



State of Oregon  
Department of  
Environmental  
Quality

Permit Number: 18-0013-TV-01

Expiration Date: 02/01/2020

Page 1 of 44

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

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

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

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ISSUED TO:

Collins Products, LLC  
29100 SW town Loop W, Suite 300  
Wilsonville, OR 97070-9315

INFORMATION RELIED UPON:

Application Number: 23639  
Received: 03/25/2009

PLANT SITE LOCATION:

6410 Highway 66  
Klamath Falls, OR 97601

LAND USE COMPATIBILITY STATEMENT:

Issued by: Klamath County Planning  
Department  
Dated: 02/16/1993

ISSUED BY THE DEPARTEMENT OF ENVIRONMENTAL QUALITY

(Signature on File)  
Mark W. Bailey, Eastern Region Air Quality Manager

January 26, 2015  
Date

Nature of Business  
Reconstituted Wood Products

SIC  
2493

NAICS  
321219

RESPONSIBLE OFFICIAL

Name: Eric Schooler  
Title: President and CEO

FACILITY CONTACT PERSON

Name: Jess Brown  
Title: Environmental Manager  
Phone: (503) 471-2250

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

ACDP	Air Contaminant Discharge Permit	MMSF	Million Square Feet
Act	Federal Clean Air Act	MSF	Thousand Square Feet
ASTM	American Society of Testing and Materials	N <sub>2</sub> O	Nitrous Oxide (greenhouse gas)
BDT	Bone Dry Ton	NA	Not Applicable
Btu	British thermal unit	NO <sub>x</sub>	Nitrogen Oxides
CFR	Code of Federal Regulations	O <sub>2</sub>	Oxygen
CH <sub>4</sub>	Methane (greenhouse gas)	OAR	Oregon Administrative Rules
CO	Carbon Monoxide	ODEQ	Oregon Department of Environmental Quality
CO <sub>2</sub>	Carbon Dioxide (greenhouse gas)	ORS	Oregon Revised Statutes
CO <sub>2</sub> e	Carbon Dioxide Equivalent (greenhouse gases)	O&M	Operation and Maintenance
CPMS	Continuous Parameter Monitoring System	Pb	Lead
DEQ	Department of Environmental Quality	PCD	Pollution Control Device
dscf	dry standard cubic feet	PCWP	Plywood and Composite Wood Products
EF	Emission Factor	PM	Particulate Matter
EPA	US Environmental Protection Agency	PM <sub>10</sub>	Particulate Matter less than 10 microns in size
EU	Emissions Unit	PM <sub>2.5</sub>	Particulate Matter less than 2.5 microns in size
FCAA	Federal Clean Air Act	ppm	parts per million
FSA	Fuel Sampling and Analysis	PSEL	Plant Site Emission Limit
gr/dscf	grain per dry standard cubic feet (1 pound = 7000 grains)	psia	pounds per square inch, actual
GHG	Greenhouse Gases	SERP	Source Emissions Reduction Plan
GWP	Global Warming Potential (greenhouse gases)	SO <sub>2</sub>	Sulfur Dioxide
HAP	Hazardous Air Pollutant as defined by OAR 340-244-0040	ST	Source Test
HCFC	Halogenated Chloro-Fluoro-Carbons	VE	Visible Emissions
ID	Identification Number or Label	VMT	Vehicle Miles Traveled
I&M	Inspection and Maintenance	VOC	Volatile Organic Compounds
MMft <sup>3</sup>	Million Cubic Feet		

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

Opacity must be measured in accordance with EPA Method 9. For all standards, the minimum observation period must be six minutes, though longer periods may be required by a specific rule or permit condition. Aggregate times (e.g., 3 minutes in any one hour) consist of the total duration of all readings during the observation period that are equal to or greater than the opacity percentage in the standard, whether or not the readings are consecutive. Each EPA Method 9 reading represents 15 seconds of time. [See also definition of “Opacity” in OAR 340-208-0010]

## 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 as specified below:
  - 2.a. Conditions 5, 6, 9, 10, 11, 12, 13, G5 and G9 (OAR 340-248-0005 through 340-248-0180) are only enforceable by the state. [OAR 340-218-0060]
  - 2.b. Attachment 1 of this permit provides a cross-reference for SIP and Title V program rules that have been renumbered in the current Oregon Administrative Rules. [OAR 340-218-0060 and 340-218-0070]

## 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)]:

Facility	Emission Unit Description	Device Description	EU ID	Pollution Control Device Description	PCD ID
Particleboard	Particleboard Press	Press and unloader fans	PB01	Biofilter	PB45
		Trim saw vent	PB03	None	None
	Dryers	Core dryers	PB05	Bagfilter	PB3, PB4
		Surface dryer	PB06	Bagfilter	PB44
	Material Handling	Cyclones	PB07 PB08	None	None
		Cyclones with primary filters	PB09	Bagfilter	PB38, 40-43
		Cyclones with secondary filters	PB10	Bagfilter	PB29,35,36, 37,P2,3
		Storage piles	PB11	Fugitive Control Plan	None
		Secondary screen with primary filter	PB12	Bagfilter	PB39
Hardboard	Defibrator/dryers	Defibrators/dryers/cyclones	HB01– HB03	Biofilter	HB50
			HB04	Bagfilter/biofilter	HB46/HB50
	Bake oven	Bake oven	HB08	RCO	RCO
		Bake oven roof vents	HB09	None	None
	Material Handling	Cyclone HB7	HB10	None	None
		Cyclones HB 19, 20, 21	HB11	Bagfilter	HB41, HB42
		Cyclones HB8-12, 16, 18	HB12	None	None
		Cyclones HB15, 25, 26, 30	HB13	Bagfilter	HB40, 45, 47
		Cyclones HB23, 31, 32, 44	HB14	None	None
		Cyclone HB27	HB15	None	None
	Press	Press area vents	HB16	Biofilter	HB50
	Coating Ovens	ovens - natural gas fired	HB17	None	None
	Coating Operations	Miscellaneous coating	HB18	None	None

Facility	Emission Unit Description	Device Description	EU ID	Pollution Control Device Description	PCD ID
All	Unpaved Roads	Fugitive dust	Un-paved Roads	Fugitive control plan	Work Practices
	Aggregate Insignificant	Miscellaneous processes	AI	None	None

## 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 Emission Limits and Standards

Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Requirement	Monitoring Condition
340-208-0210(2)	4	Fugitive emissions	Fugitive Control Plan/Minimize Emissions	Visual Survey	8
340-240-0520	6				
340-234-0520(1)(a) & 234-0530(1)(a)]	5				
ACDP Condition 16	7				
340-240-0530	9	Operation and Maintenance	O&M Plan	Review plan periodically	10
340-208-0300	11	Air contaminants	Not cause a nuisance	Complaint investigation	13
340-208-0450	12	PM >250 $\mu$	No observable deposition off site	Complaint investigation	13
340-228-0110(1)	14	ASTM Grade 1 distillate fuel oil	<0.3% Sulfur by weight	Vendor certificate or analysis	15 & 16
340-228-0110(2)		ASTM Grade 2 distillate fuel oil and used oil	<0.5% Sulfur by weight		
40 CFR Part 68	17	Risk management	Risk management plan	NA	17
40 CFR Part 63, Ssubpart DDDD	18	General compliance provisions			

### Fugitive Emissions

4. Applicable Requirement: The permittee must not allow or permit any materials to be handled, transported or stored; or a building, its appurtenances, or a road to be used, constructed, altered, repaired or demolished; or any equipment to be operated, without taking reasonable precautions to prevent particulate matter from becoming airborne. Such reasonable precautions must include, but not be limited to the following: [OAR 340-208-0210(2)]
  - 4.a. Use, where possible, of water or chemicals for control of dust in the demolition of existing buildings or structures, construction operations, the grading of roads or the clearing of land;
  - 4.b. Application of asphalt, oil, water, or other suitable chemicals on unpaved roads, materials stockpiles, and other surfaces which can create airborne dusts;

- 4.c. Full or partial enclosure of materials stockpiles in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
  - 4.d. Installation and use of hoods, fans and fabric filters to enclose and vent the handling of dusty materials;
  - 4.e. Adequate containment during sandblasting or other similar operations; and
  - 4.f. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne.
5. Applicable Requirement: The permittee shall enclose all truck dump and storage areas holding or intending to hold raw materials to prevent windblown particle emissions from these areas from being deposited upon property not under the ownership of the permittee. [OAR 340-234-0520(1)(a) and 234-0530(1)(a)]
- 5.a. The temporary storage of raw materials outside the regularly used areas of the plant site is prohibited unless the permittee first notifies the Department and receives written approval. [OAR 340-234-0520(1)(b) and 234-0530(1)(b)]
  - 5.b. If the permittee desires to control windblown particulate emissions from truck dump and storage areas other than by enclosure, the permittee shall first apply to the Department for authorization to utilize alternative controls. [OAR 340-234-0520(1)(c) and 234-0530(1)(c)]
6. Applicable Requirements: The permittee must prepare and implement a site-specific plan for the control of fugitive emissions. [OAR 340-240-0520]
- 6.a. Fugitive emission-control plans must identify reasonable measures to prevent particulate matter from becoming airborne, and avoid the migration of material onto the public road system. Such reasonable measures may include, but are not limited to the following: [OAR 340-240-0520]
    - 6.a.i. Paving all roads and areas on which vehicular traffic occurs at the facility;
    - 6.a.ii. Scheduled application of water, or other suitable chemicals on unpaved roads, log storage or sorting yards, materials stockpiles, and other surfaces which can create airborne dust. Dust suppressant material must not adversely affect water quality;
    - 6.a.iii. Periodic sweeping or cleaning of paved roads and other areas as necessary to prevent migration of material onto the public road system;
    - 6.a.iv. Full or partial enclosure of materials stockpiled or other best management practices in cases where application of oil, water, or chemicals are not sufficient to prevent particulate matter from becoming airborne;
    - 6.a.v. Installation and use of hoods, fans, and fabric filters to enclose and vent the handling of dusty materials;
    - 6.a.vi. Adequate containment during sandblasting or other similar operations;
    - 6.a.vii. Covering, at all times when in motion, open bodied trucks transporting materials likely to become airborne; and
    - 6.a.viii. Procedures for the prompt removal of earth or other material from paved streets.
    - 6.a.ix. Reasonable measures may include landscaping and using vegetation to reduce the migration of material onto public and private roadways or from becoming airborne.
  - 6.b. The facility owner or operator must supervise and control fugitive emissions and material that may become airborne caused by the activity of outside contractors delivering or removing materials at the site.
7. Applicable Requirement: The Fugitive Control Plan shall be reviewed by the permittee at least annually and revised, if the work practices change. Revision does not constitute a reopening of this permit. In addition to the measures identified in Condition 6, the plan must include, at a minimum, provisions for the following: [OAR 340-208-0210(2), ACDP Condition 16]
- 7.a. Road sweeping: A vacuum sweeper shall be used on paved or chip sealed roads during dry weather (May through October) no less than 3 times per week in areas of high traffic and areas of dust accumulation. Mechanical breakdown of the sweeper shall exempt the permittee from this requirement only as repairs are made in a timely manner.

- 7.b. Conduct monthly inspection of plant roof-top areas and grounds surrounding the manufacturing areas for the accumulation of particulate matter. Areas of accumulated fugitive particulate shall be cleaned up as needed year round, prior to the next monthly inspection.
  - 7.c. Collected material from air pollution control equipment shall be kept in a covered container or other method equally effective in preventing the material from becoming airborne during storage and transfer, and inspected for system integrity on a weekly basis.
8. 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. The person conducting the observation does not have to be EPA Method 9 certified. However, the individual should be familiar with the procedures of EPA Method 9, including using the proper location to observe visible emissions. If sources of visible emissions are identified, the permittee must: [OAR 340-218-0050(3)(a)]
- 8.a. Immediately take corrective action to minimize the fugitive emissions, including but not limited to those actions identified in Conditions 4, 6 and 5; or
  - 8.b. Conduct a Modified EPA Method 9 (see page 2 of the permit) test within 24 hours;
  - 8.c. Recordkeeping:
    - 8.c.i. The permittee must maintain records of the fugitive emissions surveys, corrective actions (if necessary), and/or the results of any modified EPA Method 9 tests.
    - 8.c.ii. The permittee must maintain records of the vacuum sweeping operation, monthly inspections, and weekly inspections required by Conditions 7.a, 7.b, and 7.c.

### Operation and Maintenance Plan

9. Applicable Requirement: The permittee must prepare and implement an Operation and Maintenance Plan (O&M Plan) for non-fugitive sources of particulate matter. [OAR 340-240-0530]
- 9.a. The purpose of the operation and maintenance plan is to:
    - 9.a.i. Reduce the number of upsets and breakdowns in particulate control equipment;
    - 9.a.ii. Reduce the duration of upsets and downtimes; and
    - 9.a.iii. Improve the efficiency of control equipment during normal operations.
  - 9.b. The operation and maintenance plan should consider, but not be limited to, the following:
    - 9.b.i. Personnel training in operation and maintenance;
    - 9.b.ii. Preventative maintenance procedures, schedule and records;
    - 9.b.iii. Logging of the occurrence and duration of all upsets, breakdowns and malfunctions which result in excessive emissions;
    - 9.b.iv. Routine follow-up evaluation of upsets to identify the cause of the problem and changes needed to prevent a recurrence;
    - 9.b.v. Periodic source testing of pollution control units as required by the permit;
    - 9.b.vi. Inspection of internal wear points of pollution control equipment during scheduled shutdowns; and
    - 9.b.vii. Inventory of key spare parts.
10. Monitoring Requirement: The permittee must maintain the O&M Plan on site and review the plan periodically to ensure that it remains current. [OAR 340-218-0050(3) and 340-240-0530]

### Nuisance Conditions

11. Applicable Requirement: The permittee must not cause or allow air contaminants from any source to cause a nuisance. Nuisance conditions will be verified by Department personnel. [OAR 340-208-0300] This condition is enforceable only by the State.

12. Applicable Requirement: The permittee must not cause or permit the emission of any particulate matter larger than 250 microns in size at sufficient duration or quantity, as to create an observable deposition upon the real property of another person. The Department will verify that the deposition exists and will notify the permittee that the deposition must be controlled. [OAR 340-208-0450] This condition is enforceable only by the State.
13. Monitoring Requirement: The permittee must maintain a log of each nuisance complaint received by the permittee during the operation of the facility. Documentation must include date of contact, time of observed nuisance condition, description of nuisance condition, location of receptor, status of plant operation during the observed period, and time of response to complainant. A plant representative must immediately investigate the condition following the receipt of the nuisance complaint and a plant representative must provide a response to the complainant within 24 hours, if possible. [OAR 340-218-0050(3)(a)] This condition is only enforceable by the state.

### **Fuels**

14. Applicable Requirement: The permittee must not use any distillate fuel oil containing more than the following percentages of sulfur:
- 14.a. 0.3% sulfur by weight for ASTM Grade 1 distillate oil; [OAR 340-228-0110(1)]
- 14.b. 0.5% sulfur by weight for ASTM Grade 2 distillate oil; [OAR 340-228-0110(2)]
15. Monitoring Requirement: The permittee shall monitor the sulfur content of oil (used, ASTM Grade 1, or ASTM Grade 2) used at the facility in equipment other than rolling stock: [OAR 340-218-0050(3)(a)]
- 15.a. Obtain a sulfur analysis certificate from the vendor for each batch of oil received; or
- 15.b. Analyze or have analyzed by a contract laboratory a monthly composite of representative samples taken by the permittee of the oil used at the facility. Liquid fuels shall be analyzed using ASTM D129-64, D1552-83, D4057-81 or equivalent.
16. Recordkeeping Requirement: The permittee shall maintain records of the distillate fuel sulfur content.

### **Accidental Release Prevention**

17. 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]

### **Plywood and Composite Wood Products NESHAP (Subpart DDDD)**

18. Applicable requirement:
- 18.a. The process units must be in compliance with the compliance options, operating requirements, and the work practice requirements in Conditions 25, 26, 29, 30, 43, 44 and 46 at all times, except during periods of process unit or control device startup, shutdown and malfunction; prior to process unit initial startup; and during the routine control device maintenance exemption specified in § 63.2251, if applicable. The compliance options, operating requirements, and work practice requirements do not apply during times when the process unit(s) subject to the compliance options, operating requirements, and work practice requirements are not operating, or during periods of startup, shutdown and malfunction. Startup and shutdown periods must not exceed the minimum amount of time necessary for these events. [40 CFR 63.2250(a)]

- 18.b. The permittee must always operate and maintain the affected source, including air pollution control and monitoring equipment, according to the provisions in 40 CFR 63.6(e)(1)(i). [40 CFR 63.2250(b)]
- 18.c. The permittee must develop a written startup, shutdown and malfunction plan (SSMP) according to the provisions in 40 CFR 63.6(e)(3). [40 CFR 63.2250(c)]
- 18.d. The General Provisions of 40 CFR Part 63 are incorporated by reference as specified in Table 10 of Subpart DDDD. [40 CFR 63.2290]
- 18.e. The permittee must keep the following records: [40 CFR 63.2282(a)]
- 18.e.i. A copy of each notification and report submitted to comply with 40 CFR Part 63, Subpart DDDD, including all documentation supporting any Initial Notification or Notification of Compliance Status that was submitted, according to the requirements in 40 CFR 63.10(b)(2)(xiv).
- 18.e.ii. The records in 40 CFR 63.6(e)(3)(iii) through (v) related to startup, shutdown and malfunction.
- 18.e.iii. Documentation of the approved routine control device maintenance exemption, if such an exemption is requested under 40 CFR 63.2251.
- 18.e.iv. Records of performance tests and performance evaluations as required in 40 CFR 63.10(b)(2)(viii).

#### Particle Board Plant Emission Limits and Standards

Emission Unit	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Condition
PB01-PB10, PB12	340-208-0110(2) and 340-240-0510 (1)	19	Visible Emissions	20% opacity, 3 min. aggregate in 60 minutes	20
PB01-PB10, PB12	340-226-0210(1)(b)	21	PM	0.1 gr/dscf, avg. of 3 test runs	20 and 22
PB01-PB04, PB06-PB10, PB12	340-234-0520(2)(a)	23	PM	3 lbs/1,000 ft <sup>2</sup> , 3/4"	24
PB01 and PB02	40 CFR 63.2240	25	HAP	Compliance options	28
	40 CFR 63.2240(b)	26	HAP	Capture efficiency	28
	40 CFR 63.2240	29	HAP	Biofilter temperature operating limit	32
PB05	40 CFR 63.2241(a)	30	HAP	Dryer inlet temperature and furnish moisture content work practice requirements	32
PB06	40 CFR 63.2240(a)	27	HAP	0.26 lb/ODT	31-33

19. Applicable Requirement: The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions units PB01 through PB12 for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [OAR 340-208-0110(2) and 340-240-0510(1)]
20. Monitoring and Recordkeeping Requirement(s): The permittee shall monitor visible emissions from the emission points listed in the table below in accordance with the following procedures, test methods and frequencies: [OAR 340-218-0050(3)(a)]
- 20.a. Modified EPA Method 9 shall be used to determine opacity in accordance with the Department's Source Sampling Manual. Each Modified EPA Method 9 test shall be a minimum of 6 minutes long unless any one reading is greater than the emissions limit for the emissions unit, then the observation period shall be 60 minutes or until a violation of the applicable limit in Condition 19 has been documented, whichever period is shorter.

- 20.b. The permittee shall use the following methods and monitoring schedule for conducting the visible emissions tests:

Emissions Unit	Test Method	Frequency
PB01/PB45 Biofilter (press area and unloader)	Modified EPA Method 9	Weekly
PB03 (board side and end trim saws), PB04 (board cooler vents), PB05 (core dryers), PB06 (surface dryers), PB07 (cyclone PB22), PB08 (cyclone PB24), PB09 (cyclones with primary filters), PB10 (cyclones with secondary filters), PB12 (secondary screen with primary filter)	Modified EPA Method 9	At least once during each semi-annual compliance certification period with at least 30 days between observations

- 20.c. If the observer is unable to conduct the Modified EPA Method 9 tests due to visual interference caused by other visible emissions sources (e.g. fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain, or snow, the observer shall note such conditions on the data observation sheet and make at least three attempts to conduct the surveys or tests at approximately 2 hour intervals. If no observations are made for that day, the observer shall continue to attempt to conduct the Modified EPA Method 9 daily until a valid observation is possible.
- 20.d. If any test shows a violation of the applicable limits in Condition 19, the permittee shall:
- 20.d.i. Take corrective action to remedy the violation within 30 minutes; and
- 20.d.ii. Perform daily tests until at least 5 consecutive days show emissions below the limits. After the 5 day period, the test frequency shall be weekly or semi-annually, depending on the frequency being followed before the exceedance.
- 20.e. The permittee shall record in a log book the date and time of the observations, the operating conditions during the observations, the results of the observations, and the corrective action (if performed).
21. Applicable Requirement: The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grain per standard cubic foot from emission units PB01 through PB10. [OAR 340-226-0210(1)(b)]
22. Monitoring and Recordkeeping Requirement(s): [OAR 340-218-0050(3)(a)]
- 22.a. At least once each calendar year, all baghouses shall be inspected for physical degradation that could affect the performance of the control device, including but not limited to any individual bags that are found to be blinded, missing or damaged to the extent that they are no longer effective. The permittee shall make all necessary repairs to the baghouses to ensure efficient operation. Inspection and repair activities should be included in a log.
- 22.b. The permittee shall maintain pressure drop monitoring devices on baghouses PB3 and PB4 in accordance with the manufacturer's written instructions. [OAR 340-212-0200 through 0280]
- 22.b.i. The permittee shall take corrective action if pressure drop is less than 0.1 inches H<sub>2</sub>O or greater than 5 inches H<sub>2</sub>O other than during startup and shutdown.
- 22.b.ii. Real time data shall be displayed continuously when the units are in operation. The permittee shall then monitor and record the pressure drop for each baghouse at least one time each day.
- 22.b.iii. All excursions of the parametric action levels and the corrective action taken to return the control devices to highest and best practicable treatment and control shall be recorded in a maintenance log.
- 22.b.iv. An exceedance of the parametric action level operating ranges is not necessarily a violation of the particulate matter emission standard.
23. Applicable Requirement: The permittee shall not cause or allow the emission of particulate matter in excess of 57.6 lbs/hr, for any 24 hour average period, from all sources in emissions units PB01-PB10 and

PB12 (the Particleboard Plant, excluding fuel burning equipment, truck dump and storage area and refuse burning equipment). [OAR 340-234-0520(2)(a)]

24. Monitoring and Recordkeeping Requirement(s): The permittee shall calculate the hourly combined PM emissions from PB01 through PB10 and PB12 within 10 days after each day of operation, as follows: [OAR 340-218-0050(3)(a)]

The particulate emissions shall be calculated in pounds per hour according to the following equation:

$$E = \Sigma[(P_{\max}/T) \times EF_{eu}]$$

Where:

E	=	Combined particulate emissions (lbs/hr)
P <sub>max</sub>	=	Daily production/throughput for emission units PB01 through PB03, PB05 through PB10 and PB12
Ef <sub>eu</sub>	=	Emission factors identified for emission PB01 through PB03, PB05 through PB10 and PB12 listed in Condition 61
T	=	Hours of operation in a day

#### **Plywood and Composite Wood Products NESHAP (Subpart DDDD)**

25. Applicable Requirement: Emissions from the particleboard press, loader, unloader, and board separator (PB01) must meet one of the following compliance options using an add-on control system: [40 CFR 63.2240(b), table 1B]
- 25.a. Reduce emissions of total HAP, measured as THC (as carbon), by 90 percent; or
  - 25.b. Limit emissions of total HAP, measured as THC (as carbon), to 20 ppmvd; or
  - 25.c. Reduce methanol emissions by 90 percent; or
  - 25.d. Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
  - 25.e. Reduce formaldehyde emissions by 90 percent; or
  - 25.f. Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.
26. Applicable Requirement: If using one of the emission concentration compliance options (Condition 25.b, 25.d or 25.f), there must be a capture device that meets the definition of wood products enclosure in 40 CFR 63.2292 or achieves a capture efficiency of greater than or equal to 95 percent. [40 CFR 63.2240(b)]
27. Applicable Requirement: Total HAP emissions from the surface dryer (PB06) must not exceed 0.26 lb/ODT. [CFR 63.2240(a), Table 1A]
28. Performance Testing: The biofilter must be tested within 2 years following the previous performance test and within 180 days after each replacement of any portion of the biofilter media or each replacement of more than 50 percent (by volume) of the biofilter media with the same type of media. [40 CFR 63.2271]
- 28.a. The tests must be conducted using the methods specified in Table 4 of 40 CFR Part 63, Subpart DDDD. [40 CFR 63.2262(a)]
  - 28.b. The tests must not be conducted during periods of startup, shutdown or malfunction. [40 CFR 63.2262(b)(1)]
  - 28.c. The tests must be conducted under representative operating conditions as defined in 40 CFR 62.2292. The operating conditions during the test must be described in the performance test report for the process and control system and explain why they are representative. [40 CFR 63.2262(b)(2)]

- 28.d. Three separate test runs must be conducted for each performance test. Each test run must last at least 1 hour except testing of an enclosure conducted using the alternative tracer gas method in Appendix A of 40 CFR Part 63, which requires a minimum of three separate runs of at least 20 minutes each. [40 CFR 63.2262(c)]
- 28.e. Sampling sites must be located at the inlet (if emission reduction testing or documentation of inlet methanol or formaldehyde concentration is required) and outlet of the control device (defined in 40 CFR 63.2292) and prior to any releases to the atmosphere. For control sequences with wet control devices (defined in 40 CFR 63.2292) followed by control devices (defined in 40 CFR 63.2292), sampling sites may be located at the inlet and outlet of the control sequence and prior to any releases to the atmosphere. [40 CFR 63.2262(d)]
- 28.f. The permittee must collect operating parameter monitoring system or continuous emissions monitoring system (CEMS) data at least every 15 minutes during the entire performance test and determine the parameter or concentration value for the operating requirement during the performance test using the methods specified in Condition 28.a. [40 CFR 63.2262(e)]
- 28.g. All nondetect data (defined in 40 CFR 63.2292) must be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbons (THC) emission rates. [40 CFR 63.2262(g)(1)]
- 28.h. When complying with any of the compliance options based on percent reduction across a control system as part of the performance test, the percent reductions must be calculated using the following equation: [40 CFR 63.2262(h)]

$$PR = CE * (ER_{in} - ER_{out})/ER_{in}$$

Where:

- PR = Percent reduction (%);
- CE = Capture efficiency (percent) determined for reconstituted wood product presses and board coolers as required in Table 4 of 40 CFR Part 63, Subpart DDDD;
- ER<sub>in</sub> = Emission rate of total HAP (calculated as the sum of the emission rate of acetaldehyde, acrolein, formaldehyde, methanol, phenol, and propionaldehyde), THC, formaldehyde, or methanol in the inlet vent stream of the control device (lbs/hr);
- ER<sub>out</sub> = Emission rate of total HAP (calculated as the sum of the emission rate of acetaldehyde, acrolein, formaldehyde, methanol, phenol and propionaldehyde), THC, formaldehyde or methanol in the outlet vent stream of the control device (lbs/hr)

- 28.i. During the performance test, the permittee must continuously monitor the biofilter bed temperature during each of the required 1-hour test runs. To monitor biofilter bed temperature, the permittee may use multiple thermocouples in representative locations throughout the biofilter bed and calculate the average biofilter bed temperature across these thermocouples prior to reducing the temperature data to 15-minute averages for purposes of establishing biofilter bed temperature limits. The biofilter bed temperature range must be established as the minimum and maximum 15-minute biofilter bed temperatures monitored during the three test runs. The permittee may base the biofilter bed temperature range on values recorded during previous performance tests provided that the data used to establish the temperature ranges have been obtained using the test methods required in this condition. If using data from previous performance tests, the permittee must certify that the biofilter and associated process unit(s) have not been modified subsequent to the date of the performance tests. Replacement of the biofilter media with the same type of material is not considered a modification of the biofilter for purposes of this sub-condition. The permittee may expand the biofilter bed temperature operating range by submitting the notification specified in Condition 81 and conducting a repeat performance test that demonstrates compliance with the applicable compliance options of this subpart. [40 CFR 63.2262(m)(1) and (2)]

29. Applicable Requirement: **For the biofilter, the 24-hour block average bed temperature must be maintained within a range of 62 to 90°F established in accordance with Condition 28.i.** [40 CFR 63.2240] The permittee may expand the biofilter bed temperature operating range by submitting the notification specified in Condition 81 and conducting a repeat performance test that demonstrates compliance with the applicable compliance options of Condition 25.a. The expanded parameter range will take effect upon filing the notice unless and until DEQ objects to the expanded range. [40 CFR 63.2262(m)(3)]
30. Applicable Requirement: **For the dry rotary dryers (PB05 core dryers at the particleboard plant), the 24-hour block average moisture content of the process furnish must be less than or equal to 30 percent (by weight); and, the 24-hour block average inlet dryer temperature must be less than or equal to 600°F.** [40 CFR 63.2241(a)]
31. Applicable Requirement: **For the surface dryers (PB06 at the particleboard plant), the 24-hour block average moisture content of the process furnish must be less than or equal to 20 percent (by weight); and, the 24-hour block average outlet dryer temperature must be less than or equal to 90°F.** [40 CFR 63.2240(a), Table 2(5)]
32. Compliance Monitoring: The permittee must install, operate and maintain a continuous parameter monitoring system (CPMS) for measuring the biofilter bed temperature, dry rotary dryer inlet temperature, dry rotary dryer furnish moisture content, surface dryer inlet temperature, and surface dryer furnish moisture content. [Table 4 of 40 CFR Part 63, Subpart DDDD, 40 CFR 63.2269(a), and 63.2270(a)]
- 32.a. The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing and recording) for each successive 15-minute period. [40 CFR 63.2269(a)(1)]
- 32.b. At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 63.2269(a)(2)]
- 32.c. The permittee must record the results of each inspection, calibration and validation check. [40 CFR 63.2269(a)(3)]
- 32.d. For each temperature monitoring device, permittee must: [40 CFR 63.2269(b)]
- 32.d.i. Locate the temperature sensor in a position that provides a representative temperature of the dryer inlet.
- 32.d.ii. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger.
- 32.d.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F.
- 32.d.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor's reading.
- 32.d.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- 32.d.vi. At least quarterly, inspect all components for integrity and all electrical connections for continuity, oxidation and galvanic corrosion. [40 CFR 63.2269(b)(6)]
- 32.e. For each furnish moisture meter, the permittee must: [40 CFR 63.2269(c)]
- 32.e.i. Use a continuous moisture meter with a minimum accuracy of 5 percent (dry basis) moisture or better in the 15 to 25 percent (dry basis) moisture content range. Alternatively, the permittee may use a continuous moisture monitor with a minimum accuracy of 5 percent (dry basis) moisture or better for dry rotary dryers used to dry furnish with less than 25 percent dry basis moisture.
- 32.e.ii. Locate the moisture monitor in a position that provides a representative measure of

furnish moisture.

- 32.e.iii. Calibrate the moisture monitor based on the procedures specified by the moisture monitor manufacturer at least once per semiannual compliance period (or more frequently if recommended by the manufacturer).
- 32.e.iv. At least quarterly, inspect all components of the moisture monitor for integrity and all electrical connections for continuity.
- 32.e.v. Use the following equation to convert moisture measurements wet basis to a dry basis:

$$MC_{\text{dry}} = 100 \times (MC_{\text{wet}}/100)/(1-(MC_{\text{wet}}/100))$$

Where:

- $MC_{\text{dry}}$  = Percent moisture content of wood material weight (weight percent, dry basis)
- $MC_{\text{wet}}$  = Percent moisture content of wood material (weight percent, wet basis)

- 32.f. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must 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 monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring 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 for required calculations constitutes a deviation from the monitoring requirements. [40 CFR 63.2270(b)]
  - 32.g. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown and malfunction; or data recorded during periods of control device 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, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control system. [40 CFR 63.2270(c)]
  - 32.h. The permittee must determine the 24-hour block average of all recorded temperature and moisture readings, 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 in Conditions 32.f and 32.g. [40 CFR 63.2270(e)]
  - 32.i. To calculate the data averages for each 24-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in Conditions 32.f and 32.g. [40 CFR 63.2270(f)]
33. Recordkeeping: [40 CFR 63.2282(b)]
- 33.a. The permittee must keep the records of the biofilter bed temperature required to show continuous compliance with the biofilter operating requirement.
  - 33.b. The permittee must keep records of the dryer inlet temperature and furnish moisture content for the core dryers (PB05).
  - 33.c. The permittee must keep records of the dryer inlet temperature and furnish moisture content for the surface dryers (PB06).

**Hardboard Plant Emission Limits and Standards**

EU ID	Applicable Requirement	Condition Number	Pollutant/Parameter	Limit/Standard	Monitoring Condition
HB01-HB04, HB08-HB17	340-208-0110(2) and 340-240-0510(1)	34	Visible Emissions	20% opacity, 3 min. aggregate in 60 minutes	35
HB01-HB04, HB08-HB17	340-226-0210(1)(b)	36	PM	0.1 gr/dscf, avg. of 3 test runs	35, 37, 38, 39, 40
HB01-HB16	340-234-0530(2)(b)(B)	41	PM	1.4 lbs/1,000 ft <sup>2</sup> , 1/8"	42
HB01-HB04 and HB16	40 CFR 63.2240	43	HAP	Compliance options	45
	40 CFR 63.2240(b)	44	HAP	Capture efficiency	45
	40 CFR 63-2240	46	HAP	Biofilter temperature operating limit	49
HB08	40 CFR 63.2240	43	HAP	Compliance options	45
	40 CFR 63-2240	47	HAP	RCO minimum operating temperature	49

34. Applicable Requirement: The permittee shall not cause or allow the emissions of any air contaminant into the atmosphere from emissions units HB01 through HB17 for a period or periods aggregating more than three minutes in any one hour which is equal to or greater than 20% opacity, excluding uncombined water. [OAR 340-208-0110(2) and 340-240-0510(1)]

35. Monitoring and Recordkeeping Requirement(s): The permittee shall monitor visible emissions from the emission points listed in the table below in accordance with the following procedures, test methods and frequencies: [OAR 340-218-0050(3)(a)]

- 35.a. Modified EPA Method 9 shall be used to determine opacity in accordance with the Department's Source Sampling Manual. Each Modified EPA Method 9 test shall be a minimum of 6 minutes long unless any one reading is greater than the emissions limit for the emissions unit, then the observation period shall be 60 minutes or until a violation of the applicable limit in Condition 34 has been documented, whichever period is shorter.
- 35.b. The permittee shall use the following methods and monitoring schedule for conducting the visible emissions tests:

Emissions Unit	Test Method	Frequency
HB01 – HB04 and HB16 (HB50 biofilter - existing and future defibrators, press, loader, and unloader)	Modified EPA Method 9	Weekly
HB09 (bake oven/dehumidifier roof vents), HB10 (Cyclone HB7), HB12 (cyclones HB8-12, 16, 18), HB14 (cyclones HB23, 31, 32, 44), HB15 (cyclone HB27), HB17 (coating ovens)	Modified EPA Method 9	At least once during each semi-annual compliance certification period with at least 30 days between observations

- 35.c. For areas with multiple vents, the observer may identify a vent with the highest visible emissions from the area and conduct the Modified EPA Method 9 observations on that vent instead of taking readings from each vent. If the visible emissions from the selected vent are less than the standard, then monitoring of other vents is not required during the observation period. If the visible

- emissions from the selected vent are greater than the standard, then the observer must take readings from all of the vents in the area.
- 35.d. If the observer is unable to conduct the Modified EPA Method 9 tests due to visual interference caused by other visible emissions sources (e.g. fugitive emissions during high wind conditions) or due to weather conditions such as fog, heavy rain or snow, the observer shall note such conditions on the data observation sheet and make at least three attempts to conduct the surveys or tests at approximately 2 hour intervals. If no observations are made for that day, the observer shall continue to attempt to conduct the Modified EPA Method 9 daily until a valid observation is possible.
  - 35.e. If any test shows a violation of the applicable limits in Condition 34 the permittee shall:
    - 35.e.i. Take corrective action to remedy the violation within 30 minutes; and
    - 35.e.ii. Perform daily tests until at least 5 consecutive days show emissions below the limits. After the 5 day period, the test frequency shall be weekly or semi-annually, depending on the frequency being followed before the exceedance.
  - 35.f. The permittee shall record in a log book the date and time of the surveys, the results of the surveys, and the corrective action, if performed.
36. Applicable Requirement: The permittee shall not cause or allow the emission of particulate matter in excess of 0.1 grain per standard cubic foot from emission units HB01 through HB17. [OAR 340-226-0210(1)(b)]
37. Monitoring and Recordkeeping Requirement(s): The permittee must inspect all baghouses (HB40, HB41, HB42, HB45 and HB47) at least annually and make repairs or perform maintenance as necessary to maintain optimum baghouse collection efficiency. Records of the inspections and any repairs or maintenance shall be maintained in a baghouse inspection logbook. [OAR 340-218-0050(3)(a)]

#### **Emission Unit Bake Oven (Bake HB08)**

38. Monitoring Requirement: The permittee must monitor emissions from the Bake Oven (HB08), in accordance with the following procedures, test methods and frequencies: [OAR 340-212-0200 through 0280]
- 38.a. For the regenerative catalytic/thermal oxidizer (RCO), the permittee must implement a RCO Operation, Monitoring & Maintenance Plan. The plan must be based on information provided by GeoEnergy. The plan includes those inspection, monitoring, maintenance and instrument calibration requirements as well as appropriate procedures covering allowable operating modes, troubleshooting and corrective actions, continuous parameter monitoring system operation and air upset reporting that will ensure air contaminant generating processes and all air contaminant control equipment are at full efficiency and effectiveness, so that the emissions of air contaminants are kept at the lowest practicable levels. [OAR 340-234-0510 (1)(e)] The plan must be reviewed at least annually and updated as needed.
  - 38.b. Continuous parameter monitoring system (CPMS):
    - 38.b.i. The permittee must calibrate, maintain, operate and record the output of a CPMS for measuring the RCO pressure at the inlet damper to the unit in accordance with the vendors written recommendations and instructions. Real time data must be displayed each minute and the average hourly pressure recorded for every hour that the Bake Oven (HB08) is in operation. The permittee must also periodically test an alarm system to ensure that operators are made aware of the fact that the RCO is being operated outside an acceptable range, as defined here:
    - 38.b.ii. **An excursion is defined as operating the RCO at a pressure measured at the inlet damper to the unit, which is outside the range of -2.0 to -6.0, inches of water.**
    - 38.b.iii. For an excursion from the allowable inlet pressure, the permittee must take corrective action as expeditiously as practical. All corrective actions taken must be documented by date, time, corrective action taken and person taking the action.

- 38.b.iv. Minimum data availability must be 90% for any day, month and year. Monitor data availability must be determined excluding periods of calibrations, startup, shutdown and routine maintenance.
  - 38.b.v. All excursions from the allowable inlet pressure and the corrective action(s) taken to return the RCO to its highest and best practicable treatment and control must be recorded in a RCO operating and corrective action log.
  - 38.b.vi. An exceedance of the allowable inlet pressure is not necessarily a violation of the particulate matter emission standard.
39. Maintenance Requirements: The maintenance program for the RCO must include at a minimum: [OAR 340-226-0120 (1)(a)]
- 39.a. Actions the permittee must take to ensure RCO is operated at its highest reasonable efficiency and effectiveness to minimize emissions of air contaminants.
  - 39.b. The installation, testing and calibration procedures for such devices as the natural gas burner and natural gas use meter, combustion chamber temperature thermocouple, and the device for measuring the pressure at the RCO inlet damper.
40. Recordkeeping Requirements: The permittee must implement a recordkeeping program. Supporting information includes all calibration and maintenance records and all original strip-chart recordings for CPMS systems, etc., and copies of all reports required by the permit. At a minimum, the following records must be kept: [OAR 340-218-0050(3)(b)]
- 40.a. Records documenting the date and time of all inspections-including appropriate inspection points and allowable conditions.
  - 40.b. Records showing maintenance and calibration of moisture, temperature and humidity sensors, electronic actuator switches, and others as applicable. Records must be kept showing sensors or switches calibrated (or replaced), method used, date of calibration and who completed the required calibration.
  - 40.c. Records showing dates when door seals, moisture sensors, steam control valves and electronic actuator valves were replaced.
  - 40.d. Corrective action logs, as applicable.
  - 40.e. Air upset or excess emissions logs, as applicable.
  - 40.f. RCO combustion chamber temperature, (°F, hourly average - see Conditions 47 and 49).
  - 40.g. Pressure measured at the inlet damper, (hourly average).
  - 40.h. Records showing monthly and year to date material throughput, (MSF, 1/8 basis).

### **Hardboard Plant**

41. Applicable Requirement: The permittee shall not cause or allow the emission of particulate matter in excess of 105.4 lbs/hr, or 1.4 lbs/1000 ft<sup>2</sup>, 1/8" basis, for any 24 hour average period, from all sources in emissions units HB01 through HB16 (the Hardboard Plant, except fuel burning equipment, truck dump and storage area and refuse burning equipment). [OAR 340-234-0520(2)(a)]
42. Monitoring and Recordkeeping Requirement(s): The permittee shall calculate the hourly combined PM emissions from HB01 through HB16 within 10 days after each day of operations, as follows: [OAR 340-218-0050(3)(a)]

The particulate emissions shall be calculated in pounds per hour according to the following equation:

$$E = \Sigma[(P_{\max}/T) \times EF_{eu}]$$

Where:

E	=	Combined particulate emissions (lbs/hr)
P <sub>max</sub>	=	Daily production/throughput for emission units HB01 through HB16
Ef <sub>eu</sub>	=	Emission factors identified for emission units HB01 through HB16 listed in Condition 61.
T	=	Hours of operation in a day

#### **Plywood and Composite Wood Products NESHAP (Subpart DDDD)**

43. Applicable Requirement: Emissions from the hardboard press and defibrator/dryers (HB01 through HB04 and HB16) and bake oven (HB08) must meet one of the following compliance options using an add-on control system: [40 CFR 63.2240(b)]
  - 43.a. Reduce emissions of total HAP, measured as THC (as carbon), by 90 percent; or
  - 43.b. Limit emissions of total HAP, measured as THC (as carbon), to 20 ppmvd; or
  - 43.c. Reduce methanol emissions by 90 percent; or
  - 43.d. Limit methanol emissions to less than or equal to 1 ppmvd if uncontrolled methanol emissions entering the control device are greater than or equal to 10 ppmvd; or
  - 43.e. Reduce formaldehyde emissions by 90 percent; or
  - 43.f. Limit formaldehyde emissions to less than or equal to 1 ppmvd if uncontrolled formaldehyde emissions entering the control device are greater than or equal to 10 ppmvd.
44. Applicable Requirement: If using one of the emission concentration compliance options (Condition 43.b, 43.d or 43.f), there must be a capture device that meets the definition of wood products enclosure in 40 CFR 63.2292 or achieves a capture efficiency of greater than or equal to 95 percent. [40 CFR 63.2240(b)]
45. Performance Testing: The biofilter must be tested within 2 years following the previous performance test and within 180 days after each replacement of any portion of the biofilter media or each replacement of more than 50 percent (by volume) of the biofilter media with the same type of media. [40 CFR 63.2271]
  - 45.a. The tests must be conducted using the methods specified in Table 4 of 40 CFR Part 63, Subpart DDDD. [40 CFR 63.2262(a)]
  - 45.b. The tests must not be conducted during periods of startup, shutdown or malfunction. [40 CFR 63.2262(b)(1)]
  - 45.c. The tests must be conducted under representative operating conditions as defined in 40 CFR 62.2292. The operating conditions during the test must be described in the performance test report for the process and control system and explain why they are representative. [40 CFR 63.2262(b)(2)]
  - 45.d. Three separate test runs must be conducted for each performance test. Each test run must last at least 1 hour except testing of an enclosure conducted using the alternative tracer gas method in Appendix A of 40 CFR Part 63, which requires a minimum of three separate runs of at least 20 minutes each. [40 CFR 63.2262(c)]
  - 45.e. Sampling sites must be located at the inlet (if emission reduction testing or documentation of inlet methanol or formaldehyde concentration is required) and outlet of the control device (defined in 40 CFR 63.2292) and prior to any releases to the atmosphere. For control sequences with wet control devices (defined in 40 CFR 63.2292) followed by control devices (defined in 40 CFR 63.2292), sampling sites may be located at the inlet and outlet of the control sequence and prior to any releases to the atmosphere. [40 CFR 63.2262(d)]

- 45.f. The permittee must collect operating parameter monitoring system or continuous emissions monitoring system (CEMS) data at least every 15 minutes during the entire performance test and determine the parameter or concentration value for the operating requirement during the performance test using the methods specified in Condition 45.a. [40 CFR 63.2262(e)]
- 45.g. All nondetect data (defined in 40 CFR 63.2292) must be treated as one-half of the method detection limit when determining total HAP, formaldehyde, methanol, or total hydrocarbons (THC) emission rates. [40 CFR 63.2262(g)(1)]
- 45.h. When complying with any of the compliance options based on percent reduction across a control system as part of the performance test, the percent reductions must be calculated using the following equation: [40 CFR 63.2262(h)]

$$PR = CE * (ER_{in} - ER_{out}) / ER_{in}$$

Where:

- PR = Percent reduction (%);
- CE = Capture efficiency (%) - determine for reconstituted wood product presses and board coolers as required in Table 4 of 40 CFR Part 63, Subpart DDDD;
- ER<sub>in</sub> = Emission rate of total HAP (calculated as the sum of the emission rate of acetaldehyde, acrolein, formaldehyde, methanol, phenol and propionaldehyde), THC, formaldehyde or methanol in the inlet vent stream of the control device (lbs/hr);
- ER<sub>out</sub> = Emission rate of total HAP (calculated as the sum of the emission rate of acetaldehyde, acrolein, formaldehyde, methanol, phenol and propionaldehyde), THC, formaldehyde or methanol in the outlet vent stream of the control device (lbs/hr)

- 45.i. During the performance test, the permittee must continuously monitor the biofilter bed temperature during each of the required 1-hour test runs. To monitor biofilter bed temperature, the permittee may use multiple thermocouples in representative locations throughout the biofilter bed and calculate the average biofilter bed temperature across these thermocouples prior to reducing the temperature data to 15-minute averages for purposes of establishing biofilter bed temperature limits. The biofilter bed temperature range must be established as the minimum and maximum 15-minute biofilter bed temperatures monitored during the three test runs. The permittee may base the biofilter bed temperature range on values recorded during previous performance tests provided that the data used to establish the temperature ranges have been obtained using the test methods required in this condition. If using data from previous performance tests, the permittee must certify that the biofilter and associated process unit(s) have not been modified subsequent to the date of the performance tests. Replacement of the biofilter media with the same type of material is not considered a modification of the biofilter for purposes of this sub-condition. [40 CFR 63.2262(m)(1) and (2)]
46. **Applicable Requirement: For the biofilter, the 24-hour block average bed temperature must be maintained within a range of 91 to 119°F established in accordance with Condition 45.i.** [40 CFR 63.2240] The permittee may expand the biofilter bed temperature operating range by submitting the notification specified in Condition 81 and conducting a repeat performance test that demonstrates compliance with the applicable compliance options of Condition 43. The expanded parameter range will take effect upon filing the notice unless and until DEQ objects to the expanded range. [40 CFR 63.2262(m)(3)]
47. **Applicable Requirement: For the RCO on the bake oven, the 3-hour block average temperature must be maintained above 847°F.** [40 CFR 63.2240] The permittee may establish a different minimum catalytic oxidizer temperature by submitting the notification specified in Condition 81 and conducting a repeat performance test in accordance with 40 CFR 63.2262(l) that demonstrates compliance with the

applicable compliance options of Condition 43. The minimum catalytic oxidizer temperature will take effect upon filing the notice unless and until DEQ objects to the minimum temperature. [40 CFR 63.2262(l)(2)]

48. Applicable Requirement: For the RCO on the bake oven, the permittee must check the activity level of a representative sample of the catalyst at least every 12 months and take any necessary corrective action to ensure that the catalyst is performing within its design range. [40 CFR 63.2271(a) and Table 7 of 40 CFR Part 63, Subpart DDDD]
49. Compliance Monitoring: The permittee must install, operate and maintain a continuous parameter monitoring system (CPMS) for measuring the biofilter bed temperature and bake oven RCO temperature. [Table 7 of 40 CFR Part 63, Subpart DDDD, 40 CFR 63.2269(a), and 63.2270(a)]
- 49.a. The CPMS must be capable of completing a minimum of one cycle of operation (sampling, analyzing and recording) for each successive 15-minute period. [40 CFR 63.2269(a)(1)]
- 49.b. At all times, the permittee must maintain the monitoring equipment including, but not limited to, maintaining necessary parts for routine repairs of the monitoring equipment. [40 CFR 63.2269(a)(2)]
- 49.c. The permittee must record the results of each inspection, calibration and validation check. [40 CFR 63.2269(a)(3)]
- 49.d. For each temperature sensor, the permittee must: [40 CFR 63.2269(b)]
- 49.d.i. Locate the temperature sensor in a position that provides a representative temperature of the biofilter.
- 49.d.ii. Use a temperature sensor with a minimum accuracy of 4°F or 0.75 percent of the temperature value, whichever is larger.
- 49.d.iii. If a chart recorder is used, it must have a sensitivity with minor divisions not more than 20°F.
- 49.d.iv. Perform an electronic calibration at least semiannually according to the procedures in the manufacturer's owner's manual. Following the electronic calibration, the permittee must conduct a temperature sensor validation check in which a second or redundant temperature sensor placed nearby the process temperature sensor must yield a reading within 30°F of the process temperature sensor's reading.
- 49.d.v. Conduct calibration and validation checks any time the sensor exceeds the manufacturer's specified maximum operating temperature range or install a new temperature sensor.
- 49.d.vi. At least quarterly, the permittee must inspect all components for integrity and all electrical connections for continuity, oxidation and galvanic corrosion. [40 CFR 63.2269(b)(6)] Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must 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 monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring 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 for required calculations, constitutes a deviation from the monitoring requirements.
- 49.e. Except for, as appropriate, monitor malfunctions, associated repairs, and required quality assurance or control activities (including, as applicable, calibration checks and required zero and span adjustments), the permittee must conduct all monitoring in continuous operation at all times that the process unit is operating. For purposes of calculating data averages, the permittee must

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 monitoring malfunction is any sudden, infrequent, not reasonably preventable failure of the monitoring 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 for required calculations constitutes a deviation from the monitoring requirements. [40 CFR 63.2270(b)]

- 49.f. The permittee may not use data recorded during monitoring malfunctions, associated repairs, and required quality assurance or control activities; data recorded during periods of startup, shutdown and malfunction; or data recorded during periods of control device 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, if applicable. The permittee must use all the data collected during all other periods in assessing the operation of the control system. [40 CFR 63.2270(c)]
- 49.g. For the RCO, the permittee must determine the 3-hour block average of all recorded temperature 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 in Conditions 49.e and 49.f. [40 CFR 63.2270(d)]
- 49.h. For the biofilter, the permittee must determine the 24-hour block average of all recorded temperature readings, 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 in Conditions 49.e and 49.f. [40 CFR 63.2270(e)]
- 49.i. To calculate the data averages for each 3-hour or 24-hour averaging period, the permittee must have at least 75 percent of the required recorded readings for that period using only recorded readings that are based on valid data (i.e., not from periods described in Conditions 49.e and 49.f. [40 CFR 63.2270(f)]
50. **Recordkeeping:** The permittee must keep records of the biofilter bed temperature and RCO temperature required to show continuous compliance with the temperature operating requirements. [40 CFR 63.2282(b)]

#### **Surface Coating of Wood Building Products NESHAP (Subpart QQQQ):**

51. The affected source is the collection of all of the items listed in 51.a through 51.d that are used for surface coating of wood building products within each subcategory. [40 CFR 63.4682(b)]
- 51.a. All coating operations as defined in 40 CFR 63.4781;
- 51.b. All storage containers and mixing vessels in which coatings, thinners and cleaning materials are stored or mixed;
- 51.c. All manual and automated equipment and containers used for conveying coatings, thinners and cleaning materials; and
- 51.d. All storage containers and all manual and automated equipment and containers used for conveying waste materials generated by a coating operation.
52. The permittee must limit organic HAP emissions to the atmosphere from the affected source to the applicable limit specified in the following table during each 12-month compliance period: [40 CFR 63.4690(b)]

Coating Products Subcategory	Organic HAP Limit (lb/gal solids)	Collins Operation
1. Exterior siding and primed doorskins	0.6	Yes
2. Flooring	0.78	
3. Interior wall paneling or tileboard	1.53	Yes

4. Other interior panels	0.17	Yes
5. Doors, windows and miscellaneous	1.93	

- 52.a. The permittee must include all coatings, thinners and cleaning materials used in the affected source when determining whether the organic HAP emission rate is equal to or less than the applicable limit in Condition 52. To make this determination, the permittee must demonstrate that the organic HAP content of each coating used in the coating operation(s) is less than or equal to the applicable emission limit in Condition 52, and that each thinner, and cleaning materials used contain no organic HAP. [paraphrased from 40 CFR 63.4691 and 63.4691(a) for compliant material option]
- 52.b. The permittee must be in compliance with the emission limitations in Condition 52 at all times. [40 CFR 63.4700(a)(1)]
- 52.c. The permittee must always operate and maintain the affected source, including all air pollution control and monitoring equipment used for purposes of complying with the limits in Condition 52 according to the provisions in 40 CFR 63.6(e)(1)(i). [40 CFR 63.4700(b)]
53. General Provisions: The NESHAP General Provisions (40 CFR Part 63, Subpart A) that apply to surface coating of wood products are incorporated by reference. [40 CFR 63.4701]
54. Notifications: The permittee must submit the notifications in 63.7(b)( and (c), 63.8(f)(4), and 63.9(b) through (e) and (h) that apply to the affected source by the dates specified in those sections. [40 CFR 63.4710(a)]
55. Testing: The permittee must use the compliant material option for each individual coating operation. The permittee must meet all of the requirements in this condition. To demonstrate initial compliance using the compliant material option, the coating operation or group of coating operations must use no coating with an organic HAP content that exceeds the applicable emission limit in Condition 52 and must use no thinner or cleaning material that contains organic HAP as determined according to this condition. Any coating operation for which the permittee uses the compliant material option is not required to meet the operating limits or work practice standards required in 40 CFR 63.4692 and 63.4693, respectively. To demonstrate initial compliance with the emission limitations using the compliant material option, the permittee must meet all the requirements of this condition for the coating operations using this option. Use the procedures in this condition on each coating, thinner and cleaning material in the condition it is in when it is received from its manufacturer or supplier and prior to any alteration. The permittee does not need to re-determine the organic HAP content of coatings, thinners and cleaning materials that are reclaimed on-site and reused in the coating operation(s) for which the permittee uses the compliant material option, provided these materials in their condition as received were demonstrated to comply with the compliant material option. If the mass fraction of organic HAP of a coating equals zero, determined according to Condition 55.a, and the permittee use the compliant material option, the permittee is not required to comply with Conditions 55.b and 55.c for that coating. [paraphrased from 40 CFR 63.4741 because the permittee will only use the compliance material option for complying with the NESHAP]
- 55.a. The permittee must determine the mass fraction of organic HAP for each coating, thinner and cleaning material used during the compliance period by using one of the following options: [40 CFR 63.4741(a)]
- 55.a.i. The permittee may use Method 311 for determining the mass fraction of organic HAP. Use the following procedures when performing a Method 311 test. If these values cannot be determined using Method 311, the permittee must submit an alternative technique for determining the values for approval by the EPA.
- 55.a.i.A. Count each organic HAP that is measured to be present at 0.1 percent by mass or more for Occupational Safety and Health Administration (OSHA) defined carcinogens as specified in 20 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more for other compounds. For example, if toluene (not an OSHA carcinogen) is measured to be 0.5 percent of

- the material by mass, the permittee does not have to count it. Express the mass fraction of each organic HAP you count as a value truncated to four places after the decimal (e.g., 0.379178412 truncates to 0.3791)
- 55.a.i.B. Calculate the total mass fraction of organic HAP in the test material by adding up the individual organic HAP mass fractions and truncating the result to three places after the decimal (e.g., 0.763).
- 55.a.ii. For coatings, the permittee may use Method 24 to determine the mass fraction of nonaqueous volatile matter and use that value as a substitute for mass fraction of organic HAP. [Note: Method 24 is not appropriate for those coatings with a water content that would result in an effective detection limit greater than the applicable emission limit.]
- 55.a.iii. The permittee may use an alternative test method for determining the mass fraction of organic HAP once EPA has approved it. The permittee must follow the procedure in 40 CFR 63.7(f) to submit an alternative test method for approval.
- 55.a.iv. The permittee may rely on information other than that generated by the test methods specified in Conditions 55.a.i through 55.b.ii, such as manufacturer's formulation data, if it represents each organic HAP that is present at 0.1 percent by mass or more for OSHA defined carcinogens as specified in 29 CFR 1910.1200(d)(4) and at 1.0 percent by mass or more other compounds. For example, if toluene (not an OSHA defined carcinogen) is 0.5 percent of the material by mass, the permittee does not have to count it. For reactive adhesives in which some of the HAP react to form solids and are not emitted to the atmosphere, the permittee may rely on manufacturer's data that expressly states the organic HAP or volatile matter mass fraction emitted. If there is disagreement between such information and results of a test conducted according to Conditions 55.a.i through 55.b.ii, then the test method results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.
- 55.a.v. Solvent blends may be listed as single components for some materials in data provided by manufacturers or suppliers. Solvent blends may contain organic HAP which must be counted toward the total organic HAP mass fraction of the materials. When test data and manufacturer's data for solvent blends are not available, the permittee may use the default values for the mass fraction of organic HAP in these solvent blends listed in the following tables (A and B). If the permittee uses the tables, the permittee must use the values in Table A for all solvent blends that match Table A, and the permittee may use Table B only if the solvent blends in the materials the permittee uses do not match any of the solvent blends in Table A and the permittee knows only whether the blend is aliphatic or aromatic. However, if the results of a Method 311 (Appendix A to 40 CFR Part 63) test indicate higher values than those listed in Tables A or B, the Method 311 results will take precedence unless, after consultation, the permittee demonstrates to the satisfaction of the enforcement agency that the formulation data are correct.
- 55.b. The permittee must determine the volume fraction of coating solids (gallon of coating solids per gallon of coating) for each coating used during the compliance period by a test, by one of the methods specified in Condition 55.b.i through 55.b.ii. [40 CFR 63.4741(b)]
- 55.b.i. The permittee may use ASTM Method D2697-86 (re-approved 1998), "Standard Test Method for Volume Nonvolatile Matter in Clear or Pigmented Coatings" (incorporated by reference, see 40 CFR 63.14) or ASTM Method D6093-97, "Standard Test Method for Percent Volume Nonvolatile Matter in Clear or Pigmented Coatings Using a Helium Gas Pycnometer" (incorporated by reference, see 40 CFR 63.14), to determine the volume fraction of coating solids for each coating. Divide the nonvolatile volume percent obtained with the methods by 100 to calculate volume fraction of coating solids. If these values cannot be determined using these methods, the permittee may submit an alternative technique for determining their values for approval by EPA.

- 55.b.ii. The permittee may obtain volume fraction of coating solids for each coating from the supplier or manufacturer.
- 55.b.iii. If the volume fraction of coating solids cannot be determined using the options in Conditions 55.b.i or 55.b.ii, the permittee must determine it using the following equation:

$$V_s = 1 - \frac{m_{\text{volatiles}}}{D_{\text{avg}}}$$

Where:

- $V_s$  = Volume fraction of coating solids, gallon coating solids per gallon coating
- $m_{\text{volatiles}}$  = Total volatile matter content of the coating, including HAP, volatile organic compounds (VOC), water, and exempt compounds, determined according to Method 24 in Appendix A of 40 CFR Part 60, grams volatile matter per liter coating.
- $D_{\text{avg}}$  = Average density of volatile matter in the coating, grams volatile matter per liter volatile matter, determined from test results using ASTM Method D1475-90, information from the supplier or manufacturer of the material, or reference sources providing density or specific gravity data for pure materials. If there is disagreement between ASTM Method D1475-90 test results and other information sources, the test results will take precedence.

- 55.c. Determine the density of each coating used during the compliance period from test results using ASTM Method D1475-90 or information from the supplier or manufacturer of the material. If there is disagreement between ASTM Method D1475-90 test results and the supplier's or manufacturer's information, the test results will take precedence. [40 CFR 63.4741(c)]
- 55.d. Calculate the organic HAP content, lb of organic HAP per gallon coating solids, of each coating used during the compliance period using the following equation: [40 CFR 63.4741(d)]

$$H_c = \frac{(D_c)(W_c)}{V_s}$$

Where:

- $H_c$  = Organic HAP content of the coating, lb organic HAP per gallon coating solids used.
- $D_c$  = Density of coating, lb per gallon coating, determined according to Condition 55.c.
- $W_c$  = Mass fraction of organic HAP in the coating, lb organic HAP per pound coating, determined according to Condition 55.a.
- $V_s$  = Volume fraction of coating solids, gallon coating solids per gallon coating, determined according to Condition 55.b.

- 55.e. The organic HAP content for each coating used during the initial compliance period, determined using the equation in Condition 55.d, must be less than or equal to the applicable emission limit in Condition 52; and each thinner and cleaning material used during the initial compliance period must contain no organic HAP, determined according to Condition 55.a. The permittee must keep all records required by Condition 57. As part of the notification of compliance status, the permittee must identify the coating operation(s) for which the permittee used the compliant material option and submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the initial compliance period because the permittee used no coatings for which the organic HAP content exceeded the applicable emission limit in Condition

52, and the permittee used no thinners or cleaning materials that contained organic HAP, determined according to the procedures in Condition 55.a. [40 CFR 63.4741(e)]

56. Compliance Monitoring: The permittee must demonstrate continuous compliance as follows: [40 CFR 63.4742]
- 56.a. For each compliance period to demonstrate continuous compliance, the permittee must use no coating for which the organic HAP content determined using the equation in Condition 55.d exceeds the applicable emission limit in Condition 52 and use no thinner or cleaning material that contains organic HAP, determined according to Condition 55.a. A compliance period consists of 12 months. Each month, after the end of the initial compliance, is the end of a compliance period consisting of that month and the preceding 11 months.
  - 56.b. If the permittee chooses to comply with the emission limitations by using the compliant material option, the use of any coating, thinner or cleaning material that does not meet the criteria specified in Condition 56.a is a deviation from the emission limitations that must be reported as specified in Conditions 54 and 82.
  - 56.c. As part of each semiannual compliance report required by Condition 82, the permittee must identify the coating operation(s) for which the permittee used the compliance material option. If there were no deviations from the emission limitations in Condition 52, submit a statement that the coating operation(s) was (were) in compliance with the emission limitations during the reporting period because the permittee used no coating for which the organic HAP content exceeded the applicable emission limit in Condition 52, and the permittee used no thinner or cleaning material that contained organic HAP, determined according to Condition 55.a.
57. Recordkeeping: The permittee must collect and keep records of the data and information required by this condition. Failure to collect and keep these records is a deviation from the applicable standard.
- 57.a. A copy of each notification and report that the permittee submitted to comply with the Surface Coating of Miscellaneous Metal Parts and Wood Products NESHAPs (40 CFR Part 63, Subpart QQQQ). [40 CFR 63.4730(a)]
  - 57.b. A current copy of information provided by materials suppliers or manufacturers, such as manufacturer's formulation data, or test data used to determine the mass fraction of organic HAP and density for each coating, thinner and/or other additive, and cleaning material, and the volume fraction of coating solids for each coating. If the permittee conducted testing to determine mass fraction of organic HAP, density or volume fraction of coating solids, the permittee must keep a copy of the complete test report. If the permittee uses the information provided by the manufacturer or supplier of the material that was based on testing, the permittee must keep the summary sheet of results provided to the permittee by the manufacturer or supplier. The permittee is not required to obtain the test report or other supporting documentation from the manufacturer or supplier. [40 CFR 63.4730(b)]
  - 57.c. For each compliance period, the permittee must keep the following records:
    - 57.c.i. A record of the coating operations on which the permittee used each compliance option and the time periods (beginning and ending dates and times) for each option the permittee used. [40 CFR 63.4730(c)(1)]
    - 57.c.ii. For the compliant material option, a record of the calculation of the organic HAP content for each coating, using Equation 2 of 40 CFR 63.3941. [40 CFR 63.4730(c)(2)]
  - 57.d. A record of the name and volume of each coating, thinner and/or other additive, and cleaning material used during each compliance period. If the permittee is using the compliance material option for all coatings at the source, the permittee may maintain purchase records for each material used rather than a record of the volume used. [40 CFR 63.3930(d) and 63.4730(d)]
  - 57.e. A record of the mass fraction of organic HAP for each coating, thinner and/or other additive, and cleaning material used during each compliance period unless the material is tracked by weight. [40 CFR 63.4730(e)]

- 57.f. A record of the volume fraction of coating solids for each coating used during each compliance period. [40 CFR 63.4730(f)]
- 57.g. The permittee must keep records of the date, time and duration of each deviation. [40 CFR 63.4730(j)]
- 57.h. The records must be in a form suitable and readily available for expeditious review, according to 40 CFR 63.10(b)(1). Where appropriate, the records may be maintained as electronic spreadsheets or as a database. [40 CFR 63.4731]
- 57.i. As specified in 40 CFR 63.10(b)(1), the permittee must keep each record for 5 years following the date of each occurrence, measurement, maintenance, corrective action, report or record. The permittee must keep each record on-site for at least 2 years after the date of each occurrence, measurement, maintenance, corrective action, report or record according to 40 CFR 63.10(b)(1). The permittee must keep the records off-site for the remaining 3 years.

### Insignificant Activities Requirements

- 58. The Department 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:

- 58.a. OAR 340-208-0110 (20% opacity)
- 58.b. OAR 340-228-0210 (0.1 gr/dscf corrected to 12% CO<sub>2</sub> or 50% excess air for fuel burning equipment)
- 58.c. OAR 340-226-0210 (0.1 gr/dscf for non-fugitive, non-fuel burning equipment)
- 58.d. OAR 340-226-0310 (process weight limit for non-fugitive, non-fuel burning process equipment)

Unless otherwise specified in this permit or an applicable requirement, the Department is not requiring any testing, monitoring, recordkeeping or reporting for the applicable emissions limits and standards that apply to IEUs. However, if testing were performed for compliance purposes, the permittee would be required to use the test methods identified in the definitions of “opacity” and “particulate matter” in OAR 340-208-0010 and perform the testing in accordance with the Department’s Source Sampling Manual.

- 59. The stationary emergency generator and fire water pump reciprocating internal combustion engines (RICE) are subject to the following requirements: [40 CFR 63.6603(a), 63.6625(f), 63.6640(a), and 63.6640(f)(2)]
  - 59.a. For the emergency stationary RICE, the permittee must:
    - 59.a.i. Change oil and filter every 500 hours of operation or annually, whichever comes first [40 CFR 63. 6603(a), Table 2d(4)(a)], unless an oil analysis program is performed as described in 40 CFR 63.6625(j);
    - 59.a.ii. Inspect air cleaner every 1,000 hours of operation or annually, whichever comes first, and replace as necessary; [40 CFR 63. 6603(a), Table 2d(4)(b)]
    - 59.a.iii. Inspect all hoses and belts every 500 hours of operation or annually, whichever comes first, and replace as necessary; and, [40 CFR 63. 6603(a), Table 2d(4)(c)]
    - 59.a.iv. 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. [40 CFR 63. 6603(a), Table 2d]
  - 59.b. 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)]
  - 59.c. The permittee must operate and maintain the stationary RICE according to the manufacturer’s emission related operation and maintenance instructions or develop and follow the permittee’s own maintenance plan which must provide to the extent practicable for the maintenance and operation of the engine in a manner consistent with good air pollution control practice for minimizing emissions. [40 CFR 63.6640(a), Table 6(9)]

- 59.d. Operating Conditions: The permittee must operate the emergency stationary RICE according to the following requirements. In order for the engine to be considered an emergency stationary RICE, any operation other than emergency operation, maintenance and testing, emergency demand response, and operation in nonemergency situations for 50 hours per year, as follows, is prohibited. If not operating the engine according to the following requirements, the engine will not be considered an emergency engine and must meet all requirements for non-emergency engines: [40 CFR 63.6640(f)(2)]
- 59.d.i. There is no time limit on the use of emergency stationary RICE in emergency situations.
- 59.d.ii. The permittee may operate the emergency stationary RICE for any combination of the following purposes for a maximum of 100 hours per calendar year. Any operation for non-emergency situations as allowed by Condition 59.d.iii counts as part of the 100 hours per calendar year allowed by this Condition.
- 59.d.ii.A. Emergency stationary RICE may be operated for maintenance checks and readiness testing, provided that the tests are recommended by federal, state or local government, the manufacturer, the vendor, the regional transmission organization or equivalent balancing authority and transmission operator, or the insurance company associated with the engine. The permittee may petition EPA for approval of additional hours to be used for maintenance checks and readiness testing, but a petition is not required if the permittee maintains records indicating that federal, state or local standards require maintenance and testing of emergency RICE beyond 100 hours per calendar year.
- 59.d.ii.B. Emergency stationary RICE may be operated for emergency demand response for periods in which the Reliability Coordinator under the North American Electric Reliability Corporation (NERC) Reliability Standard EOP-002-3, Capacity and Energy Emergencies, or other authorized entity as determined by the Reliability Coordinator, has declared an Energy Emergency Alert Level 2 as defined in the NERC Reliability Standard EOP-002-3.
- 59.d.ii.C. Emergency stationary RICE may be operated for periods where there is a deviation of voltage or frequency of 5 percent or greater below standard voltage or frequency.
- 59.d.iii. Emergency stationary RICE may be operated for up to 50 hours per calendar year in non-emergency situations. The 50 hours of operation in non-emergency situations are counted as part of the 100 hours per calendar year for maintenance and testing and emergency demand response provided in Condition 59.d.ii. Except as follows, the 50 hours per year for nonemergency situations cannot be used for peak shaving or non-emergency demand response, or to generate income for a facility to an electric grid or otherwise supply power as part of a financial arrangement with another entity.
- 59.d.iii.A. Prior to May 3, 2014, the 50 hours per year for non-emergency situations can be used for peak shaving or nonemergency demand response to generate income for a facility, or to otherwise supply power as part of a financial arrangement with another entity if the engine is operated as part of a peak shaving (load management program) with the local distribution system operator and the power is provided only to the facility itself or to support the local distribution system.
- 59.d.iii.B. The 50 hours per year for non-emergency situations can be used to supply power as part of a financial arrangement with another entity if all of the following conditions are met: the engine is dispatched by the local balancing authority or local transmission and distribution system operator; the dispatch is intended to mitigate local transmission and/or

distribution limitations so as to avert potential voltage collapse or line overloads that could lead to the interruption of power supply in a local area or region; the dispatch follows reliability, emergency operation or similar protocols that follow specific NERC, regional, state, public utility commission or local standards or guidelines; the power is provided only to the facility itself or to support the local transmission and distribution system; the permittee identifies and records the entity that dispatches the engine and the specific NERC, regional, state, public utility commission or local standards or guidelines that are being followed for dispatching the engine. The local balancing authority or local transmission and distribution system operator may keep these records on behalf of the engine owner or operator.

- 59.e. The permittee must keep records of the hours of operation of the 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 the purposes in Conditions 59.d.ii.A or 59.d.ii.B or 59.d.ii.C, the permittee must keep records of the notification of the emergency situation, and the date, start time, and end time of engine operation for these purposes. [40 CFR 63.6655(f)]

#### PLANT SITE EMISSION LIMITS

60. Applicable Requirement: The plant site emissions must not exceed the following limits for any 12 consecutive calendar month period: [OAR 340-222-0040 through OAR 340-222-0043]

Pollutant	Plant Site Emission Limit (tons/yr)	Emission Reduction Credits (tons/yr)	Unassigned Emissions (tons/yr)
PM	215	57	135
PM <sub>10</sub>	166	24	62
PM <sub>2.5</sub>	128	24	18
SO <sub>2</sub>	50	NA	40
NO <sub>x</sub>	39	NA	55
CO	99	NA	420
VOC	670	NA	747
GHG – CO <sub>2</sub> e	74,000	NA	21,800

- 60.a. The credits expire on the following dates:  
 60.a.i. 56 tons of the PM credits and all of the PM<sub>10</sub> and PM<sub>2.5</sub> credits expire on 10/20/18  
 60.a.ii. The remaining 1 ton of the PM credits expires on 6/28/21
- 60.b. If the emission reduction credits are not used by the expiration date, they will become unassigned emissions as of the expiration date and will be available for use at the facility for 5 years after the expiration date.
- 60.c. The permittee may only use unassigned emissions after any necessary construction (OAR 340-218-0190) and permit revision applications (OAR 340-218-0120 through 340-218-0180) have been approved by the Department.
- 60.d. If the unassigned emissions listed in the table above are not used within the permit term, the unassigned emissions will be reduced to the SER at the next permit renewal. [OAR 340-222-0045]
61. Monitoring Requirement: The permittee must determine compliance with the Plant Site Emission Limits established in Condition 60 of this permit by conducting monitoring in accordance with the following procedures, test methods and frequencies: [OAR 340-218-0050(3)(a) 340-222-0080]

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

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

Where:

E	=	Pollutant emissions in lbs/month and tons/yr.
$P_{eu}$	=	Process parameter identified in the table below;
$EF_{eu}$	=	Emission factor identified for each emissions unit and pollutant in the tables below;
K	=	Conversion constant: 1 lb/lb for daily and monthly emissions calculations; 1 ton/2,000 lbs for annual emissions calculations.

**Particulate Matter Emissions Factors:**

Emissions Unit	Device	Throughput/Production	Emission Factors (EF)			EF Units
			PM	PM <sub>10</sub>	PM <sub>2.5</sub>	
HB01 – HB04	Defibrators and press	Hardboard production (MSF-1/8" basis)	0.165	0.165	0.165	lb/MSF
HB08	Bake oven	Hardboard production (MSF-1/8" basis)	0.009	0.009	0.009	lb/MSF
HB09	Bake oven roof vents	Hardboard production (MSF-1/8" basis)	0.04	0.04	0.04	lb/MSF
HB10	Cyclone HB7	Hardboard production (MSF-1/8" basis)	0.08	0.032	0.032	lb/MSF
HB11	Cyclones 19, 20, 21 (HB41 and HB42)	Hours of operation	0.05	0.03	0.03	lb/hr
HB12	Cyclone HB8	Hours of operation	0.1	0.04	0.008	lb/hr
	Cyclone HB9	Hours of operation	0.1	0.04	0.008	lb/hr
	Cyclone HB10	Hours of operation	0.2	0.08	0.016	lb/hr
	Cyclone HB11	Hours of operation	0.05	0.02	0.004	lb/hr
	Cyclone HB12	Hours of operation	0.02	0.008	0.0016	lb/hr
	Cyclone HB16	Hours of operation	0.0018	0.00072	0.00014	lb/hr
	Cyclone HB18	Hours of operation	0.0042	0.00168	0.00034	lb/hr
HB13	Cyclones 15, 25, 26, 30	BDT/yr	0.001	0.001	0.001	lb/BDT
HB14	Cyclone HB23	Hardboard production (MSF-1/8" basis)	0.0536	0.0322	0.0064	lb/MSF
	Cyclone HB31	Hours of operation	0.01	0.0085	0.0051	lb/hr
	Cyclone HB32	Hours of operation	0.01	0.0085	0.0051	lb/hr
	Cyclone HB44	Hours of operation	0.2	0.1	0.02	lb/hr
HB15	Cyclone HB27	Hardboard production (MSF-1/8" basis)	0.0416	0.0167	0.0033	lb/MSF
HB17	HB coating ovens	Natural gas burned (million cubic feet)	7.5	7.5	7.5	lb/mmcf
PB01	Press and unloader area	Particleboard production (MSF-3/4" basis)	0.22	0.21	0.18	lb/MSF
PB03	Trim saw vent	Particleboard production (MSF-3/4" basis)	0.25	0.155	0.031	lb/MSF
PB05	Core dryers	Tons furnish	0.467	0.467	0.465	lb/BDT
	Core dryers burning oil	Oil burned (gallons)	3.3	2.3	2.3	lb/hr
PB06	Surface dryers	Tons furnish	0.058	0.058	0.058	lb/BDT
PB07	Cyclone PB22	Hours of operation	0.9	0.54	0.11	lb/hr
PB08	Cyclone PM24	Hours of operation	4.5	2.7	0.54	lb/hr

Emissions Unit	Device	Throughput/Production	Emission Factors (EF)			EF Units
			PM	PM <sub>10</sub>	PM <sub>2.5</sub>	
PB09	Cyclone w/primary filters	BDT	0.001	0.001	0.001	lb/BDT
PB10	Cyclones w/secondary filters	Hours of operation	0.7	0.7	0.7	lb/hr
		BDT	0.004	0.004	0.004	lb/BDT
PB11	Storage piles	Constant (tons)	3.4	1.7	0.34	tons
PB12	Secondary screens	BDT	0.001	0.001	0.001	lb/BDT
Unpaved roads		Constant (tons)	3.6	1.3	0.13	tons
Aggregate insignificant		Constant (tons)	1	1	1	tons

**VOC Emissions Factors:**

Emissions Unit	Device	Throughput/Production	Emission Factor	EF Units
HB01 – HB04	Defibrators and press	Hardboard production (MSF-1/8" basis)	1.44	lb/MSF
HB08	Bake oven	Hardboard production (MSF-1/8" basis)	0.003	lb/MSF
HB09	Bake oven roof vents	Hardboard production (MSF-1/8" basis)	0.162	lb/MSF
HB17	HB coating ovens	Natural gas burned (million cubic feet)	5.8	lb/mmcf
HB18	Coating operations	Coating used (gallons or pounds)	Material balance	See Condition 61.b
PB01	Press and unloader	Particleboard production (MSF-3/4" basis)	1.14	lb/MSF
PB03	Trim saw vent	Particleboard production (MSF-3/4" basis)	0.072	lb/MSF
PB04	Board cooler vents	Particleboard production (MSF-3/4" basis)	0.084	lb/MSF
PB05	Core dryers	Natural gas burned (million cubic feet)	5.8	lb/mmcf
		Oil burned (gallons)	0.2	lb/1000 gallons
PB06	Surface dryers	Tons furnish	0.18	lb/BDT
PB12	Secondary vents	Tons furnish	0.426	lb/BDT

**Combustion Gas Emission Factors:**

Emissions Unit	Device	Fuel Usage	Emission Factor			EF Units
			SO <sub>2</sub>	NO <sub>x</sub>	CO	
HB08	Bake oven	Hardboard production (MSF-1/8" basis)	0.6	0.013	0.005	lb/MSF
HB17	HB coating ovens	Natural gas burned (million cubic feet)	0.6	100	21	lb/mmcf
PB05	Core dryers	Natural gas burned (million cubic feet)	0.6	100	21	lb/mmcf
		Oil burned (gallons)	71	20	5	lb/1000 gallons

**Greenhouse Gas Emission Factors:**

Fuel	Emission Factor	Units
Natural gas burned	0.12	lb CO <sub>2</sub> e/cubic foot
Oil burned	22.6	lb CO <sub>2</sub> e/gallon

- 61.b. The permittee shall maintain usage records of all materials that contain VOCs and calculate the daily and annual emissions for emission unit HB18 using the following equation:

$$E_2 = \sum[(RM_i \times D_i \times VOC_i) - (RM_d \times D_d \times VOC_d) \times K]$$

Where:

$E_2$	=	VOC emissions in lbs/day and tons/yr;
$RM_i$	=	Amount of each type of VOC containing raw material used in gal/month and gal/yr;
$RM_d$	=	Amount of each type of VOC containing raw material disposed in gal/month and gal/yr;
$D_i$	=	Density of each type of VOC containing raw material used in lbs/gal from manufacturer;
$D_d$	=	Density of each type of VOC containing raw material disposed in lbs/gal;
$VOC_i$	=	VOC content of raw material (weight fraction from manufacturer);
$VOC_d$	=	VOC content of disposed material (weight fraction);
$K$	=	Conversion constant = 1 lb/lb for daily emission calculations; 1 ton/2,000 lbs for annual emission calculations.

- 61.c. For PM, PM<sub>10</sub>, PM<sub>2.5</sub>, SO<sub>2</sub>, NO<sub>x</sub>, CO and GHG, the total annual emissions are the sum of the emissions calculated in accordance with Condition 61.a, for each pollutant.
- 61.d. For VOC, the permittee shall calculate the total annual VOC emissions as the sum of the VOC emissions calculated in Conditions 61.a and 61.b.

#### EMISSION FEES

62. Emission fees will be based on the Plant Site Emissions Limits, unless permittee elects to report actual emissions for one or more permitted processes/pollutants. If the permittee reports actual emissions for one or more permitted processes/pollutants, the permitted emissions for the remaining permitted processes/pollutants will be based on the emission detail sheet provided with the review report. [OAR 340-220-0090]

#### GENERAL TESTING REQUIREMENTS

63. Unless otherwise specified in this permit, the permittee must conduct all testing in accordance with the Department's Source Sampling Manual. [OAR 340-212-0120]
- 63.a. Unless otherwise specified by a state or federal regulation, the permittee must submit a source test plan to the Department at least 30 days prior to the date of the test. The test plan must be prepared in accordance with the Source Sampling Manual and address any planned variations or alternatives to prescribed test methods. The permittee should be aware that if significant variations are requested, it may require more than 30 days for the Department to grant approval and may require EPA approval in addition to approval by the Department.
- 63.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.
- 63.c. Unless otherwise specified by permit condition or Department approved source test plan, all compliance source tests must be performed as follows:
- 63.c.i. At least 90% of the design capacity for new or modified equipment;
  - 63.c.ii. At least 90% of the maximum operating rate for existing equipment; or
  - 63.c.iii. At 90 to 110% of the normal maximum operating rate for existing equipment. For purposes of this permit, the normal maximum operating rate is defined as the 90th percentile of the average hourly operating rates during a 12 month period immediately preceding the source test. Data supporting the normal maximum operating rate must be included with the source test report.

- 63.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, the Department may accept two (2) test runs for demonstrating compliance with the emission limit or standard.
- 63.e. Source test reports prepared in accordance with the Department's Source Sampling Manual must be submitted to the Department within 45 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:

64. The permittee must not knowingly render inaccurate any required monitoring device or method. [OAR 340-218-0050(3)(a)(E)]
65. Methods used to determine actual emissions for fee purposes must also be used for compliance determination and can be no less rigorous than the requirements of OAR 340-218-0080. [OAR 340-218-0050(3)(a)(F)]
66. Monitoring requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(a)(G)]

### General Recordkeeping Requirements

67. The permittee must maintain the following general records of testing and monitoring required by this permit: [OAR 340-218-0050(3)(b)(A)]
  - 67.a. The date, place as defined in the permit, and time of sampling or measurements;
  - 67.b. The date(s) analyses were performed;
  - 67.c. The company or entity that performed the analyses;
  - 67.d. The analytical techniques or methods used;
  - 67.e. The results of such analyses;
  - 67.f. The operating conditions as existing at the time of sampling or measurement; and
  - 67.g. The records of quality assurance for continuous monitoring systems (including but not limited to quality control activities, audits, calibration drift checks).
68. Unless otherwise specified by permit condition, the permittee must make every effort to maintain 100 percent of the records required by the permit. If information is not obtained or recorded for legitimate reasons (e.g., the monitor or data acquisition system malfunctions due to a power outage), the missing record(s) will not be considered a permit deviation provided the amount of data lost does not exceed 10% of the averaging periods in a reporting period or 10% of the total operating hours in a reporting period, if no averaging time is specified. Upon discovering that a required record is missing, the permittee must document the reason for the missing record. In addition, any missing record that can be recovered from other available information will not be considered a missing record. [OAR 340-214-0110, 340-212-0160, and 340-218-0050(3)(b)]
69. Recordkeeping requirements must commence on the date of permit issuance unless otherwise specified in the permit or an applicable requirement. [OAR 340-218-0050(3)(b)(C)]
70. Unless otherwise specified, the permittee must retain records of all required monitoring data and support information for a period of at least five (5) years from the date of the monitoring sample, measurement, report or application. Support information includes all calibration and maintenance records and all original strip-chart recordings (or other original data) for continuous monitoring instrumentation, and copies of all reports required by the permit. All existing records required by the previous Air Contaminant Discharge Permit or Oregon Title V Operating Permit must also be retained for five (5) years from the date of the monitoring sample, measurement, report or application. [OAR 340-218-0050(b)(B)]

## REPORTING REQUIREMENTS

### General Reporting Requirements

71. Excess Emissions Reporting: The permittee must report all excess emissions as follows: [OAR 340-214-0300 through 340-214-0360]
- 71.a. Immediately (within 1 hour of the event) notify the Department of an excess emission event by phone, e-mail or facsimile; and
  - 71.b. Within 15 days of the excess emissions event, submit a written report that contains the following information: [OAR 340-214-0340(1)]
    - 71.b.i. The date and time of the beginning of the excess emissions event and the duration or best estimate of the time until return to normal operation;
    - 71.b.ii. The date and time the owner or operator notified the Department of the event;
    - 71.b.iii. The equipment involved;
    - 71.b.iv. Whether the event occurred during planned startup, planned shutdown, scheduled maintenance, or as a result of a breakdown, malfunction or emergency;
    - 71.b.v. Steps taken to mitigate emissions and corrective action taken, including whether the approved procedures for a planned startup, shutdown or maintenance activity were followed;
    - 71.b.vi. The magnitude and duration of each occurrence of excess emissions during the course of an event and the increase over normal rates or concentrations as determined by continuous monitoring or best estimate (supported by operating data and calculations);
    - 71.b.vii. The final resolution of the cause of the excess emissions; and
    - 71.b.viii. Where applicable, evidence supporting any claim that emissions in excess of technology-based limits were due to any emergency pursuant to OAR 340-214-0360.
  - 71.c. In the event of any excess emissions which are of a nature that could endanger public health and occur during non-business hours, weekends or holidays, the permittee must immediately notify the Department by calling the Oregon Emergency Response System (OERS). The current number is 1-800-452-0311.
  - 71.d. If startups, shutdowns or scheduled maintenance may result in excess emissions, the permittee must submit startup, shutdown or scheduled maintenance procedures used to minimize excess emissions to the Department for prior authorization, as required in OAR 340-214-0310 and 340-214-0320. New or modified procedures must be received by the Department 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.
  - 71.e. The permittee must notify the Department of planned startup/shutdown or scheduled maintenance events.
  - 71.f. 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)]
72. 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 71. [OAR 340-218-0050(3)(c)(B)]
73. All required reports must be certified by a responsible official consistent with OAR 340-218-0040(5); [OAR 340-218-0050(3)(c)(D)]

74. 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:

DEQ – Eastern Region	Air Operating Permits
475 NE Bellevue Dr., Suite 110	US Environmental Protection Agency
Bend, OR 97701	1200 Sixth Avenue, Suite 900
(541) 388-6146	Seattle, WA 98101

### Semi-Annual and Annual Reports

75. The permittee must submit three (3) copies of reports of any required monitoring at least every 6 months, completed on forms approved by the Department. Six month periods are January 1 to June 30, and July 1 to December 31. One copy of the report must be submitted to the Air Operating Permits, US Environmental Protection Agency and two copies 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)]
- 75.a. The first semi-annual report is due on July 30 and must include the semi-annual compliance certification, OAR 340-218-0080.
- 75.b. The annual report is due on March 15 and must consist of the following:
- 75.b.i. The emission fee report; [OAR 340-220-0100]
  - 75.b.ii. A summary of the excess emissions upset log; [OAR 340-214-0340]
  - 75.b.iii. The second semi-annual compliance certification; [OAR 340-218-0080]
  - 75.b.iv. The GHG report, if required by Condition 76;
  - 75.b.v. Revisions to the fugitive control plan, if any; and
  - 75.b.vi. Annual criteria pollutant emissions for each 12-calendar month period.
- 75.c. The first annual report due after the permit is issued must also include a current inventory of the potential hazardous air pollutant emissions.
76. **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) and included in the annual report required by Condition 75.b.
77. 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)]
- 77.a. The identification of each term or condition of the permit that is the basis of the certification;
  - 77.b. The identification of the method(s) or other means used by the owner or operator for determining the compliance status with each term and condition during the certification period, and whether such methods or other means provide continuous or intermittent data. Such methods and other means must include, at a minimum, the methods and means required under OAR 340-218-0050(3). *Note: Certification of compliance with the monitoring conditions in the permit is sufficient to meet this requirement, except when the permittee must certify compliance with new applicable requirements that are incorporated by reference into the permit. When certifying compliance with new applicable requirements incorporated by reference, the permittee must provide the information required by this condition.* If necessary, the owner or operator 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;

- 77.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 77.b of this rule. The certification must identify each deviation and take it into account in the compliance certification. The certification must also identify as possible exceptions to compliance any periods during which compliance is required and in which an excursion or exceedance, as defined under OAR 340-200-0020, occurred; and
- 77.d. Such other facts as the Department may require to determine the compliance status of the source.
- 77.e. Notwithstanding any other provision contained in any applicable requirement, the owner or operator 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)]

#### **Subpart DDDD Reporting Requirements:**

- 78. The permittee must report each instance in which the permittee did not meet each compliance option, operating requirement, and work practice requirement in Conditions 25, 27, 29, 30, 31, 46, 47 and 48. This includes periods of startup, shutdown and malfunction, and periods of control device maintenance specified in paragraphs (b)(1) through (3) of this section. These instances are deviations from the compliance options, operating requirements and work practice requirements in this subpart. These deviations must be reported according to the requirements in Condition 79. [40 CFR 63.6271(b)]
  - 78.a. Consistent with 40 CFR 63.6(e) and 63.7(e)(1), deviations that occur during a period of startup, shutdown or malfunction are not violations if you demonstrate to the DEQ's satisfaction that you were operating in accordance with 40 CFR 63.6(e)(1). DEQ will determine whether deviations that occur during a period of startup, shutdown or malfunction are violations, according to the provisions in 40 CFR 63.6(e).
  - 78.b. Deviations that occur during periods of control device maintenance covered by any approved routine control device maintenance exemption are not violations if you demonstrate to DEQ's satisfaction that you were operating in accordance with the approved routine control device maintenance exemption.
- 79. The permittee must submit a compliance report semi-annually along with the semi-annual compliance certification report required by Condition 75. The compliance report must include the following information: [40 CFR 63.2281(a), (b)(5), and (c)]
  - 79.a. Company name and address.
  - 79.b. 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.
  - 79.c. Date of report and beginning and ending dates of the reporting period.
  - 79.d. If there were startups, shutdowns or malfunctions during the reporting period and the operator took actions consistent with the SSMP, the compliance report must include the information specified in 40 CFR 63.10(d)(5)(i).
  - 79.e. A description of control device maintenance performed while the control device was offline and one or more of the process units controlled by the control device was operating, including the following information:
    - 79.e.i. The date and time when the control device was shut down and restarted.
    - 79.e.ii. Identification of the process units that were operating and the number of hours that each process unit operated while the control device was offline.
    - 79.e.iii. A statement of whether or not the control device maintenance was included in your approved routine control device maintenance exemption developed pursuant to 40 CFR 63.2251. If the control device maintenance was included in your approved routine control device maintenance exemption, then you must report the following information:

- 79.e.iii.A. The total amount of time that each process unit controlled by the control device operated during the semiannual compliance period and during the previous semiannual compliance period.
- 79.e.iii.B. The amount of time that each process unit controlled by the control device operated while the control device was down for maintenance covered under the routine control device maintenance exemption during the semiannual compliance period and during the previous semiannual compliance period.
- 79.e.iii.C. Based on the information recorded under (A) and (B) for each process unit, compute the annual percent of process unit operating uptime during which the control device was offline for routine maintenance using the following equation:

$$RM = (DT_p + DT_c)/(PU_p \text{ } PU_c)$$

Where:

- RM = Annual percentage of process unit uptime during which control device is down for routine control device maintenance;
- DT<sub>p</sub> = Control device downtime claimed under the routine control device maintenance exemption for the previous semiannual compliance period;
- DT<sub>c</sub> = Control device downtime claimed under the routine control device maintenance exemption for the current semiannual compliance period.
- PU<sub>p</sub> = Process unit uptime for the previous semiannual compliance period;
- PU<sub>c</sub> = Process unit uptime for the current semiannual compliance period;

- 79.f. The results of any performance tests conducted during the semiannual reporting period.
  - 79.g. If there are no deviations from any applicable compliance option or operating requirement, a statement that there were no deviations from the compliance options or operating requirements during the reporting period.
  - 79.h. If there were no periods during which the continuous monitoring system (CMS) was out-of-control as specified in 40 CFR 63.8(c)(7), a statement that there were no periods during which the CMS was out-of-control during the reporting period.
  - 79.i. The permittee must report all deviations as defined in this subpart in the semiannual monitoring report required by Condition 75. If the permittee submits a compliance report pursuant to this condition along with, or as part of, the semiannual monitoring report required by Condition 75, and the compliance report includes all required information concerning deviations from any compliance option, operating requirement, or work practice requirement in this condition, submission of the compliance report shall be deemed to satisfy any obligation to report the same deviations in the semiannual monitoring report. However, submission of a compliance report shall not otherwise affect any obligation the affected source may have to report deviations from permit requirements to the permitting authority.
80. For each deviation from a compliance option or operating requirement and work practice requirements occurring at an affected source where the permittee is using a CMS to comply with the compliance options and operating requirements, the permittee must include the following information in the semi-annual compliance report. This includes periods of startup, shutdown and malfunction and routine control device maintenance. [40 CFR 63.62(e)]
- 80.a. The date and time that each malfunction started and stopped.
  - 80.b. The date and time that each CMS was inoperative, except for zero (low-level) and high-level checks.

- 80.c. The date, time and duration that each CMS was out-of-control, including the information in 40 CFR 63.8(c)(8).
  - 80.d. The date and time that each deviation started and stopped, and whether each deviation occurred during a period of startup, shutdown or malfunction; during a period of control device maintenance covered in your approved routine control device maintenance exemption; or during another period.
  - 80.e. A summary of the total duration of the deviation during the reporting period and the total duration as a percent of the total source operating time during that reporting period.
  - 80.f. A breakdown of the total duration of the deviations during the reporting period into those that are due to startup, shutdown, control system problems, control device maintenance, process problems, other known causes, and other unknown causes.
  - 80.g. A summary of the total duration of CMS downtime during the reporting period and the total duration of CMS downtime as a percent of the total source operating time during that reporting period.
  - 80.h. A brief description of the process units.
  - 80.i. A brief description of the CMS.
  - 80.j. The date of the latest CMS certification or audit.
  - 80.k. A description of any changes in CMS, processes, or controls since the last reporting period.
81. The permittee must notify DEQ within 30 days before taking either of the following actions: [40 CFR 63.6280(g)]
- 81.a. Modifying or replacing the control system for any process unit subject to the compliance options and operating requirements in Conditions 25, 29, 43 and 46; or
  - 81.b. Changing a continuous monitoring parameter or the value or range of values of a continuous monitoring parameter for any process unit or control device.

**Subpart QQQQ Reporting Requirements:**

82. The permittee must submit semi-annual compliance certification reports required by 40 CFR 63.3920(a) and 63.4720(a). The permittee may submit the reports along with, or as part of, the semiannual compliance certification reports required by Condition 75. The following information must be included with the semiannual report if the permittee submits it as part of the semiannual compliance certification required by Condition 75: [40 CFR 63.4620(a)]
- 82.a. If there are no deviations from the emission limitations in Condition 52, the semiannual compliance report must include a statement that there were no deviations from the emission limitations during the reporting period. [40 CFR 63.3920(a)(4) and 63.4620(a)(4)]
  - 82.b. If there was a deviation from the applicable organic HAP content requirements in Condition 52, the semiannual compliance report must contain the following information: [40 CFR 63.4620(a)(5)]
    - 82.b.i. Identification of each coating used that deviated from the applicable emission limit, and each thinner and/or other additive, and cleaning material used that contained organic HAP, and the dates and time periods each was used;
    - 82.b.ii. The calculation of the organic HAP content (using the equation in Condition 55.d) for each coating identified in Condition 82.b.i. The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports);
    - 82.b.iii. The determination of mass fraction of organic HAP for each thinner and/or other additive, and cleaning material identified in Condition 82.b.i. The permittee does not need to submit background data supporting this calculation (e.g., information provided by coating suppliers or manufacturers, or test reports); and
    - 82.b.iv. A statement of the cause of each deviation.

## GENERAL CONDITIONS

### G1. General Provision

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

### G2. Reference materials

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

- a. Source Sampling Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A4;
- b. Continuous Monitoring Manual; January 23, 1992 - State Implementation Plan Volume 3, Appendix A6; and
- c. All state and federal regulations as in effect on the date of issuance of this permit.

### G3. Applicable Requirements [OAR 340-218-0010(3)(b)]

Oregon Title V Operating Permits do not replace requirements in Air Contaminant Discharge Permits (ACDP) issued to the source even if the ACDP(s) have expired. For a source operating under a Title V permit, requirements established in an earlier ACDP remain in effect notwithstanding expiration of the ACDP or Title V permit, unless a provision expires by its terms or unless a provision is modified or terminated following the procedures used to establish the requirement initially. Source specific requirements, including, but not limited to TACT, RACT, BACT, and LAER requirements, established in an ACDP must be incorporated into the Oregon Title V Operating Permit and any revisions to those requirements must follow the procedures used to establish the requirement initially.

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

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

### G5. Masking Emissions

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

G6. Credible Evidence

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

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

Any document submitted to the Department 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 the Department 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. the Department, 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 the Department 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 the Department.

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 the Department of Environmental Quality, 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, 811 SW 6th Ave., Portland, OR 97204, within 30 days of date the Department 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 the Department of Environmental Quality. 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 the Department 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 the Department 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 the Department prior to construction or modification of any stationary source or air pollution control equipment in accordance with OAR 340-210-0200 through OAR 340-210-0250.

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

The permittee may not begin construction of a major source or a major modification of any stationary source without having received an air contaminant discharge permit (ACDP) from the Department 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 the Department, within a reasonable time, any information that the Department 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 the Department copies of records required to be retained by the permit or, for information claimed to be confidential, the permittee may furnish such records to the Department 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 the Department.
- 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 the Department requests an earlier submittal. If more than 12 months is required to process a permit renewal application, the Department 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 the Department or an authorized representative upon request.

ALL INQUIRIES SHOULD BE DIRECTED TO:

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

**ATTACHMENT 1**  
**CROSS-REFERENCE FROM NEW RULE NUMBERS TO OLD RULE NUMBERS**  
(EFFECTIVE MARCH 24, 2003)

<b>New Rule Number</b>	<b>Old Rule Number</b>	<b>New Rule Number</b>	<b>Old Rule Number</b>	<b>New Rule Number</b>	<b>Old Rule Number</b>	<b>New Rule Number</b>	<b>Old Rule Number</b>
208-0110	021-0015	218-0100	028-2180	220-0040	028-2590	264-0030	023-0030
208-0200	021-0055	218-0110	028-2190	220-0050	028-2600	264-0040	023-0035
208-0210	021-0060	218-0120	028-2200	220-0060	028-2610	264-0050	023-0040
214-0300	028-1400	218-0130	028-2210	220-0070	028-2620	264-0060	023-0042
214-0310	028-1410	218-0140	028-2220	220-0080	028-2630	264-0070	023-0043
214-0320	028-1420	218-0150	028-2230	220-0090	028-2640	264-0080	023-0045
214-0330	028-1430	218-0160	028-2240	220-0100	028-2650	264-0100	023-0055
214-0340	028-1440	218-0170	028-2250	220-0110	028-2660	264-0110	023-0060
214-0350	028-1450	218-0180	028-2260	220-0120	028-2670	264-0120	023-0065
214-0360	028-1460	218-0190	028-2270	220-0130	028-2680	264-0130	023-0070
218-0010	028-2100	218-0200	028-2280	220-0140	028-2690	264-0140	023-0075
218-0020	028-2110	218-0210	028-2290	220-0150	028-2700	264-0150	023-0080
218-0040	028-2120	218-0220	028-2300	220-0160	028-2710	264-0160	023-0085
218-0050	028-2130	218-0230	028-2310	220-0170	028-2720	264-0170	023-0090
218-0060	028-2140	218-0240	028-2320	220-0180	028-2730	264-0180	023-0100
218-0070	028-2150	218-0250	028-1790	220-0190	028-2740	264-0190	023-0105
218-0080	028-2160	220-0010	028-2560	264-0010	023-0022	264-0200	023-0115
218-0090	028-2170	220-0030	028-2580	264-0020	023-0025		