actions taken, as needed treating and/or cleaning of travel vehicular areas, incidents (on occurrence) of spillage from conveyor upsets and/or plugged cyclones and action taken;
- 63.g. Visible emissions tests and surveys;
- 63.h. Inspection and maintenance activities on pollution control devices (RTO/RCO, multiclones, wet scrubbers, and ionizing wet scrubbers);
- 63.i. PH2 excess oxygen as 3-hour averages;
- 63.j. PH2 oxygen action level excursions;
- 63.k. PH2 corrective action log;
- 63.l. PH2 inspection log;
- 63.m. PH2 biennial tune-ups
- 63.n. PH2 (WS1 and WS2) (hourly), temperature and corrective action taken, if the outlet temperatures are above the action value;
- 63.o. RTO/RCO 3 hr. temp. avgs.
- 63.p. Veneer dryers fugitive emissions inspections, maintenance, and corrective actions taken;
- 63.q. Monthly and annual PH2 steam production;
- 63.r. Monthly and annual hours of operation of PH2;
- 63.s. Daily and annual Dryers throughput by type and species (MSF - 3/8" basis);
- 63.t. Monthly and annual press throughput (MSF -- 3/8" basis);
- 63.u. Monthly and annual VOC material usage and mass balance calculations, minus resin use in plywood production
- 63.v. Excess emissions log;

- 63.w. Monthly external inspection and corrective actions taken on CON devices; and
- 63.x. Any required short term and annual facility-wide emissions.
- 64. The permittee must comply with the recordkeeping requirements on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
- 65. 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 Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report, or application. [OAR 340-218-0050(b)(B)]

## REPORTING REQUIREMENTS

### General Reporting Requirements

- 66. Excess Emissions Reporting The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]
  - 66.a. Immediately (by 9:00 AM the next business day) notify DEQ of an excess emission event by phone, email, or facsimile; and
  - 66.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]
    - 66.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;
    - 66.b.ii. The date and time the permittee notified DEQ of the event;
    - 66.b.iii. The equipment involved;
    - 66.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction, or emergency;
    - 66.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown, or maintenance activity were followed;
    - 66.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
    - 66.b.vii. The final resolution of the cause of the excess emissions; and
    - 66.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.
  - 66.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 DEQ by calling the Oregon Accident Response System (OARS). The current number is 1-800-452-0311.
  - 66.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 DEQ for prior authorization, as required in OAR 340-214-0310 and 340-214-

0320. New or modified procedures must be received by DEQ 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.

- 66.e. The permittee must continue to maintain a log of all excess emissions in accordance with OAR 340-214-0340(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)]
67. 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 OAR 340-214-0300 through 340-214-0360 must be reported in accordance with Condition 66.
68. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
69. 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 regulatory agencies are the following, unless otherwise instructed:

Submit all Notices and applications that do not include payment to the 's Permit Coordinator.

Submit all reports (annual reports, source test plans and reports, etc.) to DEQ's Western Region. If you know the name of the Air Quality staff member responsible for your permit, please include it.

DEQ – Western Region  
4026 Fairview Industrial Way SE  
Salem, OR 97302  
503-378-8240

Submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:

DEQ – Air Quality Division  
700 NE Multnomah Street  
Suite 600  
Portland, OR 97232  
(503) 229-5696

Submit all reports for EPA requirements to:

Air Operating Permits  
US Environmental Protection Agency  
Mail Stop OAQ-108  
1200 Sixth Avenue  
Seattle, WA 98101

#### **Semi-annual and Annual Reports**

70. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by DEQ. Six month periods are January 1 to June 30, and July 1 to December 31. One paper copy of the report must be submitted to the EPA and two copies (one paper copy and one electronic copy) to the DEQ regional office. 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)]
- 70.a. The first semi-annual report is due on July 30 and must include the semi-annual compliance certification, OAR 340-218-0080.

- 70.b. The annual report is due on February 15 and must consist of the following:
  - 70.b.i. The emission fee report; [OAR 340-220-0100]
  - 70.b.ii. The NO<sub>x</sub> and VOC emission statement, if applicable; [OAR 340-214-0220]
  - 70.b.iii. A summary of the excess emissions upset log; [OAR 340-214-0340]
  - 70.b.iv. The second semi-annual compliance certification; [OAR 340-218-0080]
  - 70.b.v. Recordkeeping requirements listed in Condition 63;
  - 70.b.vi. The annual emission inventory report for the prior calendar year; and (Form R1001). [OAR 340-214-0220]
71. 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)]
  - 71.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 71.b. The identification of the method(s) or other means used by the permittee 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 into the permit. When certifying compliance with new applicable requirements that are not yet in the permit, the permittee must provide the information required by this condition.* If necessary, the permittee 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;
  - 71.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 71.b of this rule. 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 OAR 340-200-0020, occurred; and
  - 71.d. Such other facts as DEQ may require to determine the compliance status of the source.
72. Greenhouse Gas Registration and Reporting: If the calendar year emission rate of greenhouse gases (CO<sub>2</sub>e) is greater than or equal to 2,756 tons (2,500 metric tons), the permittee must register and report its greenhouse gas emissions with DEQ in accordance with OAR 340-215. The greenhouse gas report must be certified by the responsible official consistent with OAR 340-218-0040(5).
73. Notwithstanding any other provision contained in any applicable requirement, the permittee may use monitoring as required under OAR 340-218-0050(3) and incorporated into the permit, in addition to any specified compliance methods, for the purpose of submitting compliance certifications. [OAR 340-218-0080(6)(e)]

## NON-APPLICABLE REQUIREMENTS

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

Rule	Reason Code
<b>OAR Chapter 340:</b>	
Division 206	
0050	c
Division 208	
0510 - 0610	d
Division 210:	
0120	b
Division 214:	
0210 - 0220	c
Division 216:	
0054 -0070	j
0094	b
Division 222:	
0060	b
Division 224:	
0025-0040	g
0045-0060	c
0070	c
0245-0260	c
0500-0520	g

Rule	Reason Code
Division 225:	
0045	c
Division 226:	
0130	g
0400	h
Division 228:	
0120	f
0200	f
0300	b
Division 230	e
Division 232	c
Division 234:	
0100	e
0140	e
0210 through 0270	e
0520	b
0530	B
Division 236	b

Rule	Reason Code
Division 238:	
0060-0080	b
0090	d
0100	b
Division 240	c
Division 242	c
Division 244:	
0200	b
0232-0250	b
Division 248:	
0110-0180	h
0210-0230	b
0250-0290	b
Division 256	b
Division 258	e
Division 260	e
Division 264:	
0010-0080	e
0110-0175	d
0180	h

## Reason code definitions:

- a this pollutant is not emitted by the facility
- b the facility is not in this source category
- c the facility is not in a special control area
- d the facility is not in this county
- e the facility does not have this emissions unit
- f the facility does not use this fuel type
- g the rule does not apply because no changes have been made at the facility that would trigger these procedural requirements
- h this method/procedure is not used by the facility
- i this rule applies only to DEQ and regional authorities
- j other (explained below)

Other:



## GENERAL CONDITIONS

### G1. General Provision

Terms not otherwise defined in this permit 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 this permit:

- a. Source Sampling Manual; November 15, 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 Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

### G4. Compliance [OAR 340-218-0040(3)(n)(C), 340-218-0050(6), and 340-218-0080(4)]

- a. The permittee must comply with all conditions of this 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 is supplemental to, and does not sanction noncompliance with the applicable requirements on which it is based.
- c. For applicable requirements that will become effective during the permit term, the source must meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement.

### G5. Masking Emissions:

The permittee must not install or use any device or other means designed to mask the emission of an air contaminant that causes or is likely to cause detriment to health, safety, or welfare of any person or otherwise violate any other regulation or requirement. [OAR 340-208-0400] This condition is enforceable only by the State.

### G6. Credible Evidence:

Notwithstanding any other provisions contained in any applicable requirement, any credible evidence may be used for the purpose of establishing whether a person has violated or is in violation of any such applicable requirements. [OAR 340-214-0120]

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

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

G8. Open Burning [OAR Chapter 340, Division 264]

The permittee is prohibited from conducting open burning, except as may be allowed by OAR 340-264-0020 through 340-264-0200.

G9. Asbestos [40 CFR Part 61, Subpart M (federally enforceable), OAR Chapter 340-248-0005 through 340-248-0180 (state-only enforceable) and 340-248-0205 through 340-248-0280]

The permittee must comply with OAR Chapter 340, Division 248, 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, OAR 340-260-0040]

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

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

- a. Compliance with the conditions of the permit is 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. DEQ, 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 alters or affects 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 DEQ 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 DEQ.

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

Upon presentation of credentials and other documents as may be required by law, the permittee must allow DEQ, 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 an Oregon 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 state rules, sample or monitor, at reasonable times, substances or parameters, for the purposes of assuring compliance with the permit or applicable requirements.

G13. Fee Payment [OAR 340-220-0010, and 340-220-0030 through 340-220-0190]

The permittee must pay an annual base fee and an annual emission fee for particulates, sulfur dioxide, nitrogen oxides, and volatile organic compounds. The permittee must submit payment to the Department of Environmental Quality, Business Office, 700 NE Multnomah St., Suite 600 Portland, OR 97215, within 30 days of date DEQ mails the fee invoice or August 1 of the year following the calendar year for which emission fees are paid, whichever is later. Disputes must be submitted in writing to DEQ. Payment must be made regardless of the dispute. User-based fees will be charged for specific activities (e.g., computer modeling review, ambient monitoring review, etc.) requested by the permittee.

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

- a. The permittee must monitor for, and record, any off-permit change to the source that:
  - i. Is not addressed or prohibited by the permit;
  - ii. Is not a Title I modification;
  - iii. Is not subject to any requirements under Title IV of the FCAA;
  - iv. Meets all applicable requirements;
  - v. Does not violate any existing permit term or condition; and
  - vi. May result in emissions of regulated air pollutants subject to an applicable requirement but not otherwise regulated under this permit or may result in insignificant changes as defined in OAR 340-200-0020.
- b. A contemporaneous notification, if required under OAR 340-218-0140(2)(b), must be submitted to DEQ and the EPA.
- c. The permittee must keep a record describing off-permit changes made at the facility that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under the permit, and the emissions resulting from those off-permit changes.
- d. The permit shield of Condition G11 does not extend to off-permit changes.

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

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

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

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

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

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

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

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

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

G19. Staying Permit Conditions [OAR 340-218-0050(6)(c)]

Notwithstanding Conditions G16 and G17, the filing of a request by the permittee for a permit modification, revocation and re-issuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition.

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

The permittee must obtain approval from DEQ prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

G21. New Source Review Modification [OAR 340-224-0010]

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an Air Contaminant Discharge Permit (ACDP) from DEQ and having satisfied the requirements of OAR 340, Division 224.

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 OAR 340-214-0110]

The permittee must furnish to DEQ, within a reasonable time, any information that DEQ 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 DEQ copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to DEQ along with a claim of confidentiality.

G24. Reopening for Cause [OAR 340-218-0050(6)(c) and 340-218-0200]

- a. The permit may be modified, revoked, reopened and reissued, or terminated for cause as determined by DEQ.
- b. A permit must be reopened and revised under any of the circumstances listed in OAR 340-218-0200(1)(a).
- c. Proceedings to reopen and reissue a permit must follow the same procedures as apply to initial permit issuance and 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 expires at the end of its term, unless a timely and complete renewal application is submitted as described below. Permit expiration terminates the permittee's right to operate.
- b. Applications for renewal must be submitted at least 12 months before the expiration of this permit, unless DEQ requests an earlier submittal. If more than 12 months is required to process a permit renewal application, DEQ 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 will 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 [OAR 340-200-0020 and 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 [OAR 340-200-0020 and 340-218-0120(2)]

The permittee must have available at facility at all times a copy of the Oregon Title V Operating Permit and must provide a copy of the permit to DEQ or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

Western Region  
4026 Fairview Industrial Drive SE  
Salem, OR 97301  
503-378-8240