

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

DEQ – Eastern Region  
745 NE Bellevue Dr., Suite 110  
Bend, OR 97701

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

**ISSUED TO:**

Woodgrain Millwork, Inc.  
1917 Jackson Avenue  
La Grande, OR 97850

**INFORMATION RELIED UPON:**

Application Number: 30190  
Received: 7/30/18

**PLANT SITE LOCATION:**

62621 Oregon Highway 82  
La Grande, OR 97850

**LAND USE COMPATIBILITY STATEMENT:**

Issued by: Union Co. Planning Dept.  
Dated: 8/28/1995

**ISSUED BY THE DEPARTMENT OF ENVIRONMENTAL QUALITY**

  
Mark W. Bailey, Eastern Region Air Quality Manager

**MAY 24 2021**

Date

<u>Nature of Business</u>		<u>SIC</u>	<u>NAICS</u>
Particleboard Manufacturing	<u>Primary</u>	2493	321219
Fuel Burning Equipment	<u>Secondary</u>	4961	221330

**RESPONSIBLE OFFICIAL**

Title: Vice President, Lumber & Composites

**FACILITY CONTACT PERSON**

Name: Lindsay Warness  
Title: Safety & Environmental Manager  
Phone: (541) 962-2066

Table of Contents

LIST OF ABBREVIATIONS THAT MAY BE USED IN THIS PERMIT.....3

PERMITTED ACTIVITIES.....4

EMISSIONS UNIT (EU) AND POLLUTION CONTROL DEVICE (PCD) IDENTIFICATION .....4

EMISSION LIMITS AND STANDARDS, TESTING, MONITORING AND RECORDKEEPING  
REQUIREMENTS .....6

PLANT SITE EMISSION LIMITS.....36

EMISSION FEES.....38

GENERAL TESTING REQUIREMENTS .....38

GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS .....39

REPORTING REQUIREMENTS.....40

NON-APPLICABLE REQUIREMENTS .....45

GENERAL CONDITIONS .....45

11/15/2019

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

ACDP	Air Contaminant Discharge Permit	NSR	New Source Review
ASTM	American Society for Testing and Materials	O <sub>2</sub>	Oxygen
AQMA	Air Quality Maintenance Area	OAR	Oregon Administrative Rules
calendar year	The 12-month period beginning January 1st and ending December 31 <sup>st</sup>	ORS	Oregon Revised Statutes
CAO	Cleaner Air Oregon	O&M	Operation and Maintenance
CFR	Code of Federal Regulations	Pb	Lead
CO	Carbon Monoxide	PCD	Pollution Control Device
CO <sub>2e</sub>	Carbon Dioxide Equivalent	PM	Particulate Matter
CPMS	Continuous Parameter Monitoring System	PM <sub>10</sub>	Particulate Matter less than 10 microns in size
DEQ	Oregon Department of Environmental Quality	PM <sub>2.5</sub>	particulate Matter less than 2.5 microns in size
dscf	dry standard cubic foot	ppm	parts per million
EF	Emission Factor	PSD	Prevention of Significant Deterioration
EPA	US Environmental Protection Agency	PSEL	Plant Site Emission Limit
FCAA	Federal Clean Air Act	PTE	Potential to Emit
Gal	Gallon(s)	RACT	Reasonably Available Control Technology
GHG	Greenhouse Gas	scf	standard cubic foot
gr/dscf	grains per dry standard cubic foot	SER	Significant Emission Rate
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	SERP	Source Emission Reduction Plan
HCFC	Halogenated Chloro-Fluoro-Carbon	SIC	Standard Industrial Code
ID	Identification Number	SIP	State Implementation Plan
I&M	Inspection and Maintenance	SO <sub>2</sub>	Sulfur Dioxide
lb	Pound(s)	Special Control Area	as defined in OAR 340-204-0070
MMBtu	Million British thermal units	ST	Source Test
NA	Not Applicable	TACT	Typically Achievable Control Technology
NESHAP	National Emissions Standards for Hazardous Air Pollutants	VE	Visible Emissions
NO <sub>x</sub>	Nitrogen Oxides	VOC	Volatile Organic Compound
NSPS	New Source Performance Standard	Year	A period consisting of any 12-consecutive calendar months

**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 enforceable only 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)]

Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Line 1 Boiler and Dryers	B1	Line 1 boiler, natural gas-fired, propane backup	NA
	C9	Line 1 core dryer, B1 flue gas/natural gas-fired, propane backup	BH25
	C10	Line 1 face dryer, steam/natural gas-fired, propane backup	BH26
Line 2 Dryers	C14	Line 2 core dryer, steam/natural gas-fired, propane backup	BH28
	C15	Line 2 face dryer, steam/natural gas-fired, propane backup	BH29
Line 2 Boiler	B2	Line 2 boiler, sanderdust/natural gas-fired, propane backup	DESP
Green Furnish Dryer	GFD/C46	Green furnish dryer, sanderdust-fired, natural gas pilot	C46A, C46B, WESP, RTO
	C47	GFD sanderdust feed bin	BH21
	C48	Line 1 and 2 pre-dried silo vents	BH22
Presses	P1	Line 1 press, steam heated	TCO
	P2	Line 2 press, steam heated	
Board Coolers	BC1	Line 1 particleboard cooler	NA
	BC2	Line 2 particleboard cooler	NA
Material Storage (MS) Cyclones	C1	Transfer to line 2 storage	BH27
	C2	Transfer to line 2 storage	BH2, BH3
	C3	Transfer to line 1 storage	BH1
	C4	Transfer to line 1 storage	NA
	C39	Transfer from truck dumps to #3 storage area	BH18
	C43	Vent from line 2 dry silos	BH19
	C55	Transfer from hog to storage area #2 or #3	BH31



Emission Unit Description	EU ID	Pollution Control Device Description	PCD ID
Line 1 Milling and Drying (MD1) Cyclones	C11	Line1 core dryer infeed	BH4
	C12	Line 1 face dryer infeed	BH5
	C42	Line 1 reject bin outfeed	BH5
	C53	Line 1 core screen	BH4
	C54	Line 1 face screen	BH5
(MD2-1) Cyclone	C32	Line 2 face refiner infeed	BH9
Line 2 Mill and Drying (MD2-2) Cyclones	C16	Line 2 face dryer infeed	BH9
	C17	Line 2 core dryer infeed	BH8
	C31	Line 2 core refiner infeed	BH8
	C40	Line 2 core fines bypass	To C17
	C41	Line 2 face fines bypass	To C16
Blending and Forming (BF) Cyclones	C18	Line 1 mat saw/former reject	BH17
	C20	Line 2 mat saw/former reject	BH16
	C22	Line 2 reject bin	BH14
	C23	Line 1 reject bin	NA
	C38	Line 1 former air system	BH15
	C50	Line 2 former air system	BH23
Sanderdust Relay (SR) Cyclones	C19	Line 1 Jenkins saw	BH10
	C21	Remanufacture waste to storage	BH10
	C24	Line 2 sanderdust bin infeed	Closed loop
	C25	Line 2 sanderdust blower cyclone	BH12
	C26	Line 2 sanderdust blower cyclone	BH12
	C27	Line 1 sanderdust blower	BH13
	C28	Line 2 boiler sanderdust infeed	BH20
	C30	Line 1 sanderdust loop	Closed loop
	C36	Line 1 Jenkins saw	BH10
	C37	Line 1 sanderdust blower cyclone	BH13
	C51	Line 1 sanderdust re-introduction bin	BH30
	C52	Line 2 sanderdust re-introduction bin	BH14
Emergency Engines	ENG	Emergency generator and fire pump	NA
Aggregate Insignificant	AI	Storage piles, paved roads	NA

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

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

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
OAR 340-208-0210(1), 340-234-0520(1), 1/19/95 ACDP Condition 7	4	Fugitive Emissions	Minimize	NA	NA	5
340-208-0300	6	Nuisance	No Nuisance	NA	NA	8
340-208-0450	7	PM >250 $\mu$	No Fallout	NA	NA	8
340-228-0110(2)	9	#2 Fuel Oil Sulfur Content	$\leq 0.5\%$ Sulfur by Weight	Each Shipment	NA	10
40 CFR Part 68	11	Risk Management	Risk Management Plan	NA	NA	11

### Fugitive Emissions

4. Applicable Requirement: The permittee must not cause or permit any materials to be handled, transported or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but not be limited to the following: [OAR 340-208-0210(1), 340-234-0520(1), 1/19/95 ACDP Condition 7]
  - a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - b. Application of water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;
  - c. Enclose the truck dump and storage areas holding or intended to hold raw materials to prevent windblown particle emissions from these areas from being deposited upon property not under the ownership of the source;
  - d. Temporary storage of raw materials outside the regularly used areas of the plant site is prohibited unless DEQ is notified and grants written approval for said storage. Temporary storage areas authorized by DEQ may not be operated in excess of six months from the date they are first authorized;
  - e. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
  - f. Adequate containment during sandblasting or other similar operations;



- g. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
- h. Prompt removal from paved streets of earth or other material that does or may become airborne.

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 week 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:
  - a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Condition 4; or
  - 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. [OAR 340-218-0050(3)(a)]
  - 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 complaint received by the permittee in person, in writing, by telephone or through other means that specifically refer to air pollution or odor concerns associated with and during the operation of the permitted facility. Documentation must include date of contact, time and description of observed pollution or odor 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 24 hours, if possible. This condition is enforceable only by the state. [OAR 340-218-0050(3)(a)]

## Fuels

9. Applicable Requirement: If the permittee burns diesel in the emergency generators or fire pump, the sulfur content cannot exceed 0.5% sulfur by weight for ASTM Grade 2 fuel oil. [OAR 340-228-0110(2)]
10. Monitoring Requirement: The permittee must monitor the sulfur content of each shipment of fuel received by: [OAR 340-218-0050(3)(a)]
  - a. Obtaining a sulfur content certificate from each vendor for each shipment of fuel received; or
  - b. Obtaining a certificate from each vendor to annually certify that no diesel fuel delivered to the facility contains no more than 0.5% sulfur, on a weight basis;
  - c. Analyzing or having analyzed by a contract laboratory a representative sample taken by the permittee from each shipment of fuel received.

## Accidental Release Prevention/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]

## Emissions Unit Boiler 1 (B1) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b)	12	Visible Emissions	20% Opacity	6-Minute Block Average	14	15
340-228-0210(2)(a)(B)(ii)	13	PM	0.15 gr/dscf @ 50% Excess Air	Avg. of 3 Test Runs	14	15
40 CFR 63.7540(a)(10)	16	Work Practice	Annual Tune-Up	NA	NA	17.c

12. Applicable Requirement: Visible emissions from Boiler 1 (B1) must not equal or exceed an average opacity of 20%. [OAR 340-208-0110(3)(b)] The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. If required, six-minute block averages are measured by EPA Method 9.



13. Applicable Requirement: Boiler 1 must not emit particulate emissions in excess of 0.15 grains per dry standard cubic foot corrected to 50% excess air. [OAR 340-228-0210(2)(a)(B)(ii), 340-228-210(3)(b)]
14. Testing Requirements: Due to limited emissions from Boiler 1, DEQ is not requiring any testing to demonstrate compliance with the applicable emission limits and standards. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods in DEQ's source sampling manual.
15. Monitoring Requirement: The permittee must only burn natural gas and propane in Boiler 1. The permittee must monitor the types of fuel burned in Boiler 1 by keeping records of the amount and type of each fuel burned. [OAR 340-218-0050(3)(a)]
16. Applicable Requirement: The permittee must conduct a tune-up of Boiler 1 annually as specified in 40 CFR 63.7540(a)(10). Each subsequent tune-up must be conducted no more than 13 months after the previous tune-up. [40 CFR 63.7515(d)]
17. Recordkeeping Requirements: The permittee will maintain the following process records: [OAR 340-218-0050(3)(b)]
- Daily and annual records of the steam produced (lb);
  - Type and amount of fuels used in the boiler;
  - Records of the annual tune ups;
  - Records of the energy assessment;
  - Records all inspections, repairs, replacements, calibrations or other maintenance pertaining to the above listed requirements;
  - Air upset or excess emission logs.

#### Emissions Unit Boiler 2 (B2/DESP) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(6)	18	Visible Emissions	20% Opacity	6-minute Block Average	NA	27
340-228-0210(2)(b)	19	PM	0.10 gr/dscf @ 12% CO <sub>2</sub>	Avg. of 3 Test Runs	23	20, 21, 24
40 CFR 63.7500(a)(1)	22.a.i or	Filterable Particulate or	0.051 lb/MMBtu Heat Input, or 0.052 lb/MMBtu Steam Output	Avg. of 3 Test Runs	23	20, 22.f, 25, 26
	22.a.ii	Total Selected Metals	6.5E-03 lb/MMBtu Heat Input, or 0.052 lb/MMBtu Steam Output	Avg. of 3 Test Runs	23	26, 29

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
40 CFR 63.7500(a)(1)	22.b	Carbon Monoxide	2,400 ppmv, dry @ 3% O <sub>2</sub> , or 1.9 lb/MMBtu Steam Output	Avg. of 3 Test Runs	23	22.f, 24
	22.c	Mercury	5.7E-06 lb/MMBtu Heat Input, or 6.4E-06 lb/MMBtu Steam Output	Avg. of 3 Test Runs	23	26, 29
	22.d	HCl	0.022 lb/MMBtu Heat Input, or 0.025 lb/MMBtu Steam Output	Avg. of 3 Test Runs	23	26, 29
	22.f	Work Practice	Tune-Up	Annually	NA	30.g
40 CFR 63.7500(a)(2)	25	Visible Emissions	10% Opacity	Daily Block Average	23	27
40 CFR 63.7500(f)	28	Startup/Shutdown	Fuel Limitations During Startup, CMS Operating	NA	NA	28

18. Applicable Requirement: Visible emissions from Boiler 2 (B2) must not equal or exceed an average opacity of 20% except for two independent six-minute blocks in any hour as long as the average opacity during each of these two six-minute blocks is less than 40%. [OAR 340-208-0110(6)] The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by a continuous opacity monitoring system (COMS) installed and operated in accordance with the DEQ Continuous Monitoring Manual or 40 CFR Part 60
19. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) from Boiler 2 in excess of 0.10 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub>. [OAR 340-228-0210(2)(b)(A), 340-228-0210(3)(a)]
20. Monitoring Requirement: The permittee shall calibrate, maintain and operate a continuous monitoring system for measuring the voltage (kV) and amperage (mA) of the dry electrostatic precipitator (DESP) in accordance with the manufacturer's written instructions. The voltage and amperage shall be displayed at least once every minute. An hourly average voltage shall be recorded. [OAR 340-226-0120(1)(a)]



- a. An excursion is defined as a one-hour average voltage reading which is less than 20 kV, except during startup and shutdown. [OAR 340-218-0050(3)(a)] For a voltage excursion the permittee shall take corrective action as expeditiously as practical. All corrective actions taken shall be documented by date, time, corrective action taken, person taking the action, and shall be recorded in a B2/DESP operating log.
  - b. Minimum data availability shall be 90% for any day, month and year. Monitor data availability shall be determined excluding periods of calibration and routine maintenance.
  - c. Operating the DESP outside the allowable voltage range is not necessarily a violation of the particulate matter emission standard.
21. Monitoring Requirement: The permittee shall develop and implement a Boiler 2 and DESP Operation, Monitoring and Maintenance Manual (B2/DESPOM<sup>3</sup>). The B2/DESPOM<sup>3</sup> shall specify the minimum required inspection, monitoring, maintenance, trouble-shooting, training and calibration as well as procedures for managing excursions and upsets, including the allowable operating modes and ranges, to ensure B2 and the DESP are operated at the highest reasonable efficiency and effectiveness to minimize emissions of air contaminants. The B2/DESPOM<sup>3</sup> shall be reviewed and updated as needed.
  - a. At least twice each year the permittee shall visually inspect, calibrate and replace, as needed, those components of the DESP that may affect its PM removal efficiency. Any deficiencies noted shall be repaired, replaced or otherwise remedied to ensure efficient operation of the unit as expeditiously as practical. The results of the inspection and any repair or replacement activities shall be recorded in a log.
  - b. At least twice each year the permittee shall inspect those aspects of B2 that may affect good combustion or other performance indicators, in accordance with the manufacturer's recommendations. This shall include natural gas and sanderdust burner, FD and ID fan linkage, oxygen sensors, oxygen alarms, and calibration of sensors and other monitoring devices. All aspects of B2 that are determined not to be in an acceptable condition shall be repaired or replaced as expeditiously as practical. At least twice per year and whenever repair or replacement of any monitoring device occurs, calibrate said devices in accordance with the vendor's specifications. The results of the inspection and any repair or replacement activities shall be recorded in a log.
22. Applicable Requirement: The permittee must comply with the following emission limits and work practices. The emission limits apply at all times during operation except for Boiler 2 startup and shutdown. [40 CFR 63.7500(a)(1), (f)]
  - a. The permittee must to comply with one of the following limits: [40 CFR 63.7500, Table 2, Item 10.b]
    - i. Filterable particulate matter must not exceed 0.051 lb/MMBtu heat input or 0.052 lb/MMBtu steam output;

- ii. Total selected metal (TSM) emissions (sum of arsenic, beryllium, cadmium, chromium, lead, manganese, nickel and selenium emissions) must not exceed 6.5E-03 lb/MMBtu heat input or 6.6E-03 lb/MMBtu steam output.
  - b. Emissions of carbon monoxide (CO) must not exceed 2,400 ppmv, dry basis at 3% O<sub>2</sub> or 1.9 lb/MMBtu steam output. [40 CFR 63.7500, Table 2, Item 10.a]
  - c. Emissions of mercury must not exceed 5.7E-06 lb/MMBtu heat input or 6.4E-06 lb/MMBtu steam output. [40 CFR 63.7500, Table 2, Item 1.b]
  - d. Emissions of hydrogen chloride (HCl) must not exceed 0.022 lb/MMBtu heat input or 0.025 lb/MMBtu steam output. [40 CFR 63.7500, Table 2, Item 1.a]
  - e. If demonstrating compliance with a steam output based limit, the permittee may use efficiency credits earned from implementation of energy conservation measures taken after January 1, 2008 in accordance with 40 CFR 63.7533 to comply with the standards.
  - f. The permittee must conduct a tune-up of Boiler 2 annually as specified in 40 CFR 63.7540(a)(10). Each tune-up must be conducted no more than 13 months after the previous tune-up. [40 CFR 63.7515(d), Table 3, 3]
23. Boiler 2 Testing Requirements: The permittee must conduct compliance testing, emission factor verification and/or performance tests in accordance with Condition 80, DEQ's Source Sampling Manual, and 40 CFR 63.7520 using the following test methods and frequencies. As an alternative, compliance with the HCl, mercury and total selected metal limits may be demonstrated by fuel analysis in accordance with Condition 29. [40 CFR 63.7505(c)]

Pollutant/Parameter	Test Method	Frequency	Purpose
Particulate (filterable) Particulate (total)	EPA Method 5 or 17 ODEQ Method 5	Annually Once during permit term	Compliance testing EF verification
Opacity	COMS and/or EPA Method 9	Continuous for COMS M9 during PM test	Compliance testing
NO <sub>x</sub>	EPA Method 7E	Once during permit term	EF verification
CO	EPA Method 10	Annually	Compliance testing EF verification
Total Selected Metals (TSM)	EPA Method 29	Annually	Compliance testing
Mercury	EPA Method 29, 30A, 30B, 101A, or ASTM D6784	Annually	Compliance testing
Hydrogen Chloride (HCl)	EPA Method 26 or 26A	Annually	Compliance testing

- a. Annual tests must be completed no more than 13 months after the preceding test. [40 CFR 63.7515(a)]
- b. Three tests must be performed for each pollutant, each a minimum of 60 minutes duration. More specifically, one-hour (minimum) test durations are required for NO<sub>x</sub>, CO and HCl. Minimum sample volumes of 2 dscm (per test run) are



required for particulate and TSM tests. A minimum sample volume of 3 dscm (per test run) is required for mercury (by EPA Method 29). [40 CFR 63.7500, Table 2, Items 1, 10]

- c. During the performance verification testing, the steaming rate must be at least 90% of normal maximum operating capacity, as determined from the prior 6 months of operating data.
- d. During each test run, the permittee must record the following information:
  - i. Test location;
  - ii. Sanderdust sampling and analysis, including but not limited to fuel characteristics (Btu);
  - iii. Boiler operating conditions, including but not limited to:
    - A. Steaming rate (lb/hr);
    - B. Steam pressure (psig);
    - C. Hourly average oxygen concentration (%).
  - iv. Dry electrostatic precipitator operating conditions, including but not limited to:
    - A. Number of T/R sets operating;
    - B. Voltage of each T/R set (kV);
    - C. Current of each T/R set (mA).
  - v. Emission results must be reported as follows:
    - A. Total particulate for each test run (gr/dscf, gr/dscf @ 12% CO<sub>2</sub>, lb/hr, lb/1000 lb steam, lb/MMBtu heat input or lb/MMBtu steam output);
    - B. If measuring total selected metals report as lb/MMBtu heat input or lb/MMBtu steam output;
    - C. Opacity for each run (%) – either from COMS or EPA Method 9 readings conducted either during each test run or no greater than 30 minutes before or after each run;
    - D. Outlet NO<sub>x</sub> emissions from each test run (ppmv, lb/hr, lb/1000 lb steam);
    - E. Outlet CO emissions from each test run (ppmv, dry @ 3% O<sub>2</sub>, lb/hr, lb/1000 lb steam, lb/MMBtu steam output);
    - F. Outlet mercury emissions from each test run (lb/MMBtu heat input or lb/MMBtu steam output);
    - G. Outlet HCl emissions from each test run (lb/MMBtu heat input or lb/MMBtu steam output).
- e. If performance tests for a given pollutant are at or below 75% of the emission limits in Conditions 22.a through 22.d for two consecutive years and if there are no changes to the boiler or control equipment that could increase emissions, the permittee may conduct performance tests for that pollutant every third year. Each such performance test must be conducted no more than 37 months after the previous performance test. If a performance test shows emissions exceeded the limit or 75% of the emission limit for a pollutant, the permittee must conduct annual performance tests for that pollutant until all performance tests over a

consecutive 2-year period are at or below 75% of the emission limit. [40 CFR 63.7515(b), (c)]

24. Monitoring Requirement: The permittee must operate and maintain an oxygen analyzer system for Boiler 2 in accordance with the manufacturer's recommendations to monitor compliance with the CO limit. The permittee must continuously monitor the oxygen content, reducing the data to 30-day rolling averages as defined in 40 CFR 63.7575. The permittee must maintain the 30-day rolling average oxygen content at or above the lowest hourly average oxygen concentration measured during the most recent CO performance test. [40 CFR 63.7540(a), Table 8, Item 9]
25. Applicable Requirement: The permittee must maintain opacity less than or equal to 10% opacity on a daily block average. [40 CFR 63.7500(a)(2), Table 4, 4.a] The daily block average is the arithmetic mean of all valid opacity readings recorded when Boiler 2 is operated over the 24-hour period from 12 A.M. (midnight) to 12 A.M. (midnight), except for periods of startup and shutdown or downtime. [40 CFR 63.7575]
26. Monitoring Requirement: The permittee must monitor the operational load of the boiler and maintain the operating load such that it does not exceed 110% of the highest hourly average operating load recorded during the most recent performance test. [40 CFR 63.7500(a)(2), Table 4, Item 7, Table 7, Item 5]
27. Monitoring Requirement: The permittee must operate, certify and maintain a continuous opacity monitoring system (COMS) according to Performance Specification 1 at 40 CFR 60, Appendix B and 40 CFR 63.7525(c). The permittee must develop a site specific monitoring plan that addresses design, data collection, and the quality assurance and quality control elements described in 40 CFR 63.7505(d). The opacity monitoring data shall be reduced to 6-minute averages and the daily block average calculated. [40 CFR 63.7540, Table 8, Item 1]
28. Applicable Requirement: During startup of Boiler 2 the permittee must use one or a combination of the following clean fuels: natural gas, synthetic natural gas, propane, distillate oil, syngas, ultra-low sulfur diesel, fuel oil-soaked rags, kerosene, hydrogen, paper, cardboard, refinery gas, or liquefied petroleum gas. All continuous monitoring systems must be operating during startup and shutdown. Anytime sanderdust is burned the exhaust must be vented through control devices to the common stack. [40 CFR 63.7500(f), Table 3, Item 5, 6]
29. Monitoring Requirement: If electing to demonstrate compliance with the standards for mercury, HCl or TSM by fuel analysis, the permittee must conduct a monthly fuel analysis of sanderdust burned according to 40 CFR 63.7521. [40 CFR 63.7515(e)] Fuel analysis is not required for fuels used only for startup, shutdown and transient flame stability purposes. [40 CFR 63.7521(a)] Fuel analysis is not required for natural gas. [40 CFR 63.7510(b)] The monthly analysis for sanderdust can be completed anytime within the calendar month as long as the analysis is separated by 14 days from the previous analysis. The permittee must obtain at least 3 composite fuel samples according



to 40 CFR 63.7521(c), prepare each composite sample according to 40 CFR 63.7521(d) and analyze the sample according to 40 CFR 7521(e). Data from the fuel analyses must be used to calculate emissions of mercury, HCl or TSM with a 90% confidence level according to 40 CFR 63.7530(c). The calculated emissions must be compared to and be less than the corresponding emission limit to determine compliance on a 12-month rolling average. [40 CFR 63.7540(a)] If 12 consecutive fuel analyses demonstrate 75% or less of the compliance level, the frequency of fuel analysis can be decreased to quarterly. If any quarterly sample exceeds 75% of the compliance level or a new type of fuel is burned, the frequency reverts to monthly monitoring until 12 months of fuel analyses are again less than 75% of the compliance level. [40 CFR 63.7515(e)]

30. Recordkeeping Requirements: The permittee will maintain the following process records for Boiler 2: [OAR 340-218-0050(3)(b)]

- a. Hourly and annual records of the steam produced (lb);
- b. Hourly average residual oxygen (%);
- c. Hourly average voltage readings or the DESP (kV);
- d. Monthly records of natural gas or propane combusted (MMft<sup>3</sup>);
- e. Type and amount of fuels burned during startup;
- f. Monthly records of sanderdust burned in Boiler 2 (BDT);
- g. Records of the annual tune ups;
- h. Records of the energy assessment;
- i. Corrective action logs;
- j. Occurrence and length of downtime for maintenance of B2 and DESP;
- k. Records of all relevant inspections, repairs, replacements, calibrations or other maintenance;
- l. Air upset or excess emission logs.

#### Emissions Unit Green Furnish Dryer (GFD/C46A and C46B/WESP/RTO-1) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(4)	31	Visible Emissions	20% Opacity	6-Minute Block Bverage	NA	35, 37
340-228-0210(2)(b)(B)	32	PM	0.14 gr/dscf @ 12% CO <sub>2</sub>	Avg. of 3 Test Runs	34	35, 37
40 CFR 63.2240(b) Table 1B-option 3	33	Methanol	90% Reduction	Avg. of 3 Test Runs	NA	36, 37

31. Applicable Requirement: Visible emissions from the Green Furnish Dryer (GFD) must not equal or exceed an average opacity of 20%. [OAR 340-208-0110(4)] The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing

the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by EPA Method 9 when necessary.

32. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) from the green furnish dryer in excess of 0.14 grains per dry standard cubic foot, corrected to 12% CO<sub>2</sub>. [OAR 340-228-0210(2)(b)(B), 340-228-0210(3)(a)]
33. Applicable Requirement: The permittee shall reduce methanol emissions from the GFD/RTO by 90%. [40 CFR 63.2240(b), Table 1 – Option 3]
- a. Prior to August 13, 2021 the methanol reduction limit does not apply during periods of GFD or RTO startup, shutdown and malfunction, periods of GFD initial startup, and during routine RTO maintenance exemptions specified in Condition 33.b. [40 CFR 63.2250(a)] The permittee must operate the GFD and RTO during startups, shutdowns and malfunctions in accordance with a written startup shutdown and malfunction plan (SSMP) in accordance with the general duty provisions of 40 CFR 63.6(e)(1)(i) and §63.6(e)(3).
  - b. The permittee may request a routine control device maintenance exemption for routine maintenance events such as RTO bakeouts, washouts, media replacement and replacement of corroded parts. The request must: [40 CFR 63.2251(a)]
    - i. justify the need for routine maintenance and the time required to accomplish the maintenance;
    - ii. describe the maintenance activities and the frequency of the activities;
    - iii. explain why maintenance cannot be accomplished during process shutdowns;
    - iv. describe how the permittee plans to make reasonable efforts to minimize emissions during the maintenance; and
    - v. provide any other documentation required by DEQ.
  - c. The routine maintenance activity must not exceed 3% of the annual operating uptime of the GFD. [40 CFR 63.2251(b)]
  - d. If approved, the routine maintenance exemption is incorporated by reference and considered attached to this permit. [40 CFR 63.2251(c)]
  - e. To the extent practical, startup and shutdown of the RTO must be scheduled during times when the GFD is also shut down. [40 CFR 63.2251(e)]
  - f. After August 13, 2021 the permittee must comply with the methanol reduction limit except: [40 CFR 63.2250(f)]
    - i. Prior to GFD/RTO initial startup;
    - ii. During safety-related shutdowns. These safety-related shutdowns shall follow documented site-specific procedures such as use of automated controls or other measures developed to protect workers and equipment to ensure that the flow of green furnish, and fuel ceases and that material is removed from the dryer as expeditiously as possible given the system design to reduce air emissions. [40 CFR 63, DDDD Table 3-item 6]
    - iii. The permittee must minimize the length of time when the methanol reduction is not met due to Condition 33.ii.



- g. The permittee must always operate and maintain the GFD and associated control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by this condition. The general duty to minimize emissions does not require making any efforts to reduce emissions if the 90% methanol emission limit has been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to DEQ which 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. 2250(g)]

34. **Testing Requirements:** The permittee shall conduct emission factor verification tests in accordance with DEQ's Source Sampling Manual for the pollutants listed below at least once during the permit term, using the following test methods. [OAR 340-212-0120] A test to demonstrate compliance with Condition 33 must be conducted by August 13, 2023 and thereafter within 60 months of the previous compliance test. [40 CFR 63, Subpart DDDD, Table 7 – Item 7]

Pollutant	Test Method
PM	DEQ Method 7
NO <sub>x</sub>	EPA Method 7
CO	EPA Method 10
VOC	EPA Method 25A
Methanol	EPA Method 308

The permittee shall submit a report of all emission factor verification tests to DEQ within 45 days of any test. The summary shall include the following information:

- a. Process parameters during the test (GFD production, BDT/hr), sanderdust burned (BDT/hr), GFD temperature, drying time, and control device parameters such as cyclone  $\Delta P$ , WESP voltage/amperage, RTO temperature, etc.
- b. Emission results in lb/hr and lb/BDT.
35. **Monitoring Requirement:** The permittee shall calibrate, maintain, operate and record the output of a continuous monitoring system for measuring the voltage (kV) and amperage (mA) of the wet electrostatic precipitator (WESP) in accordance with the manufacturer's written instructions. The voltage and amperage shall be displayed at least once every minute. An hourly average voltage shall be recorded. [OAR 340-212-0200(1)]
- a. An excursion is defined as a one-hour average voltage reading which is less than 20 kV, except during startup and shutdown. [OAR 340-218-0050(3)(a)] For a voltage excursion the permittee shall take corrective action as expeditiously as practical. [OAR 340-212-0250(4)(a)] All corrective actions taken shall be documented by date, time, corrective action taken, person taking the action, and shall be recorded in a WESP operating log.
- b. Minimum data availability shall be 90% for any day, month and year. Monitor data availability shall be determined excluding periods of calibration and routine maintenance.



- c. Operating the WESP outside the allowable voltage range is not necessarily a violation of the particulate matter emission standard.
36. Monitoring Requirement: The permittee shall calibrate, maintain, operate and record the output of a continuous monitoring system for measuring the RTO combustion chamber temperature in accordance with 40 CFR 63.2269. The temperature sensor must be located in a position that provides representative temperature and has a minimum accuracy of 4°F or 0.75% of the temperature value, whichever is larger. The temperature sensor's reading must be validated at least semiannually using the requirements of 40 CFR 63.2269(b)(4). A validation check is also required any time the sensor exceeds the manufacturer's specified maximum operating temperature range or a new temperature sensor is installed. At least quarterly all components shall be inspected for integrity and all electrical connections for continuity, oxidation and galvanic corrosion. [40 CFR 63.2269]
- a. The 3-hour block average firebox temperature shall be maintained above the minimum temperature established during the methanol reduction compliance test. [40 CFR 63, Subpart DDDD, Table 1 – Item 1]
  - b. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct monitoring all times that the GFD is operating. For purposes of calculating data averages, the permittee shall not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitor malfunction is any sudden, infrequent, not reasonably preventable failure of the monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available constitutes a deviation from the monitoring requirements. [40 CFR 63.2270(b)]
  - c. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities, or data recorded during periods of safety-related shutdown, or RTO downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement. [40 CFR 63.2270(c)]
  - d. The 3-hour block average shall use all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described above). [40 CFR 63.2270(d)]
  - e. To calculate a 3-hour average, the permittee must have at least 75% of the required recorded readings that are based on valid data. [40 CFR 63.2270(f)]
37. Monitoring Requirement: The permittee shall develop and implement a WESP Operation, Monitoring and Maintenance Manual (WESPOM<sup>3</sup>). The WESPOM<sup>3</sup> shall specify the minimum required inspection, monitoring, maintenance, trouble-shooting,



training and calibration as well as procedures for managing excursions and upsets, including the allowable operating modes and ranges, as required, to ensure the WESP is operated at the highest and best practicable treatment and control. The WESPOM<sup>3</sup> shall be reviewed and updated as needed.

- a. At least twice each year the permittee shall visually inspect, calibrate, adjust and replace, as needed, those components of the WESP that may affect its PM removal efficiency, as specified by the vendor. Any deficiencies noted shall be repaired, replaced or otherwise remedied to ensure efficient operation of the unit as expeditiously as practical. [OAR 340-226-0120(2)(b)(A)] The results of the inspection and any repair or replacement activities shall be recorded in a log.
- b. The permittee shall develop and implement an RTO Operation, Monitoring and Maintenance Manual (RTOM<sup>3</sup>). The RTOM<sup>3</sup> shall specify the minimum required inspection, monitoring, maintenance, trouble-shooting, training and calibration as well as procedures for managing excursions and upsets, including the allowable operating modes and ranges to ensure the RTO is operated at the highest reasonable efficiency and effectiveness to minimize emissions of air contaminants. [OAR 340-226-0120(1)(a)] The RTOM<sup>3</sup> shall be reviewed and updated as needed.
- c. The permittee shall develop a written startup, shutdown and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the GFD and RTO during periods of startup, shutdown and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with Condition 33.a.

38. Recordkeeping Requirements: The permittee will maintain the following records: [40 CFR 63.2282]

- a. A copy of each notification reported to comply with 40 CFR 63, Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status;
- b. Records kept to demonstrate compliance with the SSMP prior to 8/13/21. After 8/13/21 the records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions as specified below: [40 CFR 63.2282(a)(2)]
  - i. Record the date, time and duration of each startup and/or shutdown period, including the periods when the GFD was subject to the standard applicable to startup and shutdown.
  - ii. In the event the GFD fails to meet an applicable standard, record the number of failures, for each failure record the date, time, cause and duration of each failure.
  - iii. For each failure to meet an applicable standard, record and retain a list of the affected sources and equipment and the following information:
    - A. For any failure to meet the methanol reduction limit, record an estimate of the quantity of each regulated pollutant emitted over

any emission limit and a description of the method used to estimate emissions.

- B. For each failure to maintain the RTO temperature in accordance with the limit in Condition 36, the permittee must maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by DEQ.
  - iv. Record actions taken to minimize emissions in accordance with Condition 33.g.
  - c. Documentation of any approved routine control device maintenance exemption, if requested under 40 CFR 63.2251;
  - d. Records of performance tests and performance evaluations required in 40 CFR 63.10(b)(2)(viii).
  - e. Records of the RTO temperature required in Condition 36;
39. The permittee shall develop and implement a recordkeeping program as part of the WESPOM<sup>3</sup> and RTOM<sup>3</sup>. Supporting information includes all calibration and maintenance records, and all original strip-chart recordings for COMS systems, etc., and copies of all reports required by the permit. [OAR 340-218-0050(3)(b)] At a minimum, the following records shall be kept:
- a. Records documenting the date and time of all relevant inspections, including appropriate inspection points and allowable conditions;
  - b. Records showing inspection, maintenance, replacement, calibration of all pressure sensors, thermocouples, natural gas meters, as well as any other device used to automatically collect data in support of showing compliance with the conditions here. Records shall be kept showing sensors or switches calibrated (or replaced), method used, date of calibration and who completed the required calibration;
  - c. WESP voltage readings (hourly average);
  - d. Corrective action logs, as applicable;
  - e. Air upset or excess emission logs, as applicable;
  - f. RTO combustion chamber temperature, (hourly average °F);
  - g. Daily and annual green furnish dried (BDT).

#### **Emissions Unit Line 1 & 2 Dryers (C9/BH25, C10/BH26, C14/BH28, C15/BH29) Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b)	40	Visible Emissions	20% opacity	6-minute block average	43	44, 46
340-226-0210(2)(a)(B)(ii)	41	PM	0.15 gr/dscf	avg. of 3 test runs	43	44, 46
40 CFR 63.2241(a) Table 3-Item 1	42	Inlet Moisture, Temperature	≤30% (by weight, dry), ≤600°F	24-hour block	NA	45



40. Applicable Requirement: Visible emissions from the Line 1 & 2 Dryers (C9/BH25, C10/BH26, C14/BH28, C15/BH29) must not equal or exceed an average opacity of 20%. [OAR 340-208-0110(3)(b)] The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by EPA Method 9 when necessary.
41. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) from the Line 1 & 2 dryers in excess of 0.15 grains per dry standard cubic foot. [OAR 340-226-0210(2)(a)(B)(ii)]
42. Applicable Requirement: The permittee shall maintain the moisture content of furnish at the inlet of the dryers less than or equal to 30% by weight, dry basis as a 24-hour block average. The 24-hour block average inlet dryer temperature shall be maintained less than or equal to 600°F. [40 CFR 63.2241(a), Table 3 – Item 1]
- a. Prior to August 13, 2021, the dryer inlet moisture and temperature limits do not apply during periods of dryer startup, shutdown and malfunction, and prior to dryer initial startup. [40 CFR 63.2250(a)] The permittee must operate the dryers and associated baghouses during startups, shutdowns and malfunctions in accordance with a written startup shutdown and malfunction plan (SSMP) in accordance with the general duty provisions of 40 CFR 63.6(e)(1)(i) and §63.6(e)(3). [40 CFR 63.2250(b), (c)]
  - b. After August 13, 2021 the permittee must comply with the dryer inlet moisture and temperature limits except: [40 CFR 63.2250(f)]
    - i. Prior to initial startup of the dryers;
    - ii. During safety-related shutdowns. These safety-related shutdowns shall follow documented site-specific procedures such as use of automated controls or other measures developed to protect workers and equipment to ensure that the flow of furnish, and fuel or processes heat ceases and that material is removed from the dryers as expeditiously as possible given the system design to reduce air emissions. [40 CFR 63, DDDD Table 3-item 6]
    - iii. The permittee must minimize the length of time when the dryer inlet moisture and temperature limits are not met due to Condition 42.b.ii.
  - c. The permittee must always operate and maintain the dryers and associated control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by this condition. The general duty to minimize emissions does not require making any efforts to reduce emissions if the dryer inlet moisture and temperature limits have been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to DEQ which 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. 2250(g)]

43. Testing Requirements: The permittee shall conduct emission factor verification tests on each dryer in accordance with DEQ's Source Sampling Manual for the pollutants listed below at least once during the permit term using the following test methods. [OAR 340-212-0120]

Pollutant	Test Method
PM	DEQ Method 7
VOC	EPA Method 25A

The permittee shall submit a report of all emission factor verification tests to DEQ within 45 days of any test. The summary shall include the following information:

- a. Process parameters during the test (line production, 1000 ft<sup>2</sup>/hr – ¾" basis), amount of natural gas burned in each dryer (ft<sup>3</sup>/hr), dryer temperature, moisture content of furnish at dryer inlet, and control device parameters such as baghouse pressure drop.
  - b. Emission results in lb/hr, lb/Msf-3/4" basis, grains PM/dscf.
44. Monitoring Requirement: The permittee shall complete the minimum monitoring of each baghouse BH25, BH26, BH28 and BH29 as shown below: [OAR 340-218-0050]
- a. At least monthly the permittee shall inspect each baghouse, record the pressure drop through the baghouse and complete a visual survey of the device to determine if fugitive emissions from each unit are being adequately controlled;
  - b. At least semi-annually the permittee shall inspect each baghouse and determine if the following devices are working properly: sweep chains, fans and dampers, including proper fan motor balancing, abort gate damper/actuators and seals, spark detection system, and any alarms associated with proper functioning of the unit;
  - c. If any deficiencies are noted during any inspection, the permittee must take action as expeditiously as possible to ensure the unit is operated in compliance with the permit.
45. Monitoring Requirement: The permittee shall calibrate, maintain, operate and record the output of a continuous monitoring system for measuring the moisture of furnish and the temperature at the inlet to the Line 1 and Line 2 dryers to show compliance with Condition 42 in accordance with 40 CFR 63.2269. The permittee shall also keep records of the inlet furnish moisture content and the inlet dryer temperature. [40 CFR 63.2271(a), Table 8, Item 1]
- a. The continuous moisture monitor must be located in a position that provides a representative measure of furnish moisture and have a minimum accuracy of 1% (dry basis) moisture or better in the 25% - 35% (dry basis) moisture content range. Alternatively, the permittee may use a continuous moisture monitor with a



- minimum accuracy of 5% (dry basis) moisture or better if the dryer is used to dry furnish with less than 25% (dry basis) moisture. The moisture monitor must be calibrated based on the procedures specified by the manufacturer at least once per semiannual compliance period (or more frequently if recommended by the moisture monitor manufacturer). At least quarterly, the permittee must inspect all components of the moisture monitor for integrity and all electrical connections for continuity. The equation in 40 CFR 63.2269(c)(5) shall be used to convert percent moisture measurements wet basis to a dry basis. [40 CFR 63.2269(c)]
- b. The temperature sensor must be located in a position that provides representative temperature and has a minimum accuracy of 4°F or 0.75% of the temperature value, whichever is larger. The temperature sensor's reading must be validated at least semiannually using the requirements of 40 CFR 63.2269(b)(4). A validation check is also required any time the sensor exceeds the manufacturer's specified maximum operating temperature range or a new temperature sensor is installed. At least quarterly all components shall be inspected for integrity and all electrical connections for continuity, oxidation and galvanic corrosion. [40 CFR 63.2269(b)]
  - c. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct monitoring all times that the dryers are operating. For purposes of calculating data averages, the permittee shall not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitor malfunction is any sudden, infrequent, not reasonably preventable failure of the monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available constitutes a deviation from the monitoring requirements. [40 CFR 63.2270(b)]
  - d. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities or data recorded during periods of safety-related shutdown in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement. [40 CFR 63.2270(c)]
  - e. The 24-hour block average of all recorded readings shall be determined and calculated after every 24 hours of operation as the average of the evenly spaced recorded readings in the previous 24 operating hours (excluding periods described above). [40 CFR 63.2270(e)]
  - f. To calculate a 24-hour average, the permittee must have at least 75% of the required recorded readings that are based on valid data. [40 CFR 63.2270(f)]
46. Monitoring Requirement: The permittee shall develop and implement a Baghouse and Cyclone Operation, Monitoring and Maintenance Manual (BCOM<sup>3</sup>). The BCOM<sup>3</sup> shall include those items necessary to ensure proper function of the individual baghouses and cyclones, including the material handling and conveyance systems associated with each.



Included in the BCOM<sup>3</sup> shall be such items as instrument calibration, appropriate operating conditions, inspection requirements and frequencies, and maintenance requirements. The permittee shall monitor individual baghouses and cyclones and take actions required to ensure each unit is operated at its highest reasonable efficiency and effectiveness to minimize emissions of air contaminants. [OAR 340-226-0120(1)(a)]

- a. The BCOM<sup>3</sup> shall be reviewed and updated as needed. The BCOM<sup>3</sup> shall include the maintenance and corrective action requirements designed to ensure each baghouse is operated in compliance with Conditions 0 and 41.
- b. The BCOM<sup>3</sup> shall include procedures to minimize, to the extent practicable, the leakage of visible emissions from the baghouses and cyclones.
- c. The permittee shall develop a written startup, shutdown and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the dryers during periods of startup, shutdown and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with the permit limits.

47. Recordkeeping Requirements: The permittee will maintain the following records: [40 CFR 63.2282]

- a. A copy of each notification and report submitted to comply with 40 CFR 63, Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status;
- b. Records kept to demonstrate compliance with the SSMP prior to 8/13/21. After 8/13/21 the records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions as specified below: [40 CFR 63.2282(a)(2)]
  - i. Record the date, time and duration of each startup and/or shutdown period, including the periods when the dryers were subject to the standard applicable to startup and shutdown.
  - ii. In the event the dryers fail to meet an applicable standard, record the number of failures; for each failure record the date, time, cause and duration of each failure.
  - iii. For each failure to maintain the dryer inlet moisture and temperature within the limit in Condition 42, the permittee must maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by DEQ.
  - iv. Record actions taken to minimize emissions in accordance with Condition 42.c.
- c. Records of performance tests and performance evaluations required in 40 CFR 63.10(b)(2)(viii).
- d. Records of the dryer inlet moisture and temperature required in Condition 45;
- e. Records of all relevant inspections, repairs, replacement or other maintenance to the cyclones and baghouses;
- f. Monthly and annual productions records (1,000 ft<sup>2</sup> on a ¾" basis);



- g. Monthly and annual amount of natural gas or propane burned in the dryers (MMft<sup>3</sup>).

**Emissions Unit Line 1 & Line 2 Presses/Thermal Catalytic Oxidizers (P1, P2/TCO) Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b)	48	Visible Emissions	20% Opacity	6-Minute Block Average	NA	52, 53
340-226-0210(2)(a)(A)	49	PM	0.10 gr/dscf	Avg. of 3 Test Runs	51	52, 53
40 CFR 63.2240(b) Table 1B-option 3	50	Methanol	90% Reduction	Avg. of 3 Test Runs	51	52, 53

48. Applicable Requirement: Visible emissions from the Presses/Thermal Catalytic Oxidizer (TCO) must not equal or exceed an average opacity of 20%. [OAR 340-208-0110(3)(b)] The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24. Six-minute block averages are measured by EPA Method 9 when necessary.
49. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) from the presses/TCO in excess of 0.10 grains per dry standard cubic foot. [OAR 340-226-0210(2)(a)(A)]
50. Applicable Requirement: The permittee shall reduce methanol emissions from the Presses/TCO by 90%. [40 CFR 63.2240(b), Table 1 – Option 3]
- Prior to August 13, 2021 the methanol reduction limit does not apply during periods of press or TCO startup, shutdown and malfunction, prior to press initial startup, and during routine TCO maintenance exemptions specified in Condition 50.b. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. [40 CFR 63.2250(a)] The permittee must operate the presses and TCO during startups, shutdowns and malfunctions in accordance with a written startup shutdown and malfunction plan (SSMP) in accordance with the general duty provisions of 40 CFR 63.6(e)(1)(i) and §63.6(e)(3). [40 CFR 63.2250(b)]
  - The permittee may request a routine control device maintenance exemption for routine maintenance events such as TCO bakeouts, washouts, media replacement and replacement of corroded parts. The request must: [40 CFR 63.2251(a)]
    - justify the need for routine maintenance and the time required to accomplish the maintenance;
    - describe the maintenance activities and the frequency of the activities;

- iii. explain why maintenance cannot be accomplished during process shutdowns;
    - iv. describe how the permittee plans to make reasonable efforts to minimize emissions during the maintenance; and
    - v. provide any other documentation required by DEQ.
  - c. The routine maintenance activity must not exceed 0.5% of the annual operating uptime of the presses. [40 CFR 63.2251(b)]
  - d. If approved, the routine maintenance exemption is incorporated by reference and considered attached to this permit. [40 CFR 63.2251(c)]
  - e. To the extent practical, startup and shutdown if the TCO must be scheduled during times when the GFD is also shut down. [40 CFR 63.2251(e)]
  - f. On and after August 13, 2021 the permittee must comply with the methanol reduction limit when the press is operating except: [40 CFR 63.2250(f)]
    - i. Prior to Press/TCO initial startup;
    - ii. During safety-related shutdowns: These safety-related shutdowns shall follow documented site-specific procedures such as use of automated controls or other measures developed to protect workers and equipment to ensure that the flow of raw materials cease and that material is removed from the press as expeditiously as possible given the system design to reduce air emissions; [40 CFR 63, DDDD Table 3-item 6]
    - iii. The permittee must minimize the length of time when the methanol reduction is not met due to Condition 50.f.ii.
  - g. The permittee must always operate and maintain the presses and associated air pollution control and monitoring equipment in a manner consistent with good air pollution control practices for minimizing emissions at least to the levels required by this permit. The general duty to minimize emissions does not require making any efforts to reduce emissions if the 90% methanol emission limit has been achieved. Determination of whether a source is operating in compliance with operation and maintenance requirements will be based on information available to DEQ which 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. 2250(g)]
51. Testing Requirements: The permittee shall conduct emission factor verification tests in accordance with DEQ's Source Sampling Manual for particulate and VOC at least once during the permit term, using the following test methods: [OAR 340-212-0120] A test to demonstrate compliance with Condition 50 must be conducted by August 13, 2023 and thereafter within 60 months of the previous compliance test. [40 CFR 63, Subpart DDDD, Table 7 – Item 7]

Pollutant	Test Method
PM	DEQ Method 7
VOC	EPA Method 25A
Methanol	EPA Method 308



The permittee shall submit a report of all emission factor verification tests to DEQ within 45 days of any test. The summary shall include the following information:

- a. Process parameters during the test (production, 1000 ft<sup>2</sup> – ¾” basis/hr), press cycle time, and control device parameters such as TCO combustion chamber temperature, TCO cycle time, etc.
  - b. Emission results in lb/hr and lb/Msf-3/4” basis.
52. Monitoring Requirement: The permittee shall calibrate, maintain, operate and record the output of a continuous monitoring system for measuring the TCO combustion chamber temperature in accordance with 40 CFR 63.2269. The temperature sensor must be located in a position that provides representative temperature and has a minimum accuracy of 4°F or 0.75% of the temperature value, whichever is larger. The temperature sensor’s reading must be validated at least semiannually using the requirements of 40 CFR 63.2269(b)(4). A validation check is also required any time the sensor exceeds the manufacturer’s specified maximum operating temperature range or a new temperature sensor is installed. At least quarterly all components shall be inspected for integrity and all electrical connections for continuity, oxidation and galvanic corrosion. [40 CFR 63.2269]
- a. The 3-hour block average catalytic oxidizer temperature shall be maintained above the minimum temperature established during the methanol reduction compliance test. [40 CFR 63, Subpart DDDD, Table 2 – Item 2]
  - b. The permittee must check the activity level of a representative sample of catalyst annually except for a calendar year when a methanol reduction performance test is conducted. [40 CFR 63, Subpart DDDD, Table 2 – Item 2, Table 7 – Item 4]
  - c. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities, the permittee shall conduct monitoring all times that the presses are operating. For purposes of calculating data averages, the permittee shall not use data recorded during monitoring malfunctions, associated repairs, out-of-control periods, or required quality assurance or control activities. The permittee must use all the data collected during all other periods in assessing compliance. A monitor malfunction is any sudden, infrequent, not reasonably preventable failure of the monitor to provide valid data. Monitoring failures that are caused in part by poor maintenance or careless operation are not malfunctions. Any period for which the monitoring system is out-of-control and data are not available constitutes a deviation from the monitoring requirements. [40 CFR 63.2270(b)]
  - d. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities or data recorded during periods of safety-related shutdown, or TCO downtime covered in any approved routine control device maintenance exemption in data averages and calculations used to report emission or operating levels, nor may such data be used in fulfilling a minimum data availability requirement. [40 CFR 63.2270(c)]

- e. The 3-hour block average shall use all recorded readings, calculated after every 3 hours of operation as the average of the evenly spaced recorded readings in the previous 3 operating hours (excluding periods described above). [40 CFR 63.2270(d)]
  - f. To calculate a 3-hour average, the permittee must have at least 75% of the required recorded readings that are based on valid data. [40 CFR 63.2270(f)]
53. Monitoring Requirement: The permittee shall develop and implement a TCO Operation, Monitoring and Maintenance Manual (TCOOM<sup>3</sup>). The TCOOM<sup>3</sup> shall specify the minimum required inspection, monitoring, maintenance (including annual evaluations of catalyst activity level), trouble-shooting, training and calibration as well as procedures for managing excursions and upsets, including the allowable operating modes and ranges, as required, to ensure the TCO is operated at the highest and best practicable treatment and control. The TCOOM<sup>3</sup> shall be reviewed and updated as needed.
- The permittee shall develop a written startup, shutdown and malfunction plan (SSMP) that describes, in detail, procedures for operating and maintaining the presses and TCO during periods of startup, shutdown and malfunction; and a program of corrective action for malfunctioning process, air pollution control, and monitoring equipment used to comply with Condition 50.
- The permittee can request a routine control device maintenance exemption from EPA in accordance with 40 CFR 63.2251. If approved by EPA the exemption can be incorporated by reference and attached to this permit. [40 CFR 63.2251(c)]
54. Recordkeeping Requirements: The permittee will maintain the following records: [40 CFR 63.2282]
- a. A copy of each notification reported to comply with 40 CFR 63, Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status;
  - b. Records kept to demonstrate compliance with the SSMP prior to 8/13/21. After 8/13/21 the records related to startup and shutdown, failures to meet the standard, and actions taken to minimize emissions as specified below: [40 CFR 63.2282(a)(2)]
    - i. Record the date, time and duration of each startup and/or shutdown period, including the periods when the presses were subject to the standard applicable to startup and shutdown.
    - ii. In the event the presses fail to meet an applicable standard, record the number of failures; for each failure record the date, time, cause and duration of each failure.
    - iii. For each failure to meet an applicable standard, record and retain a list of the affected sources and equipment and the following information:
      - A. For any failure to meet the methanol reduction limit, record an estimate of the quantity of each regulated pollutant emitted over



any emission limit and a description of the method used to estimate emissions.

- B. For each failure to maintain the TCO temperature in accordance with the limit in Condition 52.a, the permittee must maintain sufficient information to estimate the quantity of each regulated pollutant emitted over the emission limit. This information must be sufficient to provide a reliable emissions estimate if requested by DEQ.
- iv. Record actions taken to minimize emissions in accordance with Condition 50.g.
- c. Documentation of any approved routine control device maintenance exemption, if requested under 40 CFR 63.2251;
- d. Records of performance tests and performance evaluations required in 40 CFR 63.10(b)(2)(viii).
- e. Records of the TCO temperature required in Condition 52.

#### Emissions Unit Board Coolers (BC1, BC2) Requirements

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b)	55	Visible Emissions	20% Opacity	6-minute block average	57	58
340-226-0210(2)(a)(B)(ii)	56	PM	0.15 gr/dscf	Avg. of 3 test runs	57	58

- 55. Applicable Requirement: Visible emissions from the board coolers must not equal or exceed an average opacity of 20% as a six-minute block average. [OAR 340-208-0110(3)(b)]
- 56. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) from the board coolers in excess of 0.15 grains per dry standard cubic foot. [OAR 340-226-0210(2)(a)(B)(ii)]
- 57. Testing Requirements: Due to limited particulate emissions from these units, DEQ is not requiring particulate testing to demonstrate compliance with the applicable limits and standards. However, if testing were performed for compliance purposes, the permittee would be required to use the test in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120]
- 58. Monitoring Requirement: The permittee must monitor visible emissions from the board coolers in accordance with the following procedures, test methods and frequencies: [OAR 340-218-0050(3)(a)]
  - a. EPA Method 9 shall be used to determine opacity. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is

calculated by summing the opacity of the 24 observations and dividing the sum by 24.

- b. EPA Method 9 tests must be conducted at a minimum of once each quarter, with at least 30 days between tests;
  - c. If, on a regularly scheduled test day, it is not possible to conduct an EPA Method 9 test due to inclement weather conditions or interference from other sources, the permittee shall note such conditions on the observation data sheet and must conduct the required monitoring within 7 days of the regularly scheduled test day. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day;
  - d. If any test shows a violation of the opacity limit, the permittee must take corrective action to remedy the violation within 30 minutes and perform daily tests until at least 5 consecutive days show emissions below the limit. After the 5-day period, the test frequency must be quarterly;
  - e. All EPA Method 9 tests shall be performed during periods that the board coolers are in operation.
59. Recordkeeping Requirements: The permittee will maintain the following records: [OAR 340-218-0050(3)(b)]
- a. Records of all relevant inspections, repairs, replacements, calibrations or other maintenance;
  - b. Monthly and annual production records (1000 ft<sup>2</sup> on a ¾" basis);
  - c. Records of all opacity observations.

#### **Emissions Unit Uncontrolled Cyclones (C4, C23) Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b)	60	Visible Emissions	20% Opacity	6-minute block average	62	63
340-226-0210(2)(a)(B)(ii)	61	PM	0.15 gr/dscf	Avg. of 3 test runs	62	63

60. Applicable Requirement: Visible emissions from C4 and C23 must not equal or exceed an average opacity of 20% on a 6-minute block average. [OAR 340-208-0110(3)(b)]
61. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) from C4 and C23 in excess of 0.15 grains per dry standard cubic foot. [OAR 340-226-0210(2)(a)(B)(ii)]
62. Testing Requirements: Due to limited particulate emissions from these units, DEQ is not requiring particulate testing to demonstrate compliance with the applicable limits and standards. However, if testing were performed for compliance purposes, the permittee would be required to use the test in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120]



63. Monitoring Requirement: The permittee must monitor visible emissions from C4 and C23 in accordance with the following procedures, test methods and frequencies: [OAR 340-218-0050(3)(a)]
- a. EPA Method 9 shall be used to determine opacity. The visible emissions standards in this condition are based on the average of 24 consecutive observations recorded at 15-second intervals, which comprise a six-minute block. Six-minute blocks need not be consecutive in time and in no case may two blocks overlap. For each set of 24 observations, the six-minute block average is calculated by summing the opacity of the 24 observations and dividing the sum by 24.
  - b. EPA Method 9 tests must be conducted at a minimum of once each quarter, with at least 30 days between tests;
  - c. If, on a regularly scheduled test day, it is not possible to conduct an EPA Method 9 test due to inclement weather conditions or interference from other sources, the permittee shall note such conditions on the observation data sheet and must conduct the required monitoring within 7 days of the regularly scheduled test day. The permittee must record in a log the reason for not conducting the test on a regularly scheduled test day;
  - d. If any test shows a violation of the opacity limit, the permittee must take corrective action to remedy the violation within 30 minutes and perform daily tests until at least 5 consecutive days show emissions below the limit. After the 5-day period, the test frequency must be quarterly;
  - e. All EPA Method 9 tests shall be performed during periods that C4 and C23 are in operation.
  - f. The permittee must complete the minimum monitoring of each cyclone as shown below:
    - i. At least monthly the permittee must visually inspect each cyclone and associated conveyance or material handling system to determine if it is operating properly, and if fugitive emissions from each unit are being adequately controlled.
    - ii. At least quarterly the permittee must visually inspect each cyclone and determine if the following devices are in good working order and functioning properly, as applicable: internal vortex breaker plate, fan motor(s), abort gate/dampers or other actuators and seals, and any alarms associated with proper function of the unit.
64. Recordkeeping Requirements: The permittee will maintain the following records: [OAR 340-218-0050(3)(b)]
- a. Records of all relevant inspections – including appropriate inspection points and allowable conditions;
  - b. Monthly and annual production records (1000 ft<sup>2</sup> on a ¾" basis);
  - c. Records of all opacity observations.

**Emissions Unit Material Handling Cyclones (C1/BH27, C2/BH2-3, C3/BH1, C11/BH4, C12/BH5, C16/BH9, C17/BH8, C18/BH17, C19/BH10, C20/BH16, C21/BH10, C22/BH14, C25/BH12, C26/BH12, C27/BH13, C28/BH20, C31/BH8, C32/BH9, C36/BH10, C37/BH13, C38/BH15, C39/BH18, C42/BH5, C43/BH19, C47/BH21, C48/BH22, C50/BH23, C51/BH30, C52/BH14, C53/BH4, C54/BH5, C55/BH31) Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-208-0110(3)(b)	65	Visible Emissions	20% Opacity	6-minute block average	67	68, 69
340-226-0210(2)(a)(B)(ii)	66.a	PM	0.15 gr/dscf for C11, C12, C16-22, C31, C32 and C36	Avg. of 3 test runs	67	68, 69
340-226-0210(2)(b)(B)	66.b	PM	0.14 gr/dscf for C1-C3, C25-C28, C37-C39, C42, C43, C47, C48, and C50-C55	avg. of 3 test runs	67	68, 69

65. Applicable Requirement: Visible emissions from C4 and C23 must not equal or exceed an average opacity of 20% as a 6-minute block average. [OAR 340-208-0110(3)(b)]
66. Applicable Requirement: The permittee shall not cause or allow the emissions of particulate matter (total) as follows:
- From C11/BH4, C12/BH5, C16-22/BH8-10, 14, 16-17, C31/BH8, C32/BH9, and C36/BH10 in excess of 0.15 grains per dry standard cubic foot. [OAR 340-226-0210(2)(a)(B)(ii)]
  - From C1/BH27, C2-3/BH1-3, C25-28/BH12, 13, 20, C37-39/BH13, 15, 18, C42/BH5, C43/BH19, C47/BH21, C48/BH22 and C50-55/BH23, 30, 14, 4, 5, 31 in excess of 0.14 grains per dry standard cubic foot. [OAR 340-226-0210(2)(b)(B)]
67. Testing Requirements: Due to limited particulate emissions from these units, DEQ is not requiring particulate testing to demonstrate compliance with the applicable limits and standards. However, if testing were performed for compliance purposes, the permittee would be required to use the test in accordance with DEQ's Source Sampling Manual. [OAR 340-212-0120]
68. Monitoring Requirement: The permittee must complete the minimum monitoring of each baghouse as stated below: [OAR 340-218-0050(3)(a)]
- At least monthly the permittee must inspect each baghouse, record the pressure drop through the baghouse and complete a visual survey of the device to determine if fugitive emissions from each unit are being adequately controlled;



- b. At least semi-annually the permittee must inspect each baghouse and determine if the following devices are working properly: sweep chains, fans and dampers, including proper fan motor balancing, abort gate/damper actuators and seals, spark detection systems, and any alarms associated with proper function of the unit;
  - c. If deficiencies are noted during any inspection, the permittee must take actions as expeditiously as possible to ensure the unit is operated in compliance with this permit.
69. Monitoring Requirement: The permittee shall develop and implement a Baghouse and Cyclone Operation, Monitoring & Maintenance Manual (BCOM<sup>3</sup>). The BCOM<sup>3</sup> shall include those items necessary to ensure proper function of the individual baghouses and cyclones, including the material handling and conveyance systems associated with each. Included in the BCOM<sup>3</sup> shall be such items as instrument calibration, appropriate operating conditions, inspection requirements and frequencies, and maintenance requirements. The permittee shall monitor individual baghouses and cyclones and take actions required to ensure each unit is operated at its highest reasonable efficiency and effectiveness to minimize emissions of air contaminants. [OAR 340-226-0120(1)(a)]
- a. The BCOM<sup>3</sup> shall be reviewed and updated as needed. The BCOM<sup>3</sup> shall include those maintenance and corrective action requirements designed to ensure each baghouse is operated in compliance with Conditions 65 and 66.
  - b. The BCOM<sup>3</sup> shall include procedures to minimize, to the extent practicable, the leakage of visible emissions from the baghouses and cyclones.
70. Recordkeeping Requirements: The permittee will maintain the following records: [OAR 340-218-0050(3)(b)]
- a. Records documenting the time and date of all relevant inspections – including appropriate inspection points and allowable conditions;
  - b. Records of maintenance activities and corrective actions taken;
  - c. Monthly and annual production records (1000 ft<sup>2</sup> on a ¾" basis) for unit C1/BH27, C2-3/BH1-3, C11/BH4, C12/BH5, C16-22/BH8-10, 14, 16, 17, C25-28/BH12, 13, 20, C31/BH8, C32/BH9, C36-39/BH10, 13, 15, 18, C42/BH5, C43/BH19, and C50-55/BH4, 5, 14, 23, 30, 31;
  - d. Monthly and annual record of material throughput (BDT) for units C47/BH21 and C48/BH22.

**Emissions Unit Particleboard Manufacturing (entire facility, excluding truck dumps, storage areas and boilers and other fuel burning equipment) Requirements**

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Averaging Time	Testing Condition	Monitoring Condition
340-234-0520(2)	71	PM	117 lb/hr	24-hour period divided by 24	NA	72

71. Applicable Requirement: Particulate matter from the entire facility, excluding the truck dumps, storage areas, and boilers and other fuel burning equipment, must not exceed 117 lb/hr. [OAR 340-234-0520(2)]
72. Monitoring Requirement: The permittee must use the parameters monitored and the emission factors listed in Condition 78.a to calculate the particulate emissions from all non-fuel burning equipment on a daily basis: [OAR 340-218-0050(3)(a)]
- a. The particulate emissions shall be calculated in pounds per hour as a 24-hour average according to the following equation:

$$E = \sum H_{eu} \times EF_{eu} + \sum \frac{D_{eu} \times EF_{eu}}{24}$$

Where:

- E = Emissions from non-fuel burning equipment (lb/hr)
- H<sub>eu</sub> = Process parameters listed in Condition 78.a for emission units C9, C10, C14, C15, P1, P2, BC1 and BC2 averaged over a 24-hour period
- D<sub>eu</sub> = Process parameters listed in Condition 78.a for emission units C1-C4, C11, C12, C16-C23, C25-C28, C31, C32, C36-C39, C42, C43, C47, C48, C50-C55 and paved roads
- EF<sub>eu</sub> = Particulate emission factors identified for each emission unit in Condition 78.a
- b. As an alternative to daily calculations, the permittee may establish maximum production rates that, if not exceeded, would ensure that the emission limitation of Condition 71 is not being exceeded. If the permittee uses this option, a record of the average daily production rates for each day of operation must be kept. In addition, the permittee must be capable of calculating emissions in accordance with this condition at any time upon request by DEQ.

### **Emission Unit Emergency Engines (ENG) Requirements**

73. Applicable Requirement: For each emergency stationary reciprocating internal combustion engines (RICE), the permittee must: [40 CFR 63.6640(f)]
- a. Change oil and filter every 500 hours of operation or annually, whichever comes first; [40 CFR 63.6603(a), Table 2d(4)(a)]
- b. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first; [40 CFR 63.6603(a), Table 2d(4)(b)]
- 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)]
74. Applicable Requirement: 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]



75. Applicable Requirement: 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)]
- a. 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)]
  - b. Operating conditions: [40 CFR 63.6640(f)(2)]
    - i. There is no time limit on the use of emergency stationary RICE in emergency situations.
    - ii. 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.
    - iii. 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.
  - c. 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)]

### **Insignificant Activities Requirements**

76. Applicable Requirement: 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:
- a. OAR 340-208-0110 (20% opacity)
  - b. OAR 340-228-0210 (0.10 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning equipment)
  - c. OAR 340-226-0210 (0.10 gr/dscf for non-fugitive, non-fuel burning equipment)

Unless otherwise specified in this permit or an applicable requirement, DEQ 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 DEQ's Source Sampling Manual.

**PLANT SITE EMISSION LIMITS**

77. 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	45	25
PM <sub>10</sub>	37	15
PM <sub>2.5</sub>	33	10
SO <sub>2</sub>	39	0
NO <sub>x</sub>	301	39
CO	90	20
VOC	342	40
GHG (CO <sub>2</sub> e) (excluding biomass CO <sub>2</sub> )	74,000	0
GHG (CO <sub>2</sub> e) (including biomass CO <sub>2</sub> )	89,924	0

- a. The permittee may only use Unassigned Emissions after any necessary construction (OAR 340-218-0190) and operating permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by DEQ. [OAR 340-222-055]
- b. Each time the permit is renewed after July 1, 2007 the unassigned emissions will be established again and reduced upon the following permit renewal to no more than the SER for each regulated pollutant. [OAR 340-222-0055(5)]
78. Monitoring Requirements: The permittee must determine compliance with the Plant Site Emission Limits established in Condition 77 by conducting monitoring and calculations for each 12-month period in accordance with the following procedures, test methods and frequencies except for GHGs:

- a. The permittee must calculate emissions using the following formula, process parameters and emission factors:

$$E = \sum P_{eu} \times EF_{eu} \times K$$

Where:

- E = Pollutant emissions in lb/month and tons/year.
- $\sum$  = Symbol representing "summation of";
- $P_{eu}$  = Process parameter identified in the table below;
- $EF_{eu}$  = Emission factor identified for each emissions unit and pollutant in the table below;
- K = Conversion constant: 1 lb/lb for monthly emissions calculations; 1 ton/2,000 lb for annual emissions calculations.





- b. The emissions factors listed in Condition 78.a. are not enforceable limits unless otherwise specified in this permit. Compliance with PSELs must only be determined by the calculations contained in this condition.

## EMISSION FEES

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

## GENERAL TESTING REQUIREMENTS

- 80. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with DEQ's Source Sampling Manual and the NESHAP regulations where applicable. [OAR 340-212-0120, 40 CFR 63.7]
  - 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 DEQ's 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.
  - 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.
  - c. Unless otherwise specified by permit condition or DEQ approved source test plan, all compliance source tests must be performed as follows:
    - i. At least 90% of the design capacity for new or modified equipment;
    - ii. At least 90% of the maximum operating rate for existing equipment; or
    - iii. 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.
  - 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.
  - 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.



## GENERAL MONITORING AND RECORDKEEPING REQUIREMENTS

### General Monitoring Requirements

81. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
82. 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)]
83. 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

84. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
  - a. The date, place as defined in the permit, and time of sampling or measurements;
  - b. The date(s) analyses were performed;
  - c. The company or entity that performed the analyses;
  - d. The analytical techniques or methods used;
  - e. The results of such analyses;
  - f. The operating conditions as existing at the time of sampling or measurement; and
  - g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drifts).
85. 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)]
86. 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)]

87. 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 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(3)(b)(B)]

## REPORTING REQUIREMENTS

### General Reporting Requirements

88. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]
- a. Immediately (within 1 hour of the event) notify DEQ of an excess emission event by phone, email or facsimile; and
  - b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]
    - 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;
    - ii. The date and time the permittee notified DEQ of the event;
    - iii. The equipment involved;
    - iv. Whether the event occurred during startup, shutdown, maintenance, or as a result of a breakdown, malfunction or emergency;
    - 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;
    - 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);
    - vii. The final resolution of the cause of the excess emissions; and
    - 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.
  - c. If there is an ongoing excess emission caused by an upset or breakdown, the permittee must immediately take action to minimize emissions by reducing or ceasing operation of the equipment or facility, unless doing so could result in physical damage to the equipment or facility, or cause injury to employees. In no case may the permittee operate more than 48 hours after the beginning of the excess emissions, unless continued operation is approved by DEQ in accordance with OAR 340-214-0330(4).



- d. 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 Emergency Response System (OERS). The current number is 1-800-452-0311.
  - e. 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.
  - f. Once DEQ approves startup/shutdown procedures, the permittee must notify DEQ of planned startup/shutdown or scheduled maintenance events only if required by permit condition or if it results in excess emissions. When notice is required by this condition, it must be made in accordance with Condition 88.a.
  - g. 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)]
89. 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 88. [OAR 340-218-0050(3)(c)(B)]
90. The permittee must report deviations from the boiler NESHAP in accordance with 40 63.7550.
91. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]
92. 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, annual reports, source test plans and reports, and applications that do not include payment to:	Submit payments for invoices, applications to modify the permit, and any other payments to DEQ's Business Office:	Submit all reports for EPA requirements to:
AQ Permit Coordinator DEQ – Eastern Region 475 NE Bellevue Dr. Suite 110 Bend, OR 97701 541-633-2021 <a href="mailto:eraqpermits@deq.state.or.us">eraqpermits@deq.state.or.us</a>	DEQ – Air Quality Division 700 NE Multnomah St., Suite 600 Portland, OR 97232 503-229-5359	US EPA Enforcement and Compliance Assurance Division Region 10 (20-C04) 1200 Sixth Avenue, Suite 155 Seattle, WA 98101

### Semi-annual and Annual Reports

93. The permittee must submit two (2) paper copies and one (1) electronic copy 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. If the report due date falls on a weekend or Monday holiday, the permittee must submit their report on the next business day. 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)]
- a. The first semi-annual report is be due on **July 30** and must include the semi-annual compliance certification, OAR 340-218-0080.
  - b. The annual report is due on **March 1** and must consist of the following:
    - i. The emission fee report; [OAR 340-220-0100]
    - ii. A summary of the excess emissions log; [OAR 340-214-0340]
    - iii. The second semi-annual compliance certification; [OAR 340-218-0080]
    - iv. Annual emissions of regulated air pollutants for which PSEs have been established for the calendar year; [OAR 340-222-0080(5)]
    - v. Annual emissions of hazardous air pollutants for the calendar year; [OAR 340-222-0080(5)] and
    - vi. Other annual reporting requirements:
      - A. Monthly and annual records of production (1,000 square feet – ¾” basis)
      - B. Monthly and annual steam production (1,000 lb)
      - C. Monthly and annual records of the amount and type of fuels used (MMft<sup>3</sup>, BDT)
      - D. Monthly and annual records of hours of TCO operation (hr)
      - E. Monthly and annual records of green furnish dried (BDT)
      - F. Monthly 12-month rolling average emissions for each criteria pollutant category (tons)



- c. The permittee must submit a semi-annual compliance report for the boiler NESHAP. The reports cover the periods from January 1 through June 30 or July 1 through December 31 of each year. [40 CFR 63.7550(b)(3)] The compliance reports must be postmarked or submitted no later than **July 31** or **January 31**, whichever date is the first date following the end of the reporting period. [40 CFR 63.7550(b)(4)] The compliance report must contain the following information: [40 CFR 63.7550(c)]
- i. Company and facility name and address;
  - ii. Boiler information, emission limitations, and operating parameter limitations;
  - iii. Date of report and beginning and ending dates of the reporting period;
  - iv. Total boiler operating times during the reporting period;
  - v. Manufacturer and model number of the COMS and the date of the last certification or audit;
  - vi. Total fuel use by each individual boiler during the reporting period including a description of the fuel;
  - vii. If conducting performance tests once every 3 years, the date of the last 2 performance tests and a statement as to whether there have been any operational changes since the last performance test that could increase emissions;
  - viii. A statement indicating that no new types of fuel are burned in the boilers. If a new fuel is burned the permittee must follow the procedures in 40 CFR 63.7550(c)(5)(viii) to determine emissions while burning the new fuel are in compliance with the emission limits. If compliance cannot be demonstrated by fuel analysis, a statement indicating the intent to conduct a new performance test within 60 days of starting to burn the new fuel must be included;
  - ix. A summary of monthly fuel analysis if fuel analysis is used to demonstrate compliance;
  - x. If there were no deviations from any emission limit or operating limit, a statement that there were no deviations;
  - xi. If there were no deviations from the monitoring requirements, including no periods during which the COMS were out of control, a statement that there were no deviations or periods when the COMS were out of control during the reporting period.
  - xii. If a malfunction occurred during the reporting period, the report must include the number, duration, and a brief description for each type of malfunction which caused or may have caused any applicable emission limitation to be exceeded. The report must include a description of actions taken to correct the malfunction;
  - xiii. Include the date of the most recent tune-up for each boiler. Include the date of the most recent burner inspection;
  - xiv. A statement by a responsible official with that official's name, title and signature certifying the truth, accuracy and completeness of the content of the report;

- xv. For each deviation from a boiler emission limit or operating limit the compliance report must contain a description of the deviation, information on the number, duration, and cause of the deviation, as well as corrective actions taken, and if the deviation occurred during an annual performance test, provide the date the annual performance test was completed. [40 CFR 63.7550(d)]
94. 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)]
- a. The identification of each term or condition of the permit that is the basis of the certification;
  - 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;
  - 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 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 and 40 CFR Part 64, occurred; and
  - d. Such other facts as DEQ may require to determine the compliance status of the source.
95. 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).



96. 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

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

Rule Citation	Summary	Reason for Not Being Applicable
OAR 340-218-0050(4)	Acid Rain Requirements	Facility is not in this source category
OAR 340-226-0300 through 0320	Process Weight Rule	Process weight rule does not apply to sources with specific emission standards. Particleboard rules in OAR 340-234-0520 apply to this facility
OAR 340-228-0300	Acid Rain Requirements	Facility is not in the source category
OAR 340-240-300 through 0360	Rules for La Grande Urban Growth Area	Facility is 3 miles outside of the La Grande Urban Growth Area
40 CFR 60.40c through 60.48c OAR 340-238-0060(3)(e)	NSPS Subpart Dc for Small Industrial Boilers	Boilers were installed prior to 6/9/89

#### 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:

- Source Sampling Manual; November 15, 2018.
- Continuous Monitoring Manual; April 16, 2015 - State Implementation Plan Volume 3, Appendix A6; and
- All state and federal regulations as in effect on the date of issuance of this permit.

##### G3. Applicable Requirements

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)(c)(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, Financial Services, 700 NE Multnomah Street, Suite #600, Portland, OR 97232, 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 340-210-0205 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:

Eastern Region – Bend Office  
475 NE Bellevue Dr., Suite 110  
Bend, OR 97701  
541-388-6146

